



PRIVACY POLICY

Womble Bond Dickinson Wealth Limited



Contents

1. Introduction
2. Glossary of key terms used in this Privacy Policy
3. What Personal Information do we collect and use?
4. How Personal Information is collected and your responsibilities
5. Personal Information for children
6. Visitors to our Website
7. How and why we use your Personal Information
8. Marketing communications
9. Who we share your Personal Information with
10. Where your Personal Information is held
11. Transferring your Personal Information out of the EEA
12. How long your Personal Information will be kept
13. How we protect your Personal Information
14. Your rights in respect of your Personal Information
15. How to complain
16. Contact Information
17. Additional support



We take our obligations under privacy and data protection law very seriously.



1. Introduction

We take our obligations under privacy and data protection law very seriously. This Privacy Policy is designed to help you understand what Personal Information we collect, why, how we use it and who we share it with. It also explains the rights you have in connection with your Personal Information, including how to contact us or to make a complaint.

This policy applies to Womble Bond Dickinson Wealth Limited (WBDW), who we also refer to throughout as "we", "us" or "our". Please see paragraph 16 for our contact information.

WBDW is registered as a data controller with the Information Commissioner's Office, which is the UK's independent body set up to uphold information rights. As a data controller we are responsible for ensuring that when we process Personal Information we comply with EU and UK data protection law and use it in accordance with our client's instructions and our professional duty of confidentiality.

If you have any questions about this policy please get in touch with your usual WBDW contact or by using the contact information in paragraph 16.

This Privacy Policy may change from time to time and in response to guidance and best practice advice issued by the Information Commissioner's Office in particular in response to the change in data protection law in the UK on 25 May 2018. We will inform you of changes via our website and if you are a client we will inform you of any key changes in writing. This Privacy Policy was last updated on 22 May 2018.

2. Glossary of key terms used in this Privacy Policy

We, us, our	Womble Bond Dickinson Wealth Limited
Data Processing Manager	Kevin Gray (see paragraph 16 for contact information).
Matter	Financial advice and investments on your particular matter
Personal Information	Also referred to as 'Personal Data' and means information about a living person by which that person can be identified. Some of that information will identify the individual directly, for example by giving their name and email address. It may also be possible to identify someone indirectly, from information in which their name is not given, for example by naming their job title and employer, or by using another form of identifier such as their IP address. See paragraph 3, 'What Personal Information we do collect and use', for examples of the type of information which would fall within this definition.

Special Category Personal Information	Personal information revealing racial or ethnic origin, political opinions, religious beliefs, philosophical beliefs or trade union membership, genetic and biometric data, data concerning health, sex life or sexual orientation.
WBDW Entity	Womble Bond Dickinson Wealth Limited (WBDW) is a wholly owned subsidiary of Womble Bond Dickinson (UK) LLP (WBD UK). WBD UK is, along with Womble Bond Dickinson (US) LLP (WBD US), a member of Womble Bond Dickinson (International) Limited. Womble Bond Dickinson (International) Limited does not practice law. WBD UK and WBD US operate as independent and autonomous law firms.
Website	the website at this address www.womblebond Dickinsonwealth.com .

3. What Personal Information do we collect and use?

The type of Personal Information we collect and process depends on our relationship with you and the context in which we obtain and use it. The lists below set out the Personal Information we will or may collect depending on the circumstances.

Clients

Where we are providing regulated financial services including investment advice and financial planning, we will require certain Personal Information to be able to provide our service to you. If you do not provide the Personal Information we ask for, it may delay or prevent us from providing services to you.

The Personal Information we will collect is as follows:

- Your name, address and telephone number
- Your nationality
- Your National Insurance and tax details
- Information to enable us to check and verify your identity, eg your date of birth or passport details
- Electronic contact details, eg your email address and mobile phone number
- Your bank and/or building society details
- Your employment status and details including salary and benefits
- Details of your financial situation such as tax information, loans and credit commitment and sources of income and expenditure
- Details of any pre-existing financial products such as investments, mortgages and insurance
- Details of your family circumstances including spouse/partner, dependants or other relevant family members

- Details about your health status and history including whether you smoke and if there are any pre-existing conditions
- Any other information in relation to your personal and financial circumstances that is considered necessary to provide suitable financial advice
- Information about your use of our IT, communication and other systems, and other monitoring information, eg if you use our secure online client portals or leave a voicemail message.

