



*Whateley*

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WEALTH MANAGEMENT

ONLINE PRIVACY and  
COOKIE POLICY

Whateley Wealth Management Ltd  
3 Parsonage Drive, Cofton Hackett, Birmingham, B45 8AS.  
Whateley Wealth Management Ltd is authorised and regulated  
by the Financial Conduct Authority.  
Registered in England and Wales number: 09125961  
Tel: 0121 285 8528 Email: [info@whateleywm.co.uk](mailto:info@whateleywm.co.uk)

# Online (Data Protection) Privacy and Cookie Policies

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The Financial Conduct Authority (FCA) regulates financial services in the UK and you can check our authorisation and permitted activities on the Financial Services Register by visiting the FCA’s website [www.fca.org.uk/firms/systems-reporting/register](http://www.fca.org.uk/firms/systems-reporting/register) or by contacting the FCA’s website [www.fca.org.uk/firms/systems-reporting/register](http://www.fca.org.uk/firms/systems-reporting/register) or by contacting the FCA on 0800 111 6768. Our Financial Services Register number is 715678

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# Data Protection / Client Privacy Policy

## What is Personal Data?

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**IMPORTANT -  
Why you should  
read this**

During the course of dealing with us, we will ask you to provide us with detailed personal information relating to your existing circumstances, your financial situation and, in some cases, your health and family health history. (**Your Personal Data**).

This document is important as it allows us to explain to you what we will need to do with Your Personal Data – and the various rights you have in relation to Your Personal Data.

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**Definition**

Any information that describes, or relates, to your personal circumstances. Your Personal Data may identify you directly or indirectly.

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**Examples of  
Direct Personal  
Data**

Your name and address; your date of birth and your National Insurance number could be used to identify you directly

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**Examples of  
Indirect  
Personal Data**

Any of the following information could identify you indirectly:  
Employment situation  
Physical and mental health history  
Any other information that could be associated with your cultural or social identity.

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**Context**

In the context of providing you with assistance in relation to your Investment; mortgage or Insurance requirements Your Personal Data may include:

- Title and names, Date of birth and gender, Nationality
- Civil / marital status
- Address and Contact details
- 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 dependants
- Health status and history, details of treatments and prognosis, medical reports (further details are provided below specifically with regard to the processing we may undertake in relation to this type of information)
- Any pre-existing investment/mortgage and/or insurance products and the terms and conditions relating to these.

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# How we deal with Your Personal Data

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## Overview

When we speak to you about your investment/mortgage 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, and to arrange the products you require, we have the right to use Your Personal Data for the purposes detailed below.

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## Legitimate Business Interest

Either in the course of our 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 interests to do so and your rights are not affected. Examples include:

- We may need to respond to requests from mortgage lenders, insurance providers and our Compliance Service provider relating to the advice that we have given to you
- To make contact with 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 may 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.

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## How we will process Your Personal Data

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### Your Request

Where you ask us to assist you with your:

- insurance/ ethical investment
- life insurance
- insurance that may assist you in the event of an accident or illness

We will ask you information about your ethnic origin, your health and medical history (**Your Special Data**).

We will use Your Special Data in order to make enquiries of insurance/investment providers in relation to insurance/investment products that may meet your needs and to provide you with advice/guidance regarding the suitability of any product that may be available to you.

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### Parental Responsibility

If you have parental responsibility for children under the age of 13 it is also very likely that we will record information in our systems that relates to those children and potentially, to their Special Data.

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### Criminal Disclosure

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.

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### How we will use Special Data and Criminal Disclosures

We will use Special Data and Criminal Disclosures in the same way as Your Personal Data generally, as set out in this Privacy Notice.

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

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## How we will collect Your Personal Data

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### Source of Your Personal Data

We will collect and record Your Personal Data from a variety of sources, but mainly directly from you.

You will usually provide information through the course of our initial meetings, or conversations with you to establish your circumstances, needs and preferences in relation to investment/ mortgages / finance and insurance.

You will provide information to us verbally and in writing, including email.

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### Third Parties

We may also obtain some information from third parties, for example:

- Credit checks
  - Information from your employer(s)
  - Searches of information in the public domain, for example the electoral roll
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### Your Consent

If we, or our nominated processor, use technology solutions to assist in the collection of Your Personal Data, for example software that is able to verify your credit status, then we will only do this if we have your consent.

