

## PRIVATE CLIENT PRIVACY NOTICE

Richmond House Wealth Management Limited, Richmond House Investment Management Limited and Richmond House Corporate Services Limited are sister companies under common ownership. We are classed as Data Controllers for the personal information we obtain in order to provide our services to you. 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 and investment management services. This information will relate to your personal and financial circumstances. It may also include special categories of personal data such as data about your health, if this is necessary for the provision of our services.

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

Information relating to 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 will use your 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 dependants 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 will 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 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 will be unable to fulfil our legal and regulatory obligations.

Where special category data is required we'll 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?**

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 example, secure e mail, password encryption or the use of secure data rooms.

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.

**If you agree**, we may email you about other products or services that we think may be of interest to you.

**If you agree**, we will pass on your personal information to our group of companies so that they may offer you their products and services.

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

### **How long do we keep hold of your information?**

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

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

- Five years for investment business
- Three years for insurance business

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

We reserve the right to retain data for longer where we believe it's in our legitimate interests to do so. We will not normally keep your company and employee personal data for longer than 75 years after our relationship with you has ended.

You have the right to request deletion of your company and employee personal data. We will 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'd 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 this 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. If you have agreed to receive marketing information, you may opt out at a later date.

You have a right at any time to stop us from contacting you for marketing purposes or giving your information to other members of the group. If you no longer wish to be contacted for marketing purposes, [info@richmondhousewm.co.uk](mailto:info@richmondhousewm.co.uk)

## **Cookies**

We use cookies to track visitor use of the 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.

## **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 our website. We will provide clients with updated copies of our privacy policy at the next review. This privacy policy was last updated on 25/05/2018.

## **How to contact us**

If you have any questions about our privacy policy or information we hold about you please email us at [info@richmondhousewm.co.uk](mailto:info@richmondhousewm.co.uk)

Or write to us at

Premier House  
Argyle Way  
Stevenage  
Herts, SG1 2AD