THANKS WEALTH PLANNING

T: +44 (0)203 828 7107
M: +44 (0)756 352 9918
E: sam@thankswp.com
W: www.thankswp.com

Thanks Wealth Planning
3rd Floor
86-90 Paul Street
London
EC2A 4NE

Customer Privacy Notice

Why should you read this document?

During dealing with us, we will ask you to provide us with detailed personal information relating to your existing circumstances, your financial situation **(Your Personal Data)** and, in some cases, your health and family health history **(Your Special Category Data)**. This document is important as it allows us to explain to you what we will need to do with Your Personal Data and Your Special Category Data, and the various rights you have in relation to Your Data.

What do we mean by "Your Personal Data" and "Your Special Category Personal Data"?

Your Personal Data and Special Category Personal Data means any information that describes or relates to your personal circumstances. In the context of providing you with assistance in relation to our wealth planning services and your investment, pension, finance and/or insurance requirements Your Personal Data and Your Special Category Data may include:

Your Personal Data

- Title, name, date of birth, gender, nationality, civil/marital status, contact details, national insurance number, addresses, email address and documents that are necessary to verify your identity
- Employment and remuneration information, (including salary/bonus schemes/overtime/sick pay/other benefits), employment history
- Bank account details, tax information, loans and credit commitments, personal credit history, sources of income and expenditure, family circumstances and details of dependents
- Any pre-existing investment, pension, finance and/or insurance products and the terms and conditions relating to these

Your Special Category Personal Data

- Physical and mental health history
- Cultural or social identity
- Political opinions
- Racial or ethnic origin
- Religious and philosophical beliefs
- Sexual orientation or sex life
- Genetic or biometric data
- Health status and history, details of treatment and prognosis and medical reports

The basis upon which our firm will deal with Your Personal Data

When we speak with you about your wealth planning, investment, pension, finance and/or insurance requirements we do so on the basis that both parties are entering a contract for the supply of services. In order to perform that contract, to arrange the products you require and to act for you in our capacity as your wealth planner, we have the right to use Your Personal Data for the purposes detailed to follow.

Alternatively, either in the course of initial discussions with you or when the contract between us has come to an end for whatever reason, we have the right to use Your Personal Data provided it is in our legitimate business interest to do so and your rights are not affected. For example, we may need to respond to requests from insurance providers and our Compliance Service Provider relating to the advice we have given to you, or to contact you to seek feedback on the service you received.

On occasion, we will use Your Personal Data for contractual responsibilities we may owe our regulator, The Financial Conduct Authority, or for wider compliance with any legal or regulatory obligation to which we might be subject. In such circumstances, we would be processing Your Personal Data in order to meet a legal, compliance or other regulatory obligation to which we are subject.

How do we collect Your Personal Data?

We will collect and record Your Personal Data from a variety of sources, but mainly directly from you. We may also collect Special Category Personal Data from you. You will usually provide information during our initial meetings or conversations with you to establish your circumstances and needs and preferences in relation to wealth planning, investment, pension, finance and/or insurance. You will provide information to us verbally and in writing, including email.

We may also obtain some information from third parties, for example, credit checks, information from your employer, and searches of information in the public domain such as the voters roll. If we use technology solutions to assist in the collection of Your Personal Data for example software that can verify your credit status we will only do this if we have consent from you for us or our nominated processor to access your information in this manner. With regards to electronic ID checks we would not require your consent but will inform you of how such software operates and the purpose for which it is used.

What happens to Your Personal Data when it is disclosed to us?

While handling Your Personal Data, we will:

- Record and store Your Personal Data in our paper files, mobile devices and on our computer systems (*websites, email, hard drives, and cloud facilities*) including third party financial services software/systems we use as part of our obligations and wealth planning services to you. This information can only be accessed by employees and consultants within our firm and only when it is necessary to provide our service to you and to perform any administration tasks associated with or incidental to that service.
- Submit Your Personal Data to Product Providers and/or Insurance Product providers, both in paper form and on-line via a secure portal but only if required for the arrangement and upkeep of investment, pension, finance policies and/or insurances in your name. The provision of this information to a third party is essential in allowing us to progress any enquiry or application made on your behalf and to deal with any additional questions or administrative issues that lenders and providers may raise.
- Use Your Personal Data for the purposes of responding to any queries you may have in relation to any investment, pension, finance and/or insurance you may take out, or to inform you of any developments in relation to those products and/or polices of which we might become aware.

Sharing Your Personal Data

Where required your Personal Data will be shared with:

- Investment, pension, finance, and insurance providers, you have an interest with or apply to have an interest with

- Third party financial services software/systems providers we use as part of our obligations and services to you specifically including external software provider MoneyInfo Ltd (registered in England & Wales company number 3508395, who we licence technology from to deliver our service to you
- Our compliance advisers
- Our regulator

In each case, Your Personal Data will only be shared for the purposes set out in this Customer Privacy Notice and only where our regulatory, servicing, legal and contractual responsibilities require it i.e. to progress your investment, pension, finance and/or insurance enquiry and to provide you with our professional services or if we are legally obliged to so.

We may, from time to time and with your express permission, share Your Personal Data with other third parties who we believe will be able to assist us with your enquiry or application, or who are able to support your needs as identified. These third parties will include but may not be limited to, product specialists, solicitors, accountants, estate agents, providers of legal services such as estate planners, conveyancing, mortgage brokers, surveyors and valuers (in each case where we believe this to be required due to your particular circumstances). We will not share Your Special Category Personal Data and Your Personal Data with any Third Party unless you give us express permission to do so.

Please note that this sharing of Your Personal Data does not entitle such third parties to send you marketing or promotional messages: it is shared to ensure we can adequately fulfil our responsibilities to you, and as otherwise set out in this Customer Privacy Notice.

We do not envisage that the performance by us of our service will involve Your Personal Data being transferred outside of the European Economic Area.

Security and retention of Your Personal Data

Your privacy is important to us and we will keep Your Personal Data and Your Special Category Personal Data secure in accordance with our legal responsibilities. We will take reasonable steps to safeguard Your Personal Data and Your Special Category Personal Data against it being accessed unlawfully or maliciously by a third party.

We also expect you to take reasonable steps to safeguard your own privacy when transferring information to us, such as not sending confidential information over unprotected email, ensuring email attachments are password protected or encrypted and only using secure methods of postage when original documentation is being sent to us.

Your Personal Data and Your Special Category Personal Data will be retained by us either electronically or in paper format for a minimum of six years, or in instances whereby we have legal right to such information we will retain records indefinitely.

The basis upon which we will process Your Special Category Personal Data

We will use Special Category Personal Data and any Criminal Disclosures in the same way as Your Personal Data generally, as set out in this Privacy Notice, but only if required to do so to follow our obligations, legal and regulatory requirements, otherwise it is generally not required by us and we won’t need to use it. We will only use Your Special Category Data where our regulatory, legal and contractual responsibilities require it and we will ask for your express permission to use Your Special Category Personal Data.

For example; where you ask us to assist you with your wealth planning, investment, pension, finance and/or insurance, in particular life insurance and insurance that may assist you in the event of an accident or illness, we may ask you for information about Your Special Category Personal Data, if required to do so. We will record and use Your Special Category Personal Data in order to make enquiries to investment, pension, finance and/or insurance providers in relation to products that may meet your needs and to provide you with advice and/or guidance regarding the suitability of any product that may be available to you.

If you have parental responsibility for children under the age of 13, it is also very likely that we will record information on our systems that relates to those children and potentially, to their Special Category Personal Data, only if required to do so.

The arrangement of certain types of insurance may involve disclosure by you to us of information relating to historic or current criminal convictions or offences (together "**Criminal Disclosures**"). This is relevant to insurance related activities such as underwriting, claims and fraud management.

Information on Your Special Category Data and Criminal Disclosures must be capable of being exchanged freely between insurance intermediaries such as our Firm, and insurance providers, to enable customers to secure the important insurance protection that their needs require.

Your rights in relation to Your Personal Data and Your Special Category Personal Data

You can:

- request copies of Your Personal Data and Your Special Category Personal Data that is under our control
- ask us to further explain how we use Your Personal Data and Your Special Category Personal Data
- ask us to correct, delete or require us to restrict or stop using Your Personal Data and Your Special Category Personal Data (details as to the extent to which we can do this will be provided at the time of any such request)
- ask us to send an electronic copy of Your Personal Data and Your Special Category Personal Data to another organisation should you wish
- change the basis of any consent you may have provided to enable us to market to you in the future (including withdrawing any consent in its entirety)

How to contact our Firm in relation to the use of Your Personal Data

If you have any questions or comments about this document, or wish to make contact in order to exercise any of your rights set out within it please contact:

- Sam Whybrow: 0203 828 7107, sam@thankswp.com or Thanks Wealth Planning, 3rd Floor, 86-90 Paul Street, London, EC2A 4NE

If we feel we have a legal right not to deal with your request, or to action, it in different way to how you have requested, we will inform you of this at the time. You should also contact us as soon as possible on you becoming aware of any unauthorised disclosure of Your Personal Data or Your Special Category Personal Data, so that we may investigate and fulfil our own regulatory obligations. If you have any concerns or complaints as to how we have handled Your Personal Data you may lodge a complaint with the UK's data protection regulator, the ICO, who can be contacted through their website at https://ico.org.uk/global/contact-us/ or by writing to Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.

THANKS
WEALTH PLANNING

Data Subject Consent Form

I hereby grant Thanks Wealth Planning permission to process my personal data for the purpose stated in the Customer Privacy Notice above.

Signed:

Print Name:

Date:

Marketing Consent

I hereby grant Thanks Wealth Planning permission to process my personal data for the purpose of Marketing. By providing your consent, you agree that you have given your express permission for us to market you regarding products and services that we think may be of interest to you and by any means of communication that is suitable at the time.

IMPORTANT NOTES: Marketing by our Firm

If you do not indicate your agreement for **us** to contact you, we may be unable to provide you with details of products and/or services that may suit your needs and circumstances.

We would like to maintain a record of your express consent for **us** to contact you by post, telephone, SMS, email and instant messaging for marketing our products or services that we think may be of interest to you. Please indicate your consent to **us** contacting you by any of the means specified below:

Post ☐ Phone ☐ SMS ☐ Email ☐ Instant Messaging* ☐

*Whatsapp or similar service.

Signature: Date: