

# Our Privacy Statement

# Privacy Notice

**Wingate Wealth Management Limited** trading as **Wingate Financial Planning** is part of the **Wingate Group** which includes **WFS Consulting Limited** trading as **Wingate Benefit Solutions**. 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 and investment advice.

The information we collect will relate to your personal and financial circumstances and may also include special categories of personal data such as information 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 about connected individuals

We may need to gather personal information about your close family members and dependents in order to carry out the services you have engaged us to deliver. In such cases, it will be your responsibility to ensure that you have the consent of the people concerned to pass on their information to us. We will provide them with a copy of this privacy notice, if requested.

## 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 data we would also 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 you engage us to deliver.

## 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'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 personal data to be forwarded to a third party we'll use appropriate security measures to protect your personal data in transit. This will include the use of passwords and/or the encryption of data where this is possible.

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?

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

We're subject to regulatory requirements to retain your data for specified minimum periods which are generally;

- Five years for investment business
- Three years for insurance business
- Indefinitely for pension transfer and pension opt out's

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 its in our legitimate interests to do so. In any case, we'll not keep your personal data past the time of your death.



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We collect personal information from the start of our engagement with you and before you have instructed us to deliver chargeable services; during this period, you will be treated as a prospect. If you do not become a client, we will retain the personal information collected for a maximum period of 18 months unless you have expressed a clear interest in becoming a client at a later date.

You have the right to request deletion of your personal data. We'll 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 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 the other companies in our group, which we feel may be of interest to you. This type of contact will only be made with your explicit consent.

If you have provided your consent for us to contact you for marketing purposes, you have the right, at any time, to withdraw this consent and stop us from contacting you in this way.

If you have given your consent and no longer wish to be contacted for marketing purposes, please confirm this in writing using the contact details provided below.

### **We will not share your information for marketing purposes with any companies outside of the Wingate Group**

#### **Cookies**

Our website uses Google Analytics, a web analytics service provided by Google, Inc. ('Google'). Google Analytics uses cookies (text files placed on your computer) to help the website operators analyse how users use the site. The information generated by the cookie about your use of the website (including your IP address) will be transmitted to and stored by Google on servers in the United States. Google will use this information for the purpose of evaluating your use of our website and enable us to compile reports on our website activity. Google may share the information with other website operators or use this to provide other services relating to website activity and internet usage. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. Google will not associate your IP address with any other data held by Google. By using our website, you consent to the processing of data about you by Google in the manner and for the purposes set out above.

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.

### **What can you do if you are unhappy with how your personal data is processed?**

You have the right to lodge a complaint with the supervisory authority for data protection, which in the UK is the Information Commissioner's Office (ICO). The contact details for the ICO are;

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

Tel: 0303 123 1113 (local rate)  
Website: [ico.org.uk](http://ico.org.uk)

### **How to contact us**

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

Wingate Financial Planning  
Quadrant House  
61/65 Croydon Road  
Caterham  
Surrey  
CR3 6PB

Tel: 01883 332261  
Email: [enquiries@wingatefp.com](mailto:enquiries@wingatefp.com)  
Data Protection Officer: Ben Clarke





**INVESTORS IN PEOPLE®**  
We invest in people Platinum



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