Customer Privacy Notice

Who we are

Puleston Wealth Management Ltd is the data controller responsible for Your Personal Data. We are a limited company registered in England and Wales under company number 08389899, with our registered office at Springside, 21 Arley Road, Appleton Thorn, Warrington, Cheshire WA4 4RN.

We are authorised and regulated by the Financial Conduct Authority under firm reference number 1032154. You can check our details on the Financial Services Register at register.fca.org.uk.

We are registered with the Information Commissioner's Office under registration number Z3574500. Simon Puleston, Director, is the person responsible within our firm for data protection matters.

Why should you read this document?

During the course of dealing with us, we will ask you to provide us with detailed personal information relating to your existing circumstances, your financial situation and, in some cases, your health and family health history (Your Personal Data). This document is important as it allows us to explain to you what we will need to do with Your Personal Data, and the various rights you have in relation to Your Personal Data.

What do we mean by "Your Personal Data"?

Your Personal Data means any information that describes or relates to your personal circumstances. Your Personal Data may identify you directly, for example your name, address, date of birth, national insurance number. Your Personal Data may also identify you indirectly, for example, your employment situation, your physical and mental health history, or any other information that could be associated with your cultural or social identity.

In the context of providing you with assistance in relation to your investment, pension, mortgage and insurance requirements, Your Personal Data may include:

- Title, name, date of birth, gender, nationality, civil or marital status, contact details, addresses and documents that are necessary to verify your identity
- Employment and remuneration information, including salary, bonus schemes, overtime, sick pay and other benefits, and employment history
- Bank account details, tax information, loans and credit commitments, personal credit history, sources of income and expenditure, family circumstances and details of dependants

- Health status and history, details of treatment and prognosis, medical reports, further details of which are provided below specifically with regard to the processing we may undertake in relation to this type of information
- Any pre-existing investment, pension, mortgage or insurance products and the terms and conditions relating to these

The basis upon which our firm will deal with Your Personal Data

When we speak with you about your investment, pension, mortgage and insurance requirements we do so on the basis that both parties are entering a contract for the supply of services.

In order to perform that contract, and to arrange the products you require, we have the right to use Your Personal Data for the purposes detailed below.

Alternatively, either in the course of initial discussions with you or when the contract between us has come to an end for whatever reason, we have the right to use Your Personal Data provided it is in our legitimate business interest to do so and your rights are not affected. For example, we may need to respond to requests from product providers, mortgage lenders, insurance providers, our professional indemnity insurers and our compliance support provider relating to the advice we have given to you, or to make contact with you to seek feedback on the service you received.

On occasion, we will use Your Personal Data for contractual responsibilities we may owe our regulator, the Financial Conduct Authority, or for wider compliance with any legal or regulatory obligation to which we might be subject. In such circumstances, we would be processing Your Personal Data in order to meet a legal, compliance or other regulatory obligation to which we are subject.

The basis upon which we will process certain parts of Your Personal Data

Where you ask us to advise on or arrange products such as life insurance, critical illness cover, income protection, or certain pension and annuity arrangements, we will need to ask you about your health and your medical history (Your Special Data). We only collect health information that is relevant to the advice you have asked us to provide.

We will record and use Your Special Data in order to make enquiries of product and insurance providers in relation to products that may meet your needs, and to provide you with advice or guidance regarding the suitability of any product that may be available to you.

We process Your Special Data on the basis of your explicit consent. Where we are advising on or arranging insurance or pension products, we may also rely on the condition for insurance and pension purposes set out in paragraph 20 of Schedule 1 to the Data Protection Act 2018. You may withdraw your consent at any time, although if you do so we may be unable to continue to advise you or to progress an application on your behalf.

If you have parental responsibility for children under the age of 13, it is also very likely that we will record information on our systems that relates to those children and potentially to their Special Data.

The arrangement of certain types of insurance may involve disclosure by you to us of information relating to historic or current criminal convictions or offences (together "Criminal Disclosures"). This is relevant to insurance related activities such as underwriting, claims and fraud management. Where we process Criminal Disclosures we do so in reliance on the same insurance and pension condition referred to above.

We will use Your Special Data and any Criminal Disclosures in the same way as Your Personal Data generally, as set out in this Privacy Notice.

Information of this kind must be capable of being exchanged freely between intermediaries such as our firm, and insurance providers, to enable customers to secure the important protection that their needs require.

How do we collect Your Personal Data?

We will collect and record Your Personal Data from a variety of sources, but mainly directly from you. You will usually provide information during the course of our initial meetings or conversations with you to establish your circumstances, needs and preferences in relation to investments, pensions, mortgages and insurance. You will provide information to us verbally and in writing, including by email.

We may also obtain some information from third parties, for example credit checks, information from your employer and searches of information in the public domain such as the electoral roll. If we use technology solutions to assist in the collection of Your Personal Data, for example software that is able to verify your credit status, we will only do so if we have consent from you for us, or our nominated processor, to access your information in this manner. With regard to electronic identity checks we would not require your consent but will inform you of how such software operates and the purpose for which it is used.

What happens to Your Personal Data when it is disclosed to us?

In the course of handling Your Personal Data, we will:

- Record and store Your Personal Data in our paper files, mobile devices and on our computer systems, including our client management system, email, hard drives and cloud facilities. This information can only be accessed by employees, advisers and consultants within our firm and only when it is necessary to provide our service to you and to perform any administration tasks associated with or incidental to that service.

- Submit Your Personal Data to product providers, mortgage lenders and insurance providers, both in paper form and online via a secure portal. The provision of this information to a third party is essential in allowing us to progress any enquiry or application made on your behalf and to deal with any additional questions or administrative issues that lenders and providers may raise. Where you are making an application for credit, the lender may refer to a credit reference agency who will process your data, and this may impact upon your credit rating.
- Use Your Personal Data for the purposes of responding to any queries you may have in relation to any investment, pension, mortgage or insurance product you may take out, or to inform you of any developments in relation to those products and policies of which we might become aware.

Artificial intