



Privacy Notice

Date of last update: 16/11/2018
FCA number: 486548

Table of Contents

Purpose of our Privacy Notice	3
Who we are	3
Scope of our privacy notice	3
What information do we collect about you	3
Standard personal information	3
Special category information	3
Information about connected individuals	3
How we collect personal information	4
How will we use your information	4
Reason for processing your personal information.....	4
Legal bases for processing.....	5
Legitimate interests for processing your data.....	5
Who might we share your information with.....	6
How long will we keep your information for	6
What are your rights.....	7
Marketing.....	7
Cookies.....	8
Other websites.....	8
Data protection contacts	8
Changes to our privacy policy	8
How to contact us	8

Purpose of our Privacy Notice

We are committed to protecting your privacy when dealing with your personal information. This privacy notice provides details about the information we collect about you, how we use and protect it. It also provides information about your rights.

Who we are

This privacy policy applies to Menzies Wealth Management Ltd ("we", "our", "us", or "MWM").

Scope of our privacy notice

This privacy notice applies to any individual who interacts with us about our products and services ('you', 'your'), in any way (for example, by email, through our website, by phone, through our client portal). We will give you further privacy information if necessary for specific contact methods or in relation to specific products or services.

This privacy notice applies if you ask us about, buy or use our products and services. It describes how we handle your information, regardless of the way you contact us (for example, by email, through our website, by phone, through our client portal and so on). We will provide you with further information or notices if necessary, depending on the way we interact with each other.

If you have any questions about this, please contact us at advice@menzieswm.co.uk.

What information do we collect about you

The information we collect from and about you will depend on the reason we are collecting it and the nature of our relationship with you. It may include some or all of the following 'Standard' and 'Special Category' data.

Standard personal information includes:

- Information relating to your personal and financial circumstances (such as name, date of birth, contact details, income, expenditure, assets, liabilities, investments, pensions, protection, goals, objectives).
- Documentation confirming your identity, tax residency, legal authority and national identifiers (such as your National Insurance number or passport number)
- Information you provide about other people such as your close family members, dependants, joint applicants, beneficiaries.
- Information provided by your employer where they engage our employee benefit services, such as your age, salary, work location.
- Information connected to the products and services we arrange and/or manage for you such as bank details, attitude to risk, capacity for loss, and investment preferences.
- Your correspondence with us such as letters, emails, telephone calls and meetings.
- Images of you collected by photography or security cameras should you visit one of the Menzies offices or one of our events.
- Information collected via cookies when you visit our client portal or the Menzies website.
- Information when you voluntarily complete client surveys or provide feedback to us.

Special category information includes:

- Information relating to your physical and mental health where it is necessary to provide the product or service you have requested or if required to comply with our legal obligations.
- Information about your race, ethnic origin and religion where you have provided this information and it is necessary to provide the product or service you have requested or if required to comply with our legal obligations.
- Information about any criminal convictions and offences (we may get this information when carrying out anti-fraud or anti-money-laundering checks).

Information about connected individuals

We may need to gather personal information about close family members and dependants in order to provide our services 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 and you must make sure they have seen a copy of this privacy notice.

How we collect personal information

We collect personal information from you and from third parties (for example anyone acting on your behalf, investment managers, insurance providers, employer, and so on).

Where you provide us with information about other people, you must make sure that they have seen a copy of this privacy notice and are comfortable with you giving us their information.

We collect personal information from you through your contact with us, including:

- By phone (we may record or monitor phone calls to make sure we are keeping to legal rules, codes of practice and internal policies, and for quality assurance purposes).
- By email
- Through our website and client portal
- By post
- By filling in application or other forms
- Through social media
- Face-to-face (for example, in meetings or seminars)
- When you provide your business card

We also collect information from other people and organisations.

- Your parent or guardian, if you are under 18 years old.
- A family member, or someone else acting on your behalf.
- Any service providers who work with us in relation to your product or service, if we don't provide it to you direct, such as investment managers and insurance providers.
- Fraud-detection and credit-reference agencies.
- Your employer, if you are covered by an insurance policy your employer has taken out or when your employer contacts us or engages us for employee benefits services.
- Other third parties, such as regulators, data-protection supervisory authority, Financial Ombudsman service, HMRC.