The Personal Information that we may collect depending on our relationship with you is as follows:

- If you are a business client, information provided by you about other individuals in connection with the advice we are providing to your business, eg information relating to your employees.

Business development and Website use

If we are providing you with regulated financial services, if we have or would like to have a business relationship with you or if you visit our Website, your Personal Information will be used to develop our business and the services we provide.

The Personal Information we will collect is as follows:

- Details about the services or business updates you specifically request
- Technical Personal Information in connection with details of your visits to our Website including your internet protocol (IP) address used to connect your computer to the Internet, browser type and version, time zone setting, browser plug-in types and versions, operating systems and platforms (see paragraph 6 'Visitors to our Website')

The Personal Information that we may collect depending on our relationship with you is as follows:

- Details of your professional online presence, eg LinkedIn profile
- Your occupation and interests and professional information (such as job title, previous positions and professional experience)
- Information you provide to us about our services, for example by completing client surveys
- Details of your name, email address and service and marketing preferences if you subscribe to our updates and communications via our Website. We will collect your age if you are applying to us for work experience so that we can ensure the appropriate risk assessments are in place.

4. How Personal Information is collected and your responsibilities

We will collect Personal Information from you in person when we meet you, via telephone calls or through correspondence with you in relation to your Matter and via our Website (see paragraph 6 'Visitors to our Website').

The sources we may also collect Personal information from include:

- publicly accessible sources, eg Companies House;
- direct from a third party, eg from a client (such as information about their employees or a family member) or from sanctions screening providers and client due diligence providers;
- a third party with your consent, eg, your bank or building society, another financial institution or advisor; consultants and other professionals we may engage in relation to your Matter; your employer, professional body or pension administrators;
- our information technology systems, eg, case management, document management and time recording systems; door entry and reception logs; our Website, other relevant websites and applications; and
- automated monitoring of our Website and other technical systems, such as our computer networks and connections, CCTV (controlled by our landlords) and access control systems, communications systems, email, voicemail and instant messaging systems.

When we provide our services to you, we may hold and use Personal Information about you, your officers and/or your employees or other third parties. When you provide Personal Information to us relating to a third party you confirm that you have any necessary permission or authority to do so. You are also responsible for ensuring that the provision of that Personal Information complies with data protection and other applicable law.

In personal matters you may be providing other third party data to us, for example details of your family members. You must have the authority to disclose personal data if it relates to someone else and all data disclosed should be complete, accurate and up to date.

5. Personal Information of children

If your Matter involves children, these children must be represented by their parents or guardians. In these circumstances we will explain to the parent or guardian why we need any Personal Information relating to the children and how it will be used, both when we first collect the data and as the particular Matter progresses.

6. Visitors to our Website

We use Google Analytics to collect statistical information about the number of visitors to our Website. This information includes, pages visited and content searched. Further information can be obtained from the Google privacy policy - <https://policies.google.com/privacy>. We use this information to maintain and improve our Website and the services we provide and to analyse and understand what is of interest to our Website visitors so we can improve and tailor the content and this data will not directly or indirectly reveal your identity.

We use technology to track the patterns of behaviour of visitors to our Website. This can include using a cookie which would be stored on your browser or the hard drive of your computing device. Please read our Cookies Policy (<https://www.womblebonddickinsonwealth.com/cookies-policy>) for more information about how we use cookies and similar technologies.

Our Website is not intended for children and, other than in connection with work experience applicants we do not knowingly collect data relating to children via the Website.

7. How and why we use your Personal Information

Under data protection law, we can only use your Personal Information if we have a proper reason for doing so, for example:

- to comply with our legal and regulatory obligations;
- for our legitimate interests (see below) or those of a third party;
- for the performance of our contract with you or to take steps at your request before entering into a contract; or
- you have given consent.

A legitimate interest is when we have a business or commercial reason to use your Personal Information, so long as this is not overridden by your own rights and interests. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your Personal Information for our legitimate interests.

We do not use your Personal Information for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).

The table below explains what we use your Personal Information for and our reasons for doing so. In general terms we will collect Personal Information to:

- to provide financial advice and financial planning services to you, to manage our relationship and comply with our legal and regulatory obligations arising from it;
- provide you with information about our business and the services we offer including relevant communications; and/or
- help us improve our business and the services we offer.

