

## **Warner Matthews Ltd Privacy Policy – May 2018**

**The EU General Data Protection Regulation (GDPR), which applies from 25th May 2018, gives people more control over how their personal data is used. The Regulation sets out your rights as an individual regarding how your personal data is collected, used and stored, including your rights to have data corrected or removed.**

We take the privacy and security of your personal information very seriously and are committed to protecting and respecting your privacy.

This Policy sets out the purpose for which personal data that Warner Matthews Ltd collects from you, or that you provide to us, will be processed by us. This applies whether your personal data was obtained directly by us or provided to us from other sources. Please read it carefully to understand our views and practices regarding your personal data and how we will treat it.

For the purposes of this Policy, "European Data Protection Legislation" is defined as, for the periods in which they are in force, the European Data Protection Directive 95/46/EC, all laws giving effect or purporting to give effect to the European Data Protection Directive 95/46/EC (such as the Data Protection Act 1998) or otherwise relating to data protection (to the extent the same apply) and, from 25 May 2018, the General Data Protection Regulation (Regulation (EU) 2016/679) ("GDPR") or any equivalent legislation amending, supplementing or replacing the GDPR.

**Who we are:** Warner Matthews Ltd is a Limited Company registered in England & Wales (registration number 02343046) whose registered address is at 121 Promenade, Cheltenham, GL54 1NW.

References to "we" or "us" are to Warner Matthews Ltd as appropriate.

### **Why we need your details**

Warner Matthews Ltd collects and uses your personal details so that we can process one or more of the following:

- Provide you with financial advice
- Reply to any requests for information that you ask us for
- Clarify any particular query
- Supply details of any product or service that we believe may meet your needs
- Cross check any information that we receive with that held on our database.

### **Information we may collect about you**

We may collect and process information about you through various means including:

- in the course of carrying out work for you (or your business)
- by email or other electronic correspondence
- by telephone
- in writing

### **The personal data you give to us may include:**

- your name, title and date of birth
- contact information, including telephone number, postal address and email address
- information relating to your location, preferences and/or interests
- employment and job application details, e.g. employment history, qualifications
- photographic identification
- your and others' signature(s), National Insurance number(s), financial details such as bank account details and details of any relevant sanctions or similar restrictions
- In certain circumstances data relating to health (including disabilities), ethnicity, race, religious beliefs and other 'special category personal data'
- any other personal data we collect (such as the client reference number which may be assigned to you) in the context of our work for our clients or in the course of operating our business.

### **How we will use your information**

We may use your information for the following purposes:

- to respond to any query that you may submit to us
- to manage our relationship with you (and/or your business), including by maintaining our database of clients and other third parties for administration, and accounting and relationship management purposes
- to complete our contractual obligations to you or otherwise taking steps as described in our engagement terms and/or our Retail Client Agreement (including any associated administration)
- to carry out any relevant conflict checks, anti-money laundering and sanctions checks and fulfilling our obligations under any relevant anti-money laundering law or regulation (including under The Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017)
- to send you any relevant information on our services that may be of interest to you using the email and/or postal address which you have provided but only if you have given us your consent to do so or we are otherwise able to do so in accordance with applicable European Data Protection Legislation
- to comply with any other professional and regulatory obligations which apply to us or policies that we have in place
- as we feel is necessary to prevent illegal activity or to protect our interests.

### **Sharing your information**

We will never sell, trade, or rent your personal information to third parties.

We may share your details with carefully selected third parties. These may include service providers, support services and organisations that help us to market our services and third parties instructed to enable us to fulfil our contractual obligations to you and/or our clients in the course of business.

We will only share your personal data in compliance with the European Data Protection Legislation.

We may share your data with a third party in the following circumstances:

- To entities that we are required to disclose the data to in connection with the performance of our contract with you.
- To providers of outsourced services to the extent necessary for the provider to provide those outsourced services to us.
- To a prospective seller or buyer of our business or assets if we sell or buy any business or assets.

We may also share your data with third parties if we are under a duty to comply with any legal or regulatory obligation, in order to enforce or apply such other terms as apply to our relationship, or to protect the rights, property or safety of our customers, ourselves or others.