How will we use your information

We will usually be a "data controller" in relation to the data we process. We will collect and use personal information about you in order to provide our services. In general terms, we collect and use personal information about you to:

- Deliver our services and meet our legal responsibilities.
- Verify your identity where this is required.
- Contact you by post, email, telephone or via our client portal about important changes to our services, your investments and any other products we may manage on your behalf.
- Maintain our records.
- Administer your investments, pension, protection policies and other financial services.
- Where you agree, contact you by post, email, telephone or via our client portal about other services we offer that may be of interest to you.
- Prevent and detect crime, fraud, or corruption.

Reason for processing your personal information

Where you, or in the case of employee benefits services your employer, have contracted for our services we may process personal information about you in order to facilitate the contractual relationship and to provide our services. The reason and legal basis we rely on for using your personal information will depend on the circumstances and is explained in more detail below:

Reasons for processing your personal data may include:

- Analysing your personal circumstances in order to make suitable recommendations for you.
- Analysing personal information provided by your employer in order to make suitable employee benefit recommendations that they may provide to you.
- Making decisions about appropriate products and services provided by third parties such as investment platforms and providers.
- Administering your investments, pensions, protection policies and any other services as agreed.

- Administering an employee group scheme that you may be a member of.
- Making contact with you.
- Administering our contract with you.
- Business management including accounting and auditing.
- Making improvements to our services.
- Fulfilling our legal and regulatory obligations.

If you do not wish for your personal information to be processed we will be unable to provide you with our services.

Legal bases for processing

We process your personal information for the purposes set out in this privacy notice. We have also set out some legal reasons why we may process your personal information (these depend on what category of personal information we are processing).

By law, we must have a lawful reason for processing your personal information. We process standard personal information about you if this is:

- Necessary to provide the services set out in a contract – if we have a contract with you, we will process your personal information in order to fulfil that contract (that is, to provide you and your dependants with our products and services).
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

Whilst we have number of legal bases for processing your data, the primary legal basis that we intend to use 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 be unable to fulfil our legal and regulatory obligations.

We may process special category information about you:

- Where it is necessary to provide the product or service you have requested.
- It is required to comply with our legal obligations.
- It is necessary to establish, make or defend a legal claim.
- We have your permission.

Legitimate interests for processing your data

We process your personal information for a number of legitimate interests, including managing all aspects of our relationship with you, for marketing, to help us improve our services and products, and in order to exercise our rights or handle complaints/claims.

Legitimate interest is one of the legal reasons why we may process your personal information. Taking into account your interests, rights and freedoms, legitimate interests which allow us to process your personal information include:

- To manage our relationship with you, our business and third parties who provide products or services for us (for example, to check that you have received a service that you've paid for).
- To keep our records up to date and to provide you with marketing as allowed by law;
- For statistical research and analysis so that we can monitor and improve our products, services, websites and client portal, or develop new ones.
- To contact you about market research we are carrying out.
- To enforce or apply our website terms of use, our policy terms and conditions or other contracts, or to protect our (or our customers' or other people's) rights, property or safety.
- To exercise our rights, to defend ourselves from claims and to keep to laws and regulations that apply to us and the third parties we work with; and
- To take part in, or be the subject of, any sale, purchase, merger or takeover of all or part of the MWM business.

Legitimate interests for monitoring your use of our IT and communications systems:

- To protect our networks and other unauthorised access or data leakage.
- To ensure our policies such as those concerning security, fair use and data security are adhered to.
- To ensure commercial sensitive information is kept confidential.

Who might we share your information with

To ensure that we are providing an efficient and effective service we will sometimes be required to share the information we have collected with third parties. These third parties may include:

- Platforms, providers, investment managers and other product or service providers.
- HM Revenue & Customs, regulators such as the Financial Conduct Authority, Financial Ombudsman Service, and other authorities.
- Credit reference agencies to carry out anti-money laundering, anti-fraud or identity verification checks.
- Companies we have chosen to support us in the delivery of our services such as IT service providers, legal, accountancy, compliance and marketing and events services.
- Companies you ask us to share data with.

We may also share your data with other companies in the Menzies Group, for example as part of our regular accounting, hosting of data, and system maintenance.

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.

If we share your personal information, we will make sure appropriate protection is in place to protect your personal information in line with data-protection laws.

