

privacy notice.

use of your personal information.

Wealth at Work Limited is committed to protecting and respecting your privacy. Any reference to “we”, “our” or “us” means Wealth at Work Limited trading as my wealth, which is a private limited company with registered company number 05225819. Our registered office address is Third Floor, 5 St Paul’s Square, Liverpool, L3 9SJ

This notice applies to personal data we process in connection with the provision of services to you.

Please read it carefully as it contains important information as to how and why we collect, store, use and share your personal data. It also explains your rights in relation to your personal data and what to do in the event you have a complaint.

We are a data controller and data processor in respect of your personal data and we are responsible for ensuring that we use your personal data in compliance with data protection law.

Under data protection law, we can only use your personal data if we have a proper reason for doing so. The following are the most likely reasons we will use your personal data:

- in the performance of any contract we may have with you;
- where you have given consent for us to do so;
- to comply with legal obligations we may have;
- for legitimate interests which might include complying with requests from you or keeping you updated in relation to changes to our services.

Personal data we collect about you

Data received directly from you

When you contact us or we contact you in relation to the services we offer we will ask you to provide personal information which will be restricted to the information required to provide whichever service you require.

This information may include (but not be limited to) one or more of your name, title, address, e-mail address, phone number, date of birth, national insurance number, bank account details, nationality, income, financial commitments, investments, pensions and sensitive information (such as health details), or those details relating to your spouse/partner or other relatives, dependants, and any beneficiaries under a trust.

Data will also include any other information or updates to your information that you provide when corresponding with us.

Where you are providing information to us about another person(s), we expect you to ensure that you are doing so with the knowledge and consent of the person(s) in question. Please show them a copy of this notice, and if they have any concerns please contact us by using the details set out in the ‘Contact us’ section below.

Data received from third parties or publicly available sources

We may request or receive information from external sources for the purpose of complying with legal requirements or where you have authorised third parties such as product providers to provide personal information to us.

Cookies

Our website utilises cookies to automatically gather certain statistical information. The processing of this data is for aggregated statistical analysis only. We do not identify individual users from this type of data and it does not involve the processing of personal data about you. This

information helps us to measure how individuals use our website and our services, so that we can continually improve them. For more information on our use of cookies, please refer to our cookies policy on our website.

How we might collect your personal data

Data may be collected in various ways which include (but are not restricted to):

- written communications received from you which contain your personal data;
- calls to or from you which may elicit personal information;
- fact finding documents completed by us in the course of providing services to you;
- information provided in face to face conversations with you (including video calls);
- application forms submitted by you or on your behalf;
- documentation received from third parties;
- communications via email, website or other electronic means;
- recording of calls including the audio of video calls. (We do not record the visuals of any call or meeting);
- publicly available information.

How and why we use your personal data

The following are typical of the ways in which we use your data but are not exhaustive:

- to provide services which we have contractually committed to provide to you;
- for operational purposes and statistical analysis (including behaviour analysis);
- to provide you with up-to-date information concerning investment products and services (including those supplied by third parties) which we feel may be appropriate for you to consider in connection with the provision of the services;
- to identify you when you contact us;
- to provide you with other services reasonably ancillary to our obligations arising under or in connection with any contract with you;
- to administer and maintain user access to our services and/or website;
- to monitor and improve our services and website;
- for internal analysis and research;
- to provide information in relation to services offered by the Wealth at Work group of companies;
- to meet legal and regulatory requirements.

Special category data

We may on occasion collect sensitive personal information about you. By way of example, where data in relation to your health is required for a particular service, we will obtain your explicit consent to process this special category data for such purposes.

Sharing your personal data

We do not share your data with any third party for marketing purposes.

We may share your personal data within the Wealth at Work group. We may share your data with the following third parties:

- those providing services to us under a contractual arrangement for the purpose of enabling us to provide services to you, which will include software suppliers and third party administrators;
- professional advisers including lawyers, bankers, auditors and insurers in the normal course of business;

- agencies that we are obliged by law to provide data to such as HM Revenue & Customs;
- fraud prevention agencies.

Your personal data may be shared in the circumstances described below:

- to facilitate the provision of services to you and the running of our business;
- to facilitate the administration and maintenance of user access to our services and/or website;
- to ensure the safety and security of our data;
- to conduct and/or improve our business development activities.

Dealing, custody and settlement services

Where we arrange with a custodian to provide custody services to you, you can view a copy of their privacy notice. Please visit: www.winterfloodbusinessservices.com/userfiles/PrivacyNotice.pdf

Where your personal information is held

Your personal information will normally be held at our offices and the offices of any third parties with whom we share data and in electronic files which may be held in secure servers in the UK or placed in the Cloud.

International transfers

We will endeavour to ensure that your personal information will always be stored in the UK or a third country covered by UK ‘adequacy regulations’ such as the European Economic Area (“EEA”) countries. However, from time to time, it may be transferred to, stored in, or accessed from a destination outside the UK or third country not covered by adequacy regulations. It may also be processed by individuals operating outside of these countries who work for us or for one of our suppliers.

Any transfer outside the UK or third country without an adequacy finding is subject to special rules under European and UK data protection law. Where your personal data is transferred outside the EEA, we will ensure it has an appropriate level of protection and that the transfer complies with data protection law.

You can obtain more details of the protection given to your personal data when it is transferred by contacting us using the details set out in the “Contact us” section below.

Children’s data

We do not generally process personal data belonging to children and will only do so at your instruction.

Data retention

How long we hold your personal data for will vary. The retention period will be determined by various criteria including:

- the purpose for which we are using it – we will need to keep the data for as long as is necessary for that purpose (for example, to communicate with you in respect of our services for so long as you remain a recipient of such services, or to respond to any questions, complaints or claims made by you or on your behalf);
- legal and regulatory obligations – applicable laws, rules or regulations may set a minimum period for which we have to store your personal data.

Data security

We have appropriate security measures in place to prevent personal information from being accidentally lost, or used or accessed in an unauthorised way. We limit access to your personal information to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach when appropriate.

Your legal rights

You can: **Request access** to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. Please note that there may be circumstances where you ask us to erase your personal data but we are legally entitled to retain it.

Object to processing of your personal data where we are relying on a legitimate interest and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms.

Request restriction of processing of your personal data.

Request the transfer of your personal data to you or to a third party in certain situations. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

Lodge a complaint with the Information Commissioner if you think that any of your rights have been infringed by us.

How to complain

We hope that we can resolve any query or concern you may raise about our use of your information and you can make a complaint by writing to us at our registered office address, or contacting us by telephone on **0800 028 3200**, or by contacting your Adviser if you are an existing client.

You can also contact the Information Commissioner at www.ico.org.uk/concerns or telephone **0303 123 1113** for further information about your rights and how to make a formal complaint.

Contact us

Please contact us if you have any questions about this notice or personal data that we may hold about you. You can write to us at our registered office address for the attention of the Legal Department, Alternatively, you can email us at privacy@wealthatwork.co.uk.

This privacy notice may be updated from time to time and the most recent version can be found on our website, or we can provide you with a hard copy on request.

Useful hints and tips for security: Take care when discarding documents that contain your information (financial planning reports, bank statements, credit card slips) as this can be valuable information to a fraudster. Do not place in a dustbin but dispose of securely, for example by shredding.

Call us on 0800 028 3200.

Email us at mywealth@wealthatwork.co.uk or visit www.wealthatwork.co.uk/mywealth

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