“

We make sure we consider and balance any potential impact on you and your rights before we process your Personal Information.

”

What we use your Personal Information for	Our reasons
To provide financially regulated services to you including financial planning and financial advice	For the performance of our contract with you or to take steps at your request before entering into a contract
<p>Conducting checks to identify our clients and verify their identity</p> <p>Screening for financial and other sanctions or embargoes to help detect and prevent financial crime</p> <p>Other processing necessary to comply with professional, legal and regulatory obligations that apply to our business, eg under health and safety regulation or rules issued by our professional regulator, the Financial Conduct Authority</p>	<p>To comply with our legal and regulatory obligations and for our legitimate interests or those of a third party</p> <p>Any Personal Information we receive from you for the purpose of preventing money laundering and/or terrorist financing will be used only for that purpose or with your express consent, or as permitted by or under another enactment.</p>
Gathering and providing information required by or relating to audits, enquiries or investigations by regulatory bodies	To comply with our legal and regulatory obligations
Ensuring our business policies are adhered to, eg policies covering security and internet use	For our legitimate interests or those of a third party
Operational reasons, such as improving our business and services by undertaking analysis and research and assessing your satisfaction with our services, efficiency, insurance purposes, training and quality control	For our legitimate interests or those of a third party
To respond to any complaint or allegation of negligence made against us	<p>For our legitimate interests or those of a third party</p> <p>To comply with our legal and regulatory obligations</p>
Statistical analysis to help us manage our business e.g. in relation to our financial performance, client base, work type or other efficiency measures or key performance indicators	For our legitimate interests or those of a third party
Preventing unauthorised access and modifications to systems	<p>For our legitimate interests or those of a third party</p> <p>To comply with our legal and regulatory obligations</p>

What we use your Personal Information for	Our reasons
Updating and maintaining client records	For the performance of our contract with you or to take steps at your request before entering into a contract To comply with our legal and regulatory obligations For our legitimate interests or those of a third party
Statutory and regulatory returns	To comply with our legal and regulatory obligations
Ensuring safe working practices, staff administration and assessments and to enforce or protect any of our rights, property or safety (or those of our members, employees or clients)	To comply with our legal and regulatory obligations For our legitimate interests or those of a third party
To contact you about our services and events which we think may be of interest to you, and to provide you with relevant updates and briefings	For our legitimate interests or those of a third party
For the audit of our accounts	To comply with our legal and regulatory obligations For our legitimate interests or those of a third party
With your consent and for external audits	For our legitimate interests or those of a third party

The information above does not apply to any Special Category Personal Information which you may have provided to us (see below).

The basis upon which we will process certain parts of your Personal Information

Sometimes our service may involve assisting you with certain aspects of your financial requirements such as insurance, in particular life insurance and insurance that may assist you in the event of an accident or illness. In these circumstances we will ask you information about your ethnic origin, your health and medical history (your Special Category Personal Information).

We will record and use your Special Category Personal Information in order to assess whether you have a financial need and in order to make enquiries of insurance and investment providers in relation to insurance products that may meet your needs and to provide advice regarding the suitability of any product that may be available to you.

We will only process your Special Category Personal Information with express consent from you.

If you have parental responsibility for children under the age of 13, it is likely that we may record their Special Category Personal Information. We will use your Special Category Personal Information in the same way as your Personal Information generally, as set out in this Privacy Policy.

Change of purpose

We will only use your Personal Information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your Personal Information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

We may process your Personal Information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

8. Marketing communications

We may use your Personal Information to send you updates (by email, telephone or post) about developments in financial markets and financial regulation that might be of interest to you and/or information about our services, including new services.

We have a legitimate interest in processing your Personal Information for our business development purposes (see paragraph 7 'How and why we use your Personal Information'). This means we do not usually need your consent to send you updates and information about our services. However, where consent is needed (for example to send you electronic communications), we will ask for this consent separately and clearly.

We will always treat your Personal Information with the utmost respect and, other than with the WBD Entities, we will never sell or share it with other organisations for marketing purposes.

You have the right to opt out of receiving marketing communications at any time by:

- getting in touch with your usual contact within the team, who will update our records accordingly.
- contacting our data processing manager (see paragraph 16 for the contact details).

We may ask you to confirm or update your marketing preferences if you instruct us to provide further services in the future, or if there are changes in the law, regulation, or the structure of our business.

“

We will always treat your Personal Information with the utmost respect.

”

9. Who we share your Personal Information with

We share Personal Information with:

- external investment and insurance providers who we instruct on your behalf in order to carry out investment advice as agreed by you. 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 providers may raise.
- 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, for example to obtain personalised pension illustrations.
- WBD Entities (eg to enable us to conduct conflict searches);
- our insurers and brokers;
- the audit of our accounts;
- our bank/s;
- external service suppliers, representatives and agents that we use to make our business more efficient, eg typing services, marketing agencies, document collation or analysis suppliers; and
- where we have your consent to do so, with our external auditors in relation to any quality certifications.

Our IT support and service providers may also access your Personal Information as a consequence of them providing support to us.

We only allow our service providers to handle your Personal Information if we are satisfied they take appropriate measures to protect your Personal Information. We also impose contractual obligations on service providers to ensure they can only use your Personal Information to provide services to us and to you.

We may disclose and exchange information with law enforcement agencies and regulatory bodies to comply with our legal and regulatory obligations.

We may also need to share some Personal Information with other parties. For example, if we, in the course of our own business operations, sell or buy any business or assets we may disclose Personal Information held by us to the prospective seller or buyer of those businesses or assets. Where possible, information will be anonymised but the recipient of the information will be bound by confidentiality obligations. If we are acquired, or substantially all of our assets are acquired, by a third party (or are subject to a reorganisation), Personal Information held by us will be one of the assets which is transferred.

10. Where is your Personal Information held

Information may be held at our offices, those of other WBD Entities, third party agencies, service providers, representatives and agents as described in paragraph 9, 'Who we share your Personal Information with'. We also hold your Personal Information in secure data centres in the UK.

Some of the third parties may be based outside the European Economic Area (EEA). For more information, including on how we safeguard your Personal Information when this occurs, see paragraph 11, 'Transferring your Personal Information out of the EEA', and paragraph 13, 'How we protect your Personal Information' .

11. Transferring your Personal Information out of the EEA

To deliver services to you, it might be necessary for us to share your Personal Information outside the European Economic Area (EEA), eg:

- with WBD Entities with offices outside the EEA;
- with your and our service providers located outside the EEA;
- if you are based outside the EEA;

These transfers are subject to special rules under European and UK data protection law. In those circumstances, we undertake an assessment of the level of protection in light of the circumstances surrounding the transfer. We will make sure that any transfers are not repetitive and only limited to the minimum amount of information possible and will always take steps to ensure that your Personal Information is adequately protected. In certain circumstances we may need to seek your consent unless there is an overriding legal need to transfer the Personal Information.

Where necessary we have entered into standard European Commission approved model data protection clauses with other WBD Entities (see paragraph 2 'Glossary of key terms' for an explanation of what we mean by WBD Entities), which have offices located outside of the EEA and with our external service providers and business partners in relation to the services they provide which may involve processing Personal Information for which we are the data controller from locations outside the EEA.

Our current IT support is provided from across the world and when support is provided remotely, your Personal Information may be accessed from and therefore transferred to that country. One of the countries to which we may transfer Personal Information in connection with IT support is Canada; this has been assessed by the European Commission as providing an adequate level of protection for Personal Information. We also receive IT support from the USA, South Africa and Australia and these do not have the same data protection laws as the United Kingdom and EEA. We will, however, ensure the transfer complies with data protection law and all Personal Information will be secure.

12. How long your Personal Information will be kept

We will only retain your Personal Information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, accounting, or reporting requirements.

When it is no longer necessary to retain your Personal Information, we will delete or anonymise it. In some circumstances we may anonymise your Personal Information (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

To determine the appropriate retention period for Personal Information, we consider the amount, nature, and sensitivity of the Personal Information, the potential risk of harm from unauthorised use or disclosure of it, the purposes for which we process your Personal Information and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances you can ask us to delete your data, see paragraph 14 'Your rights with respect to your personal information'.

Clients

We only keep your Personal Information about your Matter for as long as is necessary to:

- carry out our services for your Matter;
- respond to any questions, complaints or claims made by you or on your behalf;
- show that we treated you fairly; and/or
- keep records required by law to comply with our legal obligations and our duties to our regulator. Anti-money laundering legislation requires us to retain records, documents and information relating to a Matter, including a copy of your identity documentation, for five years from conclusion of your Matter or when our business relationship with you ends.