Where your personal data to be forwarded to a third party we will use appropriate security measures to protect your personal data in transit. This may include:

- Password protection
- Use of provider encrypted mail software
- Online provider portals

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 will we keep your information for

We will only retain your personal information for as long as is necessary in order to discharge our statutory and legal obligations. This will vary depending on the particular circumstances and information we have collected. We have an internally published 'Record Retention Policy' and retain personal information in line with this using the following criteria.

- How long you have been a client with us, the types of products or services you have with us, and when you will stop being our client.
- How long it is reasonable to keep records to show we have met the obligations we have to you and by law.
- Any periods for keeping information which are set by law or recommended by regulators, professional bodies or associations.
- Any relevant proceedings that apply.

A copy of our Record Retention Policy can be provided on request. We reserve the right to retain data for longer where we believe it is in our legitimate interest to do so.

What are your rights

You have the right to access your information and to ask us to correct any mistakes and delete and restrict the use of your information. You also have the right to object to us using your information, to ask us to transfer information you have provided, and to withdraw permission you have given us to use your information and to ask us not to use automated decision-making which will affect you. For more information, see below.

You have the following rights (certain exceptions apply).

- Right of access: the right to make a written request for details of your personal information and a copy of that personal information
- Right to rectification: the right to have inaccurate information about you corrected or removed
- Right to erasure ('right to be forgotten'): the right to have certain personal information about you erased
- Right to restriction of processing: the right to request that your personal information is only used for restricted purposes
- Right to object: the right to object to processing of your personal information in cases where our processing is based on the performance of a task carried out in the public interest or we have let you know the processing is necessary for our or a third party's legitimate interests. You can object to our use of your information for profiling purposes where it is in relation to direct marketing
- Right to data portability: the right to ask for the personal information you have made available to us to be transferred to you or a third party in machine-readable formats
- Right to withdraw consent: the right to withdraw any consent you have previously given us to handle your personal information. If you withdraw your consent, this will not affect the lawfulness of MWM's use of your personal information prior to the withdrawal of your consent and we will let you know if we will no longer be able to provide you your chosen product or service
- Right in relation to automated decisions: you have the right not to be subject to a decision based solely on automated processing which produces legal effects concerning you or similarly significantly affects you, unless it is necessary for entering into a contract with you, it is authorised by law or you have given your explicit consent. We will let you know when such decisions are made, the lawful grounds we rely on and the rights you have.

Please note: other than your right to object to the use of your data for direct marketing (and profiling to the extent used for the purposes of direct marketing), your rights are not absolute: they do not always apply in all cases and we will let you know in our correspondence with you how we will be able to comply with your request.

If you make a request, we will ask you to confirm your identity if we need to, and to provide information that helps us to understand your request better. If we do not meet your request, we will explain why.

In order to exercise your rights please contact advice@menzieswm.co.uk.

Marketing

We may use your personal information to send you marketing by post, by phone, through social media, by email and via our client portal. We can only use your personal information to send you marketing material if we have your permission or a legitimate interest as described above.

If you don't want to receive emails from us, you can click on the 'unsubscribe' link that appears in all emails we send. Otherwise, you can contact us at advice@menzieswm.co.uk to update your contact preferences.

You have the right to object to direct marketing and profiling (the automated processing of your information to help us evaluate certain things about you, for example, your personal preferences and your interests) relating to direct marketing. Please see the section about your rights for more details.

Cookies

A cookie, also known as a browser cookie, is a text file containing small amounts of information which a server may download to your computer hard drive, tablet or mobile device when you visit a website or use an app. We use cookies to track visitor use of our website and to compile statistical reports on website activity. For further information visit 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 our website so when you link to other websites you should read their own privacy policies.

Data protection contacts

If you have any questions, comments, complaints or suggestions in relation to this notice, or any other concerns about the way in which we process information about you, please contact our Compliance Officer at advice@menzieswm.co.uk.

You also have a right to make 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
T: 0303 123 1113 (local rate)

Changes to our privacy policy

We keep our privacy policy under regular review. This version was last updated on 16th November 2018 and historic versions can be obtained by contacting us.

Any updates to our privacy policy will be placed on our website: www.menzies.co.uk/helping-you/menzies-wealth-management

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: advice@menzieswm.co.uk
Or write to us at: The Compliance Officer
Menzies Wealth Management
Lynton House, 7-12 Tavistock Square
London, WC1H 9LT