

## Privacy Notice

This privacy notice explains how Isio Wealth Planning Ltd ('we/our') process any personal information we collect about you. Please read the following carefully to understand our views and practises regarding your personal data and how we will treat it.

In this privacy notice "Data Protection Legislation" means the EU General Data Protection Regulation 2016/679; together with all other applicable legislation relating to privacy or data protection and where we use the terms "personal data", "data subject", "controller", "processor" and "process" (and its derivatives), such terms shall have the meanings given to them in the Data Protection Legislation.

We collect information about you when you engage with us for financial planning and financial advice. We may collect information in relation to other people e.g. joint applicants or beneficiaries for products you may take out with us where you provide us with such information.

By providing us with such information you confirm that you have obtained any necessary permissions from such persons to the reasonable use of their information for such purposes in accordance with this notice or are otherwise permitted to give us this information on their behalf. Please also ensure that those other people are aware of this notice and that the provisions of this notice are clearly communicated to them.

### What information do we collect about you and how do we do this?

Personal and financial information which will include:

- name, address, date of birth, telephone number and email address;
- national Insurance number;
- employment history;
- salary, details of any period of absence and working hours;
- marital status and details of any dependants and/or potential beneficiaries;
- bank details and other financial information related to your other investments;
- information relating to health if this has been shared with us; and
- any other personal data which may be needed to carry out the services or connected to your product.

The information we collect may also include special categories of personal data such as data about your health, marital or civil partnership status if this is necessary for the provision of our services or to comply with our legal obligations.

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## How do we collect information about you?

- The information we collect will be via different methods when we communicate with you including for example, a fact find, meeting notes, telephone calls with you, letters, e-mails and product application forms that you fill in.
- 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'll use your information collected from the website to personalise your repeat visits to the site. This is explained further in our privacy notice when accessing our website.

## Lawful grounds for using your information

We are permitted to process personal information, in compliance with Data Protection Legislation, by relying on one or more of the following lawful grounds:

- you have explicitly agreed to us processing such information for a specific reason;
- the processing is necessary to perform the agreement we have with you or to take steps to enter into an agreement 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'd also be unable to fulfil our legal and regulatory obligations;
- the processing is necessary for compliance with a legal obligation we have; or
- the processing is necessary for the purposes of a legitimate interest pursued by us, which might be:
  - o to provide our services;
  - o to prevent fraud;
  - o to protect our business interests;
  - o to ensure that complaints are investigated;
  - o to evaluate, develop or improve our services; or
  - o to keep you informed about relevant products and services, unless you have indicated at any time that you do not wish us to do so.

In relation to any special categories of data, we will seek permission from you in the form of our consent form to process your special categories of personal data. However, it may be necessary for us to use certain information in order to comply with our legal obligations as a regulated entity.

Where you have consented to our processing of such information (including sensitive categories of personal data) you may withdraw such consent at any time. Please note, however, that in certain circumstances it may be still lawful for us to continue processing this information even where consent has been withdrawn, if one of the other legal bases described above is applicable. Please note that not providing or withdrawing consent could mean that we have insufficient information to provide our services.

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## How will we use the information about you?

We collect information about you primarily in order to provide you with the services for which you engage us; however, we may also use your information to:

- enable us to carry out statistical and other analysis and to meet our legal or regulatory obligations;
- for our reasonable commercial purposes (including in connection with our insurance, quality control and administration and assisting us to develop new and improved services);
- to confirm your identity and carry out background checks, including as part of our checks in relation to anti-money laundering, compliance screening and to prevent fraud and other crimes;
- to send you updates to our terms and conditions;
- to follow up with you after you request information to see if we can provide any further assistance;
- to check your instructions to us;
- to monitor, record and analyse any communications between you and us, including phone calls to analyse, assess and improve our services to you, as well as for training and quality purposes;
- to share information with relevant third parties in the context of a sale or potential sale of a relevant part of our business, subject always to confidentiality obligations;
- to improve the relevance of marketing messages we may send you or them (which you can opt out of as explained below).

## 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,
- our regulators for example the Financial Conduct Authority and the Information Commissioners Office for the UK (the ICO);
- product and platform providers that we use to arrange financial products for you; and
- third party agencies for identity verification purposes to fulfil our obligations in respect of prevention of money-laundering and other financial crime.

Where third parties are involved in processing your data, we'll 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'll only act in accordance with our written instructions. Where it's necessary for your personal data to be forwarded to a third party we'll use appropriate security measures to protect your personal data in transit. This includes using the Isio Wealth Planning Secure Message Retrieval Centre where the recipient is requested to open up a secure account. Sensitive data is also password protected when sent in an xlsx format.

