

Invest Southwest Ltd and Will Management Services Ltd are part of Invest Southwest IFA Holdings Ltd.

This privacy notice explains how we use any personal information we collect about you.

### **What information do we collect about you?**

We collect information about you when you engage us for financial planning, financial advice, mortgage advice, investment management services and Wills and Will related services. This information will relate to your personal and financial circumstances. It may also include special categories of personal data (such as sensitive data) if this is necessary for the provision of our services.

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

Information relating to the usage of our website is collected using cookies. These are text files placed on your computer to collect standard internet log information and visitor behaviour information. We'll use the information collected from the website to personalise your repeat visits to the site.

### **Information about connected individuals.**

We may need to gather personal information about your close family members and dependents in order to provide our service to you effectively. In such cases, it will be your responsibility to ensure that you have the consent of the people concerned to pass their information on to us. We'll provide a copy of this privacy notice for them or, where appropriate, ask you to pass the privacy information to them.

### **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 we collect about you is essential to be able to carry out our services 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 in order to collect and process this information.

### **How will we use the information about you?**

We collect information about you in order to provide you with the services for which you engage us.

### **Who might we share your information with?**

*If you agree*, we may email you about other products or services that we think may be of interest to you. This includes passing on your personal information to Invest Southwest or Will Management Services accordingly so that collectively, we may offer you a holistic service.

We will not share your information for marketing purposes with companies outside our group of companies.

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. Intelliflo, the company that provides our back office and client management software is one example.

Where it is necessary for your personal data to be forwarded to a third party securely (for example if we are processing sensitive data), we will use appropriate measures to protect your personal data in transit, based on the consequences of losing such data.

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?**

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, and also reserve the right to retain data indefinitely, due to the possibility that it may be required to investigate a complaint made against us.

You have the right to request deletion of your personal data and we will be happy to comply with this request, subject to the restrictions of our regulatory obligations and legitimate interests as noted 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.

### **Marketing**

We would like to send you information about our products and services, and those of other companies in our group which may be of interest to you (note, our products and services only, not those of any third party). If you have agreed to receive marketing information, you may opt-out at a later date. Please note, we do not regard customer satisfaction requests as marketing in this context.

You have a right at any time to stop us from contacting you for marketing purposes. If you no longer wish to be contacted for marketing purposes, please contact us using one of the contact methods stated below.

### **Cookies**

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

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

Cookies are text files placed on your device to collect standard internet information and visitor behaviour. We may use such information to personalise your repeat visits to the sites.

You can set your browser not to accept cookies and the above website tells you how to remove cookies from your browser. If you do, some of the features of our website may not function as a result.

### **Other websites**

Our websites contain links to other websites. This privacy policy only applies to our websites 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?**

In the first instance contact your Invest Southwest or Will Management Services adviser. You also have a right to lodge a complaint with the supervisory authority for data protection.

In the UK this is,

**The Information Commissioner's Office.**

0303 123 1113 (local rate)

Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

**Changes to our privacy policy**

We keep our privacy policy under regular review. To check if you have the most recent version, please contact your adviser.

**How to contact us**

Please contact your adviser if you have any questions about our privacy policy or the information, we hold about you.

Should your adviser not be available, you can as an alternative contact our Compliance Officer/Will Manager:

**Invest Southwest**

Matthew Duncan

01823 353970

matthew@investsouthwest.co.uk

12 Hammet Street, Taunton, TA1 1RZ

**Will Management Services**

Linda Fisher

01823 336265

linda@willmanagement.co.uk

12 Hammet Street, Taunton, TA1 1RZ



**Matthew Duncan**

Executive Director

<b>Associated Policies</b>	
GDPR Data Protection Policy	Complaints
Recording Communications	