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.

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## What happens to Your Personal Data when it has been disclosed to us?

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**Storage** In the course of handling Your Personal Data we will record and store Your Personal Data in our paper files, mobile devices and on our computer systems (website, email, hard drives and cloud facilities).

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**Access** The stored information can only be accessed by our 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.

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**Submissions** We will submit Your Personal Data to product providers / mortgage lenders / commercial lenders and/or Insurance product providers both in paper form and on-line via a secure portal.

The provision of this information to a third party is essential in allowing us to progress any enquiry made on your behalf and to deal with any additional questions or administrative issues that lenders and providers may raise.

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**Communicating with you** We will use Your Personal Data for the purpose of responding to any queries that you may have in relation to any investment/ mortgage product or insurance policy you may take out; or to inform you of any developments in relation to those products and/or policies of which we might become aware.

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## Sharing Your Personal Data

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### Where Your Personal Data may be Shared

From time to time Your Personal Data will be shared with:

- Investment providers, mortgage lenders and insurance providers
- Third parties whom we believe will be able to assist us with your enquiry; application or are able to support your needs as identified

These third parties will include but may not be limited to:

- Our Compliance Advisers
  - Product Specialists
  - Estate Agents
  - Providers of legal services, such as estate planners, conveyancers, surveyors and valuers (in each case where we believe this to be required due to your particular circumstances).
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### Why we share data

In each case, Your Personal Data will only be shared for the purposes set out in this client privacy notice. That is:

to progress your investment / mortgage and/or insurance enquiry and to provide you with our professional services.

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### Limitation

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 that 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.

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## Security and retention of Your Personal Data

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### **Our responsibilities**

Your privacy is important to us and we will keep Your Personal Data secure in accordance with our legal responsibilities.

We will take reasonable steps to safeguard Your Personal Data against it being accessed unlawfully or maliciously by a third party.

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### **Your responsibilities**

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 that email attachments are password protected or encrypted
  - only using secure methods of postage when original documentation is sent to us.
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### **Retention of data**

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

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## Your rights in relation to Your Personal Data

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### Your Rights

You can:

- Request copies of Your Personal Data that is under our control
  - Ask us to further explain how we use Your Personal Data
  - Ask us to send a copy of Your Personal Data to another organisation should you wish
  - Change the basis of any consent you may have already provided to enable us to market to you in the future – including withdrawing any consent in its entirety
  - Ask us to correct, delete, or require us to restrict or stop using Your Personal Data
    - Details as to the extent to which we can do this will be provided at the time of any such request
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### How to Contact us Regarding Your Personal Data

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

Data Protection Officer  
Nicola Whateley  
Whateley Wealth Management Ltd,  
3 Parsonage Drive  
Cofton Hackett  
Birmingham B45 8AS

Tel: 0121 285 8528

Email: [nicola@whateleywm.co.uk](mailto:nicola@whateleywm.co.uk)

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### Our Rights

If we feel we have a legal right not to deal with your request; or to action it in a different way from that which you have requested we will inform you at this time.

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### Your Responsibilities

You should also contact us as soon as possible if you become aware of any unauthorised disclosure of Your Personal Data, so that we may investigate and fulfil our own regulatory obligations.

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### Concerns or complaints

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, or in writing:

<https://ico.org.uk/global/contact-us/>

Information Commissioner's Office  
Wycliffe House, Water Lane,  
Wilmslow  
Cheshire, SK9 5AF

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## Our Cookie Policy

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### What is a “cookie”?

A “cookie” is a small text file that may be used, for example, to collect information about web activity.

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### Personal Information

Some cookies and other technologies may serve to recall Personal Information previously indicated by a web user.

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### Your Control

Most browsers allow you to control cookies, including whether or not to accept them – and how to remove them.

Some cookies are necessary for the operation of our website; if you choose to block them some of the aspects of the website may not work for you.

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### Examples of Cookie data collection

Tracking technologies may record information such as Internet domain and host names; Internet protocol (IP) addresses; browser software and operating system types; clickstream patterns; and dates and times that our site is accessed.

Our use of cookies and other tracking technologies allows us to improve our web site and your web experience.

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### Google Analytics

We use Google Analytics to understand the traffic that comes to our website. Google Analytics requires the use of cookies.

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