

# **Privacy Notice**

This Privacy Notice explains how we use any personal information we collect about you through our website and offline through our interactions with you. We are required to comply with the General Data Protection Regulation (GDPR) and set out below the details as to how we process your data and your rights.

#### About us and contact details:

Wise Investments Limited (trading as Wise Investment) registered office is:

The Great Barn, Chalford Park Barns, Oxford Road, Chipping Norton, OX7 5QR

Email; wise@wiseinvestment.co.uk

### What information we will collect about you:

We collect information about you when you engage with us about our financial planning services. This information will relate to your personal and financial circumstances. It may also include special categories of personal data, such as data about your health, if necessary for our services.

We will ensure that you are provided with clear information as to why this information is required and the purposes for which it will be used.

We may receive data about you from other sources, such as public databases.

## Why we need to collect and use your data:

We need your data in order for us to:

- Provide financial planning services to you in accordance with this agreement which may include
  but not limited to giving you financial advice and making recommendations as to investments
  and financial products which are suitable for you, taking into account current financial markets
  and economic conditions, availability of products and the providers of those products, as well as a
  detailed analysis of your personal circumstances and requirements
- Comply with our regulatory obligations imposed by the Financial Conduct Authority in regard to the relevant 'Know Your Client' obligations. In addition, to comply with the Regulator's requirements for record keeping for the purposes of audits and reviews, records of transactions undertaken and customer histories for prescribed periods of time as directed
- Respond to any legitimate legal requests for information about you to the Regulatory authority or pursuant to an order of any court or tribunal having relevant jurisdiction, or as required by law for the purposes of but not limited to combatting fraud, money-laundering and criminal activities.
- Carry out our legitimate business and professional management responsibilities which include
  but are not limited to providing you with suitable advice, ensuring your portfolio and financial
  products continue to be suitable for you, adhere to anti money laundering requirements and
  investigating and resolving complaints.

# How we will use the information about you:

We collect information about you to provide you with the services for which you engage us.



## Who we might share your data with:

To enable us to deliver our services to you, we may pass your details to third parties for which we engage to support your needs, these could be, but not limited to:

- Investment & insurance providers
- Compliance consultants, product providers, legal services

We have contracts with these providers, and they will only use your data in a way that we have agreed, they will not market to you.

#### Security:

The security of your data is important to us. Where we need to share your data, we will use appropriate security measures to protect your data whilst in transit. To fulfil our legal obligations in respect of antimoney laundering other financial crime we may send your details to third party agencies for identity verification purposes.

## Holding your data:

We review the data we hold on you on a regular basis to ensure compliance with GDPR law. In the review we will:

- Delete any data which is trivial or transitory in nature, or which in our opinion is no longer required for the purposes set out above
- Update the data to ensure that any errors or inaccuracies are corrected
- Archive data as detailed below
- Subject to the data retention period, as described below, securely delete the data when it is identified that we no longer need to hold it

We may retain and process your data for the following periods. In the event that more than one period applies to the same data, we will retain the data to the last such period to expire:

- We will hold any agreements between you and us for a period of 6 years from the termination or expiry of the agreement unless we have been notified of any claim or circumstance which might give rise to a claim under or by reference to such agreements.
- We will process data relating to investments which we have provided advice on and / or arranged for you. We will process such data throughout the entire period you are and remain a client of the firm and for a period of not less than 6 years following our ceasing to provide service to you in regard to those investments. In the case of long-term investments, we may process your data until the date of maturation of such long-term investments.
- We will hold data as required by any Regulator until the end of any limitation period imposed by that Regulator, which in the case of the Financial Services Authority is currently 6 years for all types of business undertaken except for Occupational Pension Schemes, which can include Defined Benefit Transfers and Scheme Money Purchase Transfers, whereby the data retention period is indefinite.
- We will hold data as required by any relevant third party until the end of any limitation period imposed by that relevant third party, which in the case of HMRC shall be 7 years, unless we are notified that any period is considered "open" by HMRC in which case it will be until we are notified the period is "closed".



- We will hold data as required for the purposes of any legal proceedings for a period of 6 years
  following the conclusion of any such proceedings unless a longer period is required pursuant to any
  court rule or enactment. Proceedings will be taken to have concluded on the expiry of any period
  given for appealing any final judgment or on the date of concluding any settlement staying all
  relevant claims if the proceedings were settled before judgement.
- Save for the above, we will hold data for a maximum of 60 years from the date we receive the data.

### Your rights:

To remind you of your rights whereby you may:

- Request access to data of which you are the data subject
- Object to withdraw consent for, the processing of the same
- Obtain rectification of inaccurate data
- Prevent data processing for the purposes of direct marketing
- Object to decisions being taken by automated means and to have the logic behind those decisions clearly explained
- Request data erasure

You have the right to request a copy of the information that we hold about you. If you would like a copy of some or all of your personal information, please email or write to us at the contact details at the beginning of this document and mark it for the attention of the Compliance Officer.

## Complaints:

You have the right to lodge a complaint with the supervisory authority for data protection. In the UK this is:

Information Commissioners Office Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF

Telephone 0303 123 1113 (local rate)

# Changes to our privacy policy:

We will keep our privacy policy under regular review, and we will inform you of any changes when they occur. This privacy policy was updated on 17<sup>th</sup> November 2022.

#### Cookies Disclaimer:

We use cookies to track visitor use of the website and to complete statistical reports on website activity.

For further information visit our cookies policy:

https://wiseinvestment.co.uk/wp-content/uploads/2022/03/Cookie-Policy-1-Sep-2021.pdf