WEALTH
MANAGEMENT
PARTNERS

Privacy Notice

Wealth Management Partners Group

March 2021

Wealth Management Partners Group (we, us or our) knows that you care how your information is used and shared, and we appreciate your trust in us to do that carefully and sensibly. Your privacy is important to us and we are committed to protecting and respecting your privacy.

This Privacy Notice explains how we use your personal data. It has been drafted to address the requirements of the General Data Protection Regulation (EU) 2016/679 ("GDPR") and the Data Protection Act 2018 (together "Data Protection Laws"). Personal data is information about you that we may collect directly from you, or it might be information that is provided to us about you by your investment, pension, insurance or other financial services providers, accountants, lawyers, the providers of any policies held by you or on your behalf, the trustees of any trust of which you are a beneficiary, or other sources (together referred to as "Providers") at your direction. Your personal data will be collected by us when you use our website, when you complete our opening paperwork to become a client using our services, and during the provision of our services to you.

Your responsibilities

This Privacy Notice also applies to the personal data of your family members and/or other dependants. Where you, or others on your behalf, provide us with their personal information, you are confirming to us that you are authorised to provide it. It is also your responsibility to draw this Privacy Notice to their attention.

It is also important that the personal data we hold about you and your family members is accurate and current. Please keep us informed if any of this personal data changes during your relationship with us.

This Privacy Notice explains:

- Who we are
- Personal Data we may collect
- Personal Data we obtain from third parties
- Why we collect and use your personal data
- Who we share your personal data with
- How long we will retain your personal data
- Cookies and similar technologies
- Marketing and research
- Applications for employment
- How to access and control your personal data - Your rights
- Your right to withdraw consent
- Your right to make a complaint
- Changes to our Privacy Policy

Who we are

We are Wealth Management Partners Group, and we are the Controller of the personal data we hold about you, your family members and/or other dependants. Our business contact details are:

Registered office: First Floor, Cockington House, Cockington Village, Torquay, United Kingdom, TQ2 6XA.
By phone: 01803 690 444
By email: Info@wealthmanagementpartners.co.uk
Website: www.wealthmanagementpartners.co.uk

The contact details of our Data Protection Officer are:

Name: Lisa Melville: First Floor, Cockington House, Cockington Village, Torquay, United Kingdom, TQ2 6XA.
By phone: 01803 690 444
By email: Lisa.melville@ahrprivatewealth.com

Personal data we may collect

The specific types of personal data we may collect and use about you will depend upon the extent to which you use our website facilities, or our services.

The types of information we collect directly from you are:

- Personal and financial information that is collected when we meet you in person or by telephone and when you complete our new client documentation and engage our services. Information such as your contact details, date of birth, residency status, employment and tax status, your national insurance number, passport/driving licence details as proof of identity and utility bill as proof of address. Sensitive Special Category data such as your race, ethnic origin, genetics, biometrics (where used for ID purposes), physical or mental health, sexual orientation, political and religious beliefs, or membership of groups such as trade unions. Your spouse's details (where relevant) including your spouse's: name; date of birth; nationality; occupation; or sensitive Special Category data as described above, and likewise, your children's and/or other dependants' details (where relevant) including their: name; date of birth; nationality; occupation; or sensitive Special Category data as described above.

- Important information that helps us to assess the suitability of our services for your needs such as details relating to your assets and liabilities and your financial goals and time horizon. In large part, this is information provided by you in our Fact Find document. In addition to this we also process your answers to our Attitude to Investment Risk Questionnaire in order to help us to understand your attitude to taking financial risks. This helps us to understand your needs and financial goals and builds a profile that assists us in tailoring our services for your needs. This takes place at the beginning of the relationship and periodically whilst you remain a client.

- Information on the source of your wealth and the source of the funds you have, in order to be able to receive our services and for regulatory reasons.

- We will collect information that helps us to contact you such as your name, email address and telephone number when you make enquiries or request information on our services through our website. We will retain information in respect of the services for which you request information.

- We will record all telephone conversations that we have with you for monitoring and quality purposes. The Financial Conduct Authority (FCA) requires us to retain phone conversation data for five years, after which time the data is destroyed. We don't use the recorded data for marketing purposes, nor do we share it with any third parties.

- When you are using our website, we will capture the information provided at the time of registering to use our site, subscribing to our service, posting material or requesting further information on our services. You may choose to email Lisa.melville@ahrprivatewealth.com requesting further information on our services or, if you are an existing client, you may request further information within our secure client area.

- We may also ask you for information regarding your user experience such as details on your browsing history when you report a problem using our website.

- If you contact us using any of the above methods, we may keep a record of that correspondence.

The types of information we collect from you automatically are:

- Details of your visits to our website including, but not limited to, traffic data, location data and other communication data, whether this is required for our own billing purposes or otherwise and the resources that you access. For more information on the data collected by these means please refer to our section on cookies below.

Aggregate/ Anonymous Data

We may aggregate and/or anonymise any personal data collected through the facilities, services or products offered so that such information can no longer be linked to you or your device. We may use this information for any purpose and may share this data with third parties

Personal data we obtain from third parties

We obtain information about you from third parties when we carry out Anti Money Laundering 'AML' Checks using credit and fraud prevention agencies. This will leave a 'soft footprint' on your credit history.

The data we obtain from the credit reference agency is collated by searching the records of multiple sources and is used to help us to assess the strength of the information you have supplied before we can accept you as a client. This includes identity verification and residential address verification, credit checks, sanctions check, and politically exposed persons checks. Criminal record checks, sanctions check, and politically exposed persons checks. These checks are carried out on any individual or entity associated with an account that will be investing monies/funds or instructing on these accounts. DBS checks are also carried out to ensure the people we hire do not have a criminal record in order to protect our clients and the business from potential criminal activity.

Why we collect and use your personal data

We, or our data processors, and other controllers to whom we provide your personal data, use your information for various purposes depending on the types of information we have collected from and about you and the specific facilities, services or products you use. In particular, we collect and process your information for the following purposes:

- To enter into contracts with you and carry out our obligations arising from any contracts entered into between you and us.
- To allow you to participate in interactive features of our service, when you choose to do so.
- To notify you about changes to our service.
- To provide you with information, products or services that you request from us or that we feel may interest you. In this latter case, we will only provide it where you have consented to be contacted for such purposes.

Our legal bases for processing your data

We only process personal data where we have a legal basis to do so. Please note that we may process your personal data for more than one legal ground, depending on the specific purpose for using your data.

The legal bases for our processing of your personal data are that the processing:

- is necessary for the performance of a contract with you (including to provide you with access to our Premium Content subscription service), or in order to take steps at your request prior to entering into a contract (for example providing the services and products you have engaged us to provide, providing you with website facilities, and providing initial information requested by you relating to our services and products)

- is necessary for compliance with a legal obligation to which we are subject (for example complying with anti-money-laundering rules, and our reporting requirements to the Financial Services Commission FSC

- is necessary for the purposes of our legitimate interests or those of third parties, provided these are not overridden by your rights and interests (for example, where we collect your information automatically, or you respond to a survey. Our legitimate interests are to provide security for our website, and operate our business and provide our services in the best way for our clients and ourselves)

- where we request it, your consent (for example, to provide marketing materials to you).

Whenever we process special categories of personal data (racial or ethnic origin, religious or political beliefs, physical or mental health, biometric data where used for ID purposes, or sexual orientation), our legal basis for processing will be your explicit consent (or that of your relevant family member/dependant), or that it is necessary for:

- reasons of substantial public interest, such as the prevention or detection of fraud, crime or other unlawful acts, or the data being necessary for an insurance purpose, and in accordance with appropriate safeguards; or

- the establishment, exercise or defence of legal claims.

Any processing relating to criminal convictions and offences or related security measures are for the substantial public interest, of preventing fraud, crime or other unlawful acts, and in accordance with appropriate safeguards.

Whenever we consider relying on legitimate interests, we consider and balance any potential impact on you (both positive and negative) and your rights. We do not process personal data where are interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted by law).

If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that information when requested, we may not be able to contract with you, or perform our contract with you (for example, to provide you with our products and services). In this case, we may have to terminate a contract with you, but we will notify you at the time if this would be the case.

How long we will retain your personal data

We will only keep your personal data for as long as we need to in order to fulfil the purposes for which it was collected, as set out in this Privacy Policy, and for as long as we are required to keep it by law. In order to ensure we meet our obligations , we have a designated data retention policy that relates to, but is not limited to, all physical documents, electronic versions of documents, digital voice recordings and data held in systems relating to Wealth Management Partners Group clients and indicates when personal information should be disposed of. For more information on this, contact our Data Protection Officer, Lisa Melville, as noted on Page 2 of this Privacy Notice. Wealth Management Partners Group securely disposes of personal data when it is no longer needed.

Cookies and similar technologies

When we collect information automatically, as stated above, we and our service providers use internet server logs, cookies, tags, Software Development Kit, tracking pixels and other similar tracking technologies. We use these technologies in order to offer you a more tailored experience in the future, by understanding and remembering your particular browsing preferences. As we adopt additional technologies, we may also gather information through other methods.

We also use cookies to measure the effectiveness of our marketing communications, for example they tell us if you have opened a particular marketing email.

For more information on the cookies we use, the purposes for which we use them and how you can control them please refer to our Cookies Policy on our website.

Marketing and research

You have choices when it comes to receiving marketing communications from us and taking part in market research. We will send you relevant news about our products and services in a number of ways including by email, but only if you have previously agreed to receive these marketing communications. You can unsubscribe at any time using the Unsubscribe button on any of our emails, or by contacting us info@wealthmanagementpartners.co.uk

We would also like to hear your views to help us to improve our services and products, so we may contact you for market research purposes. You always have the choice about whether to take part in our any of our surveys or market research.

Automated Decision Making

We do not undertake any fully automated decision making (i.e., without human intervention) in relation to you.

How to access and control your personal data - Your rights

You have certain rights with respect to your information which are summarised below. Some of the rights are complex therefore, not all details are included in the summary:

- Right to be informed: you can print a copy of this Privacy Policy by clicking the printer icon at the top of this page; or by requesting a printed version from your Financial Planning Team.

- Right of access: you can ask for copies of information that we process about you;

- Right to rectification: you can ask to have any inaccurate information we hold about you corrected;

- Right to erasure: you can ask for the information held about you to be erased (subject to certain criteria);

- Right to restriction of processing: you can ask us to restrict the processing of your information (under certain circumstances);

- Right to data portability: you can, under certain circumstances, request that we transmit your personal information that you have provided to us to you or another provider of services.

Your right to object

You can object to your information being processed if our legal basis for processing your information is based on "legitimate interests". To check whether we use your information for "legitimate interests" see the section "Why we collect and use your personal data" above.

If you would like to exercise any of your rights mentioned above, or to obtain more information about those rights, you can do so by writing or emailing our Data Protection Officer detailed above.

Your right to withdraw consent

Where you have provided consent for us to process your information, you can withdraw your consent at any time. Please note: withdrawal will not affect the lawfulness of processing prior to you withdrawing your consent. In some circumstances the withdrawal of your consent may mean we are unable to provide some or all of our services to you.

You can withdraw your consent to our use of your data by contacting our Data Protection Officer detailed above.

You can withdraw your consent to receive our marketing emails by using the unsubscribe button on our marketing emails or by notifying us by email: info@wealthmanagementpartners.co.uk

Your right to make a complaint

If you have a complaint about the way we process your personal data or think that we have not complied with your data privacy rights, this is also something we'd like to resolve with you directly if possible.

Please contact in the first instance our Data Protection Officer:

The contact details of our Data Protection Officer are:

Name: Lisa Melville: First Floor, Cockington House, Cockington Village, Torquay, United Kingdom, TQ2 6XA.
By phone: 01803 690 444
By email: Lisa.melville@ahrprivatewealth.com

You will be informed of changes to this policy by notification on our website.