This includes exchanging information with other companies and organisations for the purpose of fraud prevention and the detection of financial and other crime.

Third parties include:

- our preferred Product Providers & Investment Houses including as permitted by The Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017 which, for the purposes of preventing money laundering or terrorist financing, may require us to disclose your personal data
- our insurers
- our auditors, including external accreditation bodies
- other professional advisors or third parties (including accountants & technical experts) with whom we engage as part of our work for our clients or who our clients separately engage in the same context
- our regulator, the Financial Conduct Authority (FCA)
- our data processors providing security, email security, data governance, archiving and other IT and business support services
- any third party you ask us to share your data with.

### **Storage and retention of your personal data**

We follow strict security procedures as to how your personal information is stored and used, and who sees it, to help stop any unauthorised person getting hold of it. All personal information you register on our website will be located behind a firewall.

Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access. Unfortunately, the transmission of information via the internet is not completely secure and although we do our best to protect your personal data, we cannot absolutely guarantee the security of your data.

We will keep your information stored on our systems for as long as it takes to provide the services to you and in accordance with our Client Agreement. We may keep your data for longer than our stated retention period if we cannot delete it for legal, regulatory or technical reasons. We may also keep it for research, preventing conflicts of interests or statistical purposes. If we do, we will ensure that appropriate safeguards are in place to protect your privacy and only used for those purposes.

The third parties we engage to provide services on our behalf will keep your data stored on their systems for as long as is necessary to provide the services to you.

We will not store your information for longer than is reasonably necessary or required by law.

### **Sending your information outside of the EEA**

If we need to share your personal data with a recipient outside the European Economic Area ("EEA") (e.g. a professional advisor or third party engaged by us or you as part of our work under an engagement letter) we will ensure we do so in compliance with European Data Protection Legislation, including where applicable by ensuring that the transfer is necessary to perform a contract in place with you or a contract entered into in your interests. If these transfers affect you, you may contact us to obtain more precise information and a copy of relevant documentation.

### **Withdrawal of consent**

Where we process your personal data we do so on the basis that you have provided your consent for us to do so for the purposes set out in this Policy when you submitted your personal data to us. You may withdraw your consent to this processing at any time by contacting the Data Protection Officer.

If you do withdraw your consent we may still be able to process some of the data that you have provided to us on other grounds and will notify you of these at such time.

### **Your information rights**

European Data Protection Legislation gives you the right to access information held about you. You are entitled to be told by us whether we or someone else on our behalf is processing your personal information; what personal information we hold; details of the purposes for the processing of your personal information; and details of any third party with whom your personal information has been shared.

You can access the personal information we hold on you by writing to the Data Protection Officer.

We will ask you to provide proof of identity before we show you your personal information – this is so we can prevent unauthorised access.

Please note: For any access request made after 25 May 2018 that is deemed excessive or especially repetitive, we may charge a 'reasonable fee' for meeting that request. Similarly, we may charge a reasonable fee to comply with requests for further copies of the same information. (That fee will be based upon the administrative costs of providing the information).

### **Removing or changing your information**

If you wish to change the information that we hold for you please contact the Data Protection Officer.

If you wish to have your information removed from our database either permanently or temporarily, please contact us. Due to our regulatory obligations and legal responsibilities there may be occasions where we are unable to delete records. We will discuss this with all clients who request any data to be deleted.

**Making a complaint about the way in which your data is stored or used**

In the unlikely event that you have a complaint about the way in which your details are used or stored by this company please contact the Data Protection Officer.

You also have the right to make a complaint to the Information Commissioner's Office. For more details please visit the ICO website ([www.ico.org.uk](http://www.ico.org.uk)) or by telephoning 0303 123 1113.

**Contact**

Questions, comments and requests regarding this Policy should be addressed to our Data Protection Officer:

Name: Jonathan Matthews

Address: Warner Matthews Ltd, 121 Promenade, Cheltenham, GL50 1NW.

Telephone: 01242 524 386

Email address: [jonathan@warnermatthews.co.uk](mailto:jonathan@warnermatthews.co.uk)