

Privacy Notice – 23 March 2018

Invest Southwest Ltd and Will Management Services Ltd are part of Invest Southwest Holdings Ltd. This privacy notice explains how we use any personal information we collect about you.

What information do we collect about you?

We collect information about you when you engage us for financial planning, financial advice, mortgage advice, investment management services and Wills and Will related services. This information will relate to your personal and financial circumstances. It may also include special categories of personal data (such as sensitive data) about your health, if this is necessary for the provision of our services.

We may also collect information when you voluntarily complete client surveys or provide feedback to us.

Why do we need to collect and use your personal data?

The primary legal basis that we intend to use for the processing of your data is for the performance of our contract with you. The information that we collect about you is essential for us to be able to carry out the services that you require from us effectively. Without collecting your personal data, we would also be unable to fulfil our legal and regulatory obligations.

Where special category data is required (such as sensitive data), we will obtain your explicit consent in order to collect and process this information.

How will we use the information about you?

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

Who might we share your information with?

If you agree, we may email you about other products or services that we think may be of interest to you. This includes passing on your personal information to Invest Southwest or Will Management Services accordingly so that collectively we may offer you a holistic service.

We will not share your information for marketing purposes with companies outside our group of companies or any other companies.

In order to deliver our services to you effectively we may send your details to third parties such as those that we engage for professional compliance, accountancy or legal services as well as product and platform providers that we use to arrange financial products for you.

Where third parties are involved in processing your data we will have a contract in place with them to ensure that the nature and purpose of the processing is clear, that they are subject to a duty of confidence in processing your data and that they will only act in accordance with our written instructions. Intelliflo, the company that provides our back office and client management software is one such company.

Where it is necessary for your personal data to be forwarded to a third party (for example if we are processing sensitive data), we will use appropriate measures to protect your personal data in transit, based on the consequences of losing such data.

To fulfil our obligations in respect of prevention of money-laundering and other financial crime we may send your details to third party agencies for identity verification purposes.

How long do we keep hold of your information?

In principle, your personal data should not be held for longer than is required under the terms of our contract for services with you. We are subject to regulatory requirements to retain data for specified minimum periods, however, we also reserve the right to retain data indefinitely, due to the possibility that it may be required to investigate a complaint made against us.

You have the right to request deletion of your personal data and we will be happy to comply with this request, subject to the restrictions of our regulatory obligations and legitimate interests as noted above.

How can I access the information you hold about me?

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 using the contact details noted below.

When your personal data is processed by automated means you have the right to ask us to move your personal data to another organisation for their use.

We have an obligation to ensure that your personal information is accurate and up to date. Please ask us to correct or remove any information that you think is incorrect.

Marketing

We would like to send you information about our products and services which may be of interest to you (note, *our* products and services, not those of any third party). If you have agreed to receive marketing information, you may opt out at a later date.

You have a right at any time to stop us from contacting you for marketing purposes. If you no longer wish to be contacted for marketing purposes, please contact us using one of the contact methods stated below.

Cookies

We use cookies to track visitor use of our websites and to compile statistical reports on website activity. For further information visit <http://www.allaboutcookies.org/>

Cookies are text files placed on your computer to collect standard internet log information and visitor behaviour information. We will use your information collected from our websites to personalise your repeat visits to the sites.

You can set your browser not to accept cookies and the above website tells you how to remove cookies from your browser. However, in a few cases some of our websites features may not function as a result.

Other websites

Our websites contain links to other websites. This privacy policy only applies to our websites so when you link to other websites you should read their own privacy policies.

What can you do if you are unhappy with how your personal data is processed?

In the first instance contact your Invest Southwest or Will Management Services adviser, however, you also have a right to lodge a complaint with the supervisory authority for data protection. In the UK this is:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF
0303 123 1113 (local rate)

Changes to our privacy policy

We keep our privacy policy under regular review. To check if you have the most recent copy you are welcome to contact your adviser.

How to contact us

Please contact your adviser if you have any questions about our privacy policy or information we hold about you. Should your adviser not be available, you can as an alternative contact our Compliance Officer/Will Manager:

- Invest Southwest
- Andy Ward
- 01823 353970
- andy@investsouthwest.co.uk
- 12 Hammet Street, Taunton, TA1 1RZ
- Will Management Services
- Linda Fisher
- 01823 336265
- Linda@willmanagement.co.uk
- 12 Hammet Street, Taunton, TA1 1RZ