

Privacy Notice

Ashburn Wealth Management Ltd is committed to safeguarding your personal information and ensuring it is used fairly and responsibly.

This notice describes the privacy policy of Ashburn Wealth Management Ltd (AWM). The privacy policy applies to individual and corporate clients that obtain or apply for financial, health products, or consulting services or who receive service related to personal or business purposes or have done so in the past.

Our Privacy Principals:

- We do not sell client information.
- We do not provide client information to persons or entities outside of AWM who are doing business for their own marketing purposes.
- We afford prospective clients and former clients the same protections as existing clients with regards to the use of personal information.

Information That We Collect

As part of providing you with our services, we need to collect, use, share and store personal information about you, including your name, address, nationality, national insurance number, income, assets, liabilities, investment objectives, financial goals, bank details, tax returns, wills, trusts, mortgages, employment details and any other information provided on applications and questionnaires.

We will ask you to supply evidence of your identity and residence. We will request details of your source of funds and wealth and your knowledge and experience of financial instruments.

We may also require you to provide us with information about your health and medical history (known as 'sensitive information'). This will be required for certain services, such as life insurance products. We will always ask you for your consent before you provide us with sensitive information. If you do not give us your consent we will not be able to provide these services to you.

Generally, we collect information directly from you, but we may also obtain information from third parties, such as policy providers, your employer or other professional advisers such as accountants and solicitors. Information will only be obtained with your prior consent.

Where you provide us with personal information relating to others, such as your dependants or other family members, you confirm that you have their consent or are otherwise entitled to provide this information to us and for us to use it in the ways described in this Policy.

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

We use cookies on our website and all are set for the functionality of the site.

How we use the information

- To meet our legal and regulatory requirements.
- To verify your identity, identify your financial circumstances, evaluate your financial needs, and to provide a recommendation to best enable you to meet your financial objectives.
- To administer your investment portfolio and generally to provide services to you as a client for which you engage us.
- To maintain the accuracy and integrity of our administration system.
- To conduct statistical (such as client satisfaction surveys) and record keeping operations.

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 we will obtain your explicit consent to collect and process this information.

Who might we share your information with?

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.

Where it is necessary for your personal data to be forwarded to a third party we will use appropriate security measures to protect your personal data in transit. For instance, we may use password protection and/or encryption of data methods to transmit data to platform providers and other said third parties.

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?

During the course of our relationship with you we'll retain personal data which is necessary to provide services to you. We will take all reasonable steps to keep your personal data up to date throughout our relationship.

We are also subject to regulatory requirements to retain your data for specified minimum periods. These are, generally:

- Five years for investment business
- Indefinitely for pension transfers and opt-out business
- Three years for insurance business

These are **minimum** periods, during which we have a legal obligation to retain your records.

You have the right to request deletion of your personal data. We will comply with this request, subject to the restrictions of our regulatory obligations and any third party interests as described 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.

Cookies

The cookies used on our website are purely for the functionality of the site.

For further information visit <http://www.allaboutcookies.org/>

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 website features may not function as a result.

Other websites

Our website contains links to other websites. This privacy policy only applies to this website 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?

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 and we will place any updates on this web page. This privacy policy was last updated on 17 February 2020.

How to contact us

Please contact us if you have any questions about our privacy policy or information we hold about you: by email at info@ashburnwealth.co.uk

Or write to us at:

Ashburn Wealth Management Ltd
Ashburn House
84 Grange Road
DARLINGTON
DL1 5NP