For most types of Matters we retain your matter file, which will include your Personal Information, for up to fifteen years from the date of your final bill although this may vary depending on the nature of your Matter. Further information about the likely retention period will be provided to you when your Matter concludes.

Where your matter relates to personal pensions and / or pension transfers, opt outs or conversions then we are required, by our regulator the Financial Conduct Authority, to retain this information indefinitely.

Complaints or requests

If you are not a client of ours but you complain to us about how we have processed your Personal Information or you seek to exercise a data protection right such as a data subject access request, we will retain details of your complaint or request. We will only use the Personal Information we collect to process the complaint or request, to audit the level of service we have provided and to provide information to our insurers or regulator.

We will keep information in connection with the complaint or request in line with our retention policy. In most cases this means we will retain the information for six years.

13. How we protect your Personal Information

Keeping information secure is a key part of data protection compliance. We have put in place appropriate security measures to prevent your Personal Information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your Personal Information to those employees, agents, contractors and other third parties who have a business need to know and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so or where we have otherwise agreed with you that we will.

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. If we have given you a username and password which allows you to access certain parts of your Matter via our systems, you are responsible for keeping it confidential.

14. Your rights in respect to your Personal Information

You are entitled at any time to ask us for a copy of Personal Information we hold about you, known as a data subject access request. You are also entitled to ask that any information we hold about you is supplemented, updated or rectified. You can make any of these requests free of charge by contacting us (see paragraph 16 for our contact details).

In certain circumstances you can also ask us to restrict our processing of your Personal Information, eg if you contest the accuracy of it. We will always review your request and will inform you if we decide we are not required to action it. If you require us to restrict or stop processing your Personal Information in any way, this may impact on our ability to provide our financial services to you. Depending on the nature of your request we may have to stop acting for you but you will still have to pay any unpaid fees and disbursements which we have incurred on your behalf to date.

You are entitled to ask that we send a copy of the Personal Information we hold about you to another organisation for your own purposes, for example if you intend to instruct another service provider instead of us. If you want us to move, copy or transfer your Personal Information in these circumstances, please let your usual WBDW contact know or contact us (see paragraph 16 for our contact information). We will aim to respond to your request within one month once we have assessed how feasible your request is, taking into account the technical capability of the other organisation involved.

“

We have put in place appropriate security measures to prevent your Personal Information from being accidentally lost, used or accessed in an unauthorised way.

”

For further information on each of those rights, including the circumstances in which they apply, please contact us or see the Guidance from the UK Information Commissioner's Office (ICO) on individuals' rights under the General Data Protection Regulation (<https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>)

We do not use your Personal Information for automated decision making.

15. How to complain

We hope that we can resolve any query or concern you may raise about our use of your information. If you want to complain about how we have handled your Personal Information, please follow the procedure in our Complaints Policy which is available on our legal notices on the Website.

We will investigate your complaint but if you are not satisfied with our response or believe we are processing your Personal Information unlawfully, you can complain to the UK Information Commissioner's Office. Further information is available on the ICO website at www.ico.org.uk/concerns or telephone 0303 123 1113.

The EU General Data Protection Regulation also gives you the right to lodge a complaint with a supervisory authority, in particular in the European Union (or EEA) State where you work, normally live or where any alleged infringement of data protection laws occurred. The UK supervisory authority is the Information Commissioner.

16. Contact Information

Please contact us or our Data Processing Manager by post, email or telephone if you have any questions about this Privacy Policy or the information we hold about you.

Our contact information

information@wbdw-uk.com

Our helpdesk – 0191 279 9468

Our Data Processing Manager's contact details

Kevin Gray
Womble Bond Dickinson Wealth Limited
St Ann's
112 Quayside
Newcastle upon Tyne
NE1 3DX

Email address and telephone number as above.

17. Additional support

If you would like this notice in another format (for example large print) please contact us using the details above.



Womble Bond Dickinson Wealth Limited is a limited company registered in England and Wales under no: 8375875. Registered office:
4 More London Riverside, London, SE1 2AU.

Womble Bond Dickinson Wealth Limited is authorised and regulated by the Financial Conduct Authority.