GilesSmith®

Wealth Management

# Privacy Terms Disclosure

# Privacy terms disclosure

## Data protection

The information you have provided is subject to the General Data Protection Regulation (Regulation (EU) 2016/679) GDPR.

By agreeing to this document, you consent to us or any company associated with us, for example, product providers or platforms we use to provide you with our services, processing your personal data, both manually and by electronic means.

Your data will be used for the sole purpose of providing financial advice, administration and management.

"Processing" includes obtaining, recording or holding information or data, transferring it to other companies associated with us, such as product providers, the FCA or any other statutory, governmental or regulatory body for legitimate purposes including, where relevant, to solicitors and/or other debt collection agencies for debt collection purposes and carrying out operations on the information or data.

In order to provide services to you we may be required to pass your personal information to parties located outside of the European Economic Area (EEA) in countries that do not have Data Protection Laws equivalent to those in the UK. Where this is the case we will take reasonable steps to ensure the privacy of your information.

The information provided may also contain sensitive personal data for the purposes of the Act, including information that relates to your physical or mental health or condition; the committing or alleged committing of any offence by you; any proceedings for an offence committed or alleged to have been committed by you, including the outcome or sentence in such proceedings.

We are required by the anti-money laundering regulations to verify the identity of our clients, to obtain information as to the purpose and nature of the business which we conduct on their behalf, and to ensure that the information we hold is up-to-date. For this purpose we may use electronic identity verification systems and we may conduct these checks from time to time throughout our relationship, not just at the beginning.

When using electronic identity verification systems, we utilise the services of a Credit Reference Agency. For further information about Transunion and the information it holds, please follow the below link:

**https://www.callcredit.co.uk/legal-information/bureau-privacy-notice**

If at any time, should you wish to withdraw consent for us or any company associated with us to processing your personal data or sensitive personal data, please contact The Data Protection Officer on **01243 271291** or **kevin.smith@gswm.co.uk** or in writing at:

**GilesSmith Wealth Management LLP**
**27 East Street**
**Chichester**
**West Sussex**
**PO19 1HS**

You may also wish alter your marketing preferences by accessing your own personal client site. Log in details, to access your client site, will be provided once your registration is complete.

You may be assured that we and any company associated with us will treat all personal data and sensitive personal data as confidential and will not process it other than for a legitimate purpose associated with the service we will provide you. Steps will be taken to ensure that the information is accurate, kept up to date and not kept for longer than is necessary.

If we provide you with financial advice, your data will be kept in accordance with FCA regulatory expectations, which in some cases mean the duration could be indefinite.

Measures will also be taken to safeguard against unauthorised or unlawful processing and accidental loss or destruction or damage to the data.

Subject to certain exceptions, you are entitled to have access to your personal and sensitive personal data that is held by us.

You will not be charged for us supplying you with such data, however we do reserve the right to apply a 'reasonable fee' where requests are deemed excessive.

We will respond to your request as soon as possible and within the maximum time frame of one month.

## Data processing

1. Your data will be lawfully and fairly processed in a transparent manner.
2. Your data is collected on the grounds of explicit and legitimate purposes only.
3. We will only ask for your data when necessary, explain if data will be shared and how long it will be kept.
4. Your data will be accurate, kept up to date and erased, without delay, should your data no longer be required for the purposes to be processed.
5. Your data will only be retained for as long as is necessary.
6. Your data will be secure.

## Rights of the client

1. The right to be informed.
2. The right of access.
3. The right to rectification.
4. The right to erasure.
5. The right to restrict processing.
6. The right to data portability.
7. The right to object.
8. Rights to automated decision and profiling.

## Right to complain

In rare occasions where you believe your data has been wrongfully processed, stored or handled, you have the right to raise a concern with the Information Commissioner's Office (ICO).

Details on how to do this can be found here:

**https://ico.org.uk/your-data-matters/raising-concerns/**

## Communication and marketing preferences

Occasionally, we may send you marketing/promotional communications via email, telephone, SMS or the post. Recipients will be carefully selected, and information will only be sent where we feel it to be appropriate.

You will be asked your preferences for marketing when first logging into your client site.