



## Privacy Policy

### Definitions

“We”, “us” or “our” – Asperand Wealth Limited, a company incorporated in England and Wales (company number 09498223), whose registered office is at 40 Bloomsbury Way, Lower Ground Floor, London, WC1A 2SE.

“You” or “your” or “yours” – You, the client of Asperand Wealth Limited, including any joint account holder.

### Privacy

We take your privacy very seriously. We ask that you read this Privacy Policy carefully as it contains important information on why and how we collect and use personal data and provides information about your rights. It applies to personal data provided to us, both by you or by others. We may use personal data provided to us for any of the purposes described in this Privacy Policy or as otherwise stated at the point of collection.

### Personal Data

Personal data is any information relating to an identified or identifiable living person. We process personal data for numerous purposes, and the means of collection, lawful basis of processing, use, disclosure, and retention periods for each purpose may differ.

When you make an enquiry with us about booking an initial consultation, we'll ask you to provide some contact information:

- full name
- landline and/or mobile phone number
- email address

During our initial consultation and/or on further occasions in the course of prospecting or providing our service to you, we may collect the following personal data when you provide it to us:

- contact information
- employment status
- health information \*
- identity information
- details of any vulnerability
- lifestyle information \*
- financial information
- data about criminal convictions or offences
- details of your dependents, family members and/or beneficiaries \*\*



- \* Where we deem it may be suitable to consider recommending products such as insurance, we will need to collect and process information that is “sensitive”. This type of information includes details about your health and lifestyle. These are known as ‘special categories of data’ and are subject to additional levels of protection under data protection legislation.
- \*\* If you are providing information about another person, we expect you to ensure that they know you are doing so and are content with their information being provided to us. You might find it helpful to show them this privacy notice and if they have any concerns please contact us in one of the ways described further below.

### How and why do we use your personal information?

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.

This includes any information provided by you or others in various ways, including (but not limited to):

- in applications, emails, letters and other electronic messaging systems, during telephone and video calls and face-to-face conversations, when registering for our services, and in customer surveys.
- information we receive from or through other organisations (e.g. product providers, insurance companies, publicly available information online, and fraud prevention agencies) whether in the course of providing products and services to you or otherwise, and from information we gather from your use of and interaction with our website internet and the devices you use to access them.

The primary legal basis that we intend to use for the processing of your data is for the performance of our contract with you.

Where special category data is required, we will obtain your explicit consent in order to collect and process this information.

In principle, your personal data should not be held for longer than is required under the terms of our contract for services with you. However, we are subject to regulatory requirements to retain data for specified minimum periods. We also reserve the right to retain data for longer than this due to the possibility that it may be required to defend a future claim against us. In any case, we will not retain your personal data for longer than 6 years past the time of your death.



### Third parties

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 investment 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 instructions.

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.

On occasions, we may refer you to the services of another professional, e.g. solicitor, accountant, mortgage adviser. Only if you agree at the time, we may provide these professionals with your data to expedite your engagement with their services.

We won't share your information for marketing purposes with any other company.

### Data Security

We have appropriate security measures in place to prevent personal data from being accidentally lost or used or accessed in an unauthorised way. We limit access to your personal data to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

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.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

### Internet cookies

We may use cookies to track visitor use of our website and to compile statistical reports on website activity. 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.

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.



## Your Rights

Under Data Protection regulations individuals have a number of rights. These are as follows:

### Right to be informed

Individuals have the right to be informed about the collection and use of their personal data.

We do this in this Privacy Policy.

### Right of access

You can ask us to confirm whether or not we have and are using your personal data. You can also ask to get a copy of your personal data from us and for information on how we process it.

### Right to rectification

You can ask that we rectify any information about you which is incorrect. We will be happy to rectify such information but would need to verify the accuracy of the information first.

### Right to erasure (known as the “Right to be forgotten”)

You can ask that we erase your personal data if you have either withdrawn your consent to us using your information (if we originally asked for your consent to use your information), or exercised your right to object to further legitimate use of your information, or where we have used it unlawfully or where we are subject to a legal obligation to erase your personal data.

We may not always be able to comply with your request. As we are regulated by the FCA, we are required to retain records that demonstrate the advice we provide to our customers. These records contain personal information and data that enables us to formulate our advice. We will therefore not remove or delete any personal information or data until such time as our regulatory obligation has been fulfilled in respect of each transaction or piece of advice.



### Right to restrict processing

You can ask that we restrict our use of your personal data in certain circumstances. This means that you can limit the way that we use your data in the following circumstances:

- you contest the accuracy of your personal data and we are verifying its accuracy
- the data has been unlawfully processed and you oppose erasure, requesting restrictions instead
- we no longer need the personal data but you need us to keep it in order to establish, exercise or defend a legal claim
- you have objected to us processing your data and we are considering whether our legitimate grounds override your request

We can continue to use your personal data following a request for restriction where we have your consent to use it; or we need to use it to establish, exercise or defend legal claims, or we need to use it to protect the rights of another individual or a company.

### Right to data portability

You can ask us to provide your personal data to you in a structured, commonly used, machine-readable format, or you can ask to have it transferred directly to another data controller (e.g. another company).

The right to data portability only applies:

- to personal data **you** have provided to us
- where the processing is based on your consent or for the performance of a contract
- where processing is carried out by automated means

### Right to object

You can object to any use of your personal data which we have justified on the basis of our legitimate interest, if you believe your fundamental rights and freedoms to data protection outweigh our legitimate interest in using the information. If you raise an objection, we may continue to use the personal data if we can demonstrate that we have compelling legitimate interests to use the information.

You can exercise your right to object at the first point of contact with us or at any other time by contacting us a detailed below. If exercising your right to object affects or prevents us from being able to provide you with any of the services we offer, we will inform you.



### Right not to be subject to automated decision-making

You may have the right to contest a decision, express your point of view and ask for a human review **if** we make a decision about you based solely by automated means (i.e. with no human intervention).

However automated decision making does not form part of any of our processes.

### Exercising Your Rights

To exercise any of your rights detailed above you can contact us as detailed below.

In writing:

Phone:

Email:

Data Protection Officer,  
Asperand Wealth Limited  
40 Bloomsbury Way  
Lower Ground Floor  
London  
WC1A 2SE

0207 112 8407

dataprotectionofficer@asperandwealth.co.uk

We may ask you for proof of identity when making a request to exercise any of these rights. We do this to ensure we only disclose information or change your details where we know we are dealing with the right individual.

We will not ask for a fee, unless we think your request is unfounded, repetitive or excessive. Where a fee is necessary, we will inform you before proceeding with your request.

We aim to respond to all valid requests within one month. It may however take us longer if the request is particularly complicated or you have made several requests. We will always let you know if we think a response will take longer than one month. To speed up our response, we may ask you to provide more detail about what you want to receive or are concerned about.

We may not always be able to fully address your request, for example if it would impact the duty of confidentiality we owe to others, or if we are otherwise legally entitled to deal with the request in a different way.



## Complaints

We take the privacy of your personal information very seriously. If you ever feel you need to complain about how we've handled your personal information and data, you can contact our Data Protection Officer at the details provided above.

If you're still unhappy with any aspect of how we handle your personal information, you also have the right to contact the Information Commissioner's Office (ICO). The ICO is the UK's independent body set up to uphold information rights. Our reference number with the ICO is: ZA164554.

In writing:

Phone:

Online:

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

0303 123 1113

<https://ico.org.uk>

## Changes to this privacy notice

We reserve the right to alter this privacy notice at any time. Such alterations will be posted on our website. You can also obtain an up-to-date copy of our privacy notice by contacting our Data Protection Officer at the details provided above.

Should you object to any alteration, please contact our Data Protection Officer.