## Sharing your personal data outside of the EEA

Information about you in our possession may be transferred to other countries (which may include countries outside the European Economic Area) for any of the purposes described in this notice, including our transmission of such information to agents outside the European Economic Area. You and they understand and accept that these countries may have differing (and potentially less stringent) laws relating to the degree of confidentiality afforded to the information it holds and that such information can become subject to the laws and disclosure requirements of such countries, including disclosure to governmental bodies, regulatory agencies and private persons, as a result of applicable governmental or regulatory inquiry, court order or other similar process. In addition, a number of countries have agreements with other countries providing for exchange of information for law enforcement, tax and other purposes.

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When we, or our permitted third parties, transfer information outside the European Economic Area, we or they will impose contractual obligations on the recipients of that data to protect such information to the standard required in the European Economic Area. We or they may require the recipient to subscribe to international frameworks intended to enable secure data sharing. In the case of transfers by us, we may also transfer your information where:

- the transfer is to a country deemed to provide adequate protection of your information by the European Commission;
- you and other relevant individuals have consented to the transfer; or
- such transfer is otherwise permitted under Data Protection Legislation (for example where we are required to provide such information by law).

## General Rights

You have a number of rights concerning the way that we use your information. You are responsible for ensuring that other relevant individuals are aware of these rights. At any time, you and such other individuals shall have the right:

to be informed about the processing of your personal data (i.e. for what purposes, what types, to what recipients it is disclosed, storage periods, any third party sources from which it was obtained, confirmation of whether we undertake automated decision-making, including profiling, and the logic, significance and envisaged consequences);

- to request access to, or a copy of, any personal data we hold about you;
- to request the rectification of your personal data, if you consider that it is inaccurate;
- to request the erasure of your personal data, if you consider that we do not have the right to hold it;
- to object to your personal data being processed for a particular purpose or to request that we stop using your information;
- to request not to be subject to a decision based on automated processing and to have safeguards put in place if they are being profiled based on your personal data;
- to ask us to transfer a copy of your personal data to themselves or to another service provider or third party where technically feasible and otherwise required by applicable regulations;
- to withdraw, at any time, any consent that you have previously given to us for our use of your personal data, although if you withdraw your consent this may impact on our ability to provide services; or
- to ask us to stop or start sending marketing messages at any time.

As stated above, you and other relevant individuals may have a right of access to some, or all, of the information we hold about you or them, or to have any inaccurate information corrected, under the Data Protection Legislation. Any request for access to or a copy of your personal data must be in writing and we will endeavour to respond within a reasonable period and in any event within one month in compliance with Data Protection Legislation. We will comply with our legal obligations as regards any individual's rights as a data subject.

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We aim to ensure that the information we hold about you or other relevant individuals is accurate at all times. To assist us in ensuring that such information is up to date, please let us know if the personal details of you or other relevant individuals change. We will correct any incorrect or incomplete information and will stop processing personal data, or erase it, where there is no lawful ground for us to continue to hold or use that information.

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

We will only keep the information we collect about you for as long as required for the purposes set out above or as required to comply with any legal obligations to which we are subject. This will involve us regularly reviewing our files to check that information is accurate and up-to-date and still required.

### Marketing

We'd like to send you information about our products and services which may be of interest to you for example, your next year's ISA subscription, utilising your pension annual allowance and other investments which may suit your needs. If you've 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. If you no longer wish to be contacted for marketing purposes, please contact us by email or post.

We won't share your information for marketing purposes with companies outside our group of companies or other companies.

### Cookies

We use cookies to track visitor use of our website [www.isio.com](http://www.isio.com) and to compile statistical reports on website activity. Our website privacy notice can be viewed when you access the website.

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. Further details are contained within our privacy notice on the website.

### 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 notice

We keep our privacy notice under regular review and we'll place any updates on our web page at <https://www.isio.com/privacy-policy/> and advise you to check this from time to time to view the latest updates. You can always request a hard copy of this at any time. This privacy notice was last updated on 23rd May 2018.

### How to contact us

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Please contact us if you have any questions about our privacy notice or the information we collect or hold about you;

**In writing:** To the Data Protection Officer at Isio Wealth Planning Ltd at Isio, 3 Noble Street, Noble Street, London, EC2V 7EE

**By e-mail:** [dataprivacy@isio.com](mailto:dataprivacy@isio.com)

We are committed to protecting your personal data.

[Only use the below disclaimer for marketing material and white papers otherwise delete]

The information contained herein is of a general nature and is not intended to address the circumstances of any particular individual or entity. Although we endeavour to provide accurate and timely information, there can be no guarantee that such information is accurate as of the date it is received or that it will continue to be accurate in the future. No one should act on such information without appropriate professional advice after a thorough examination of the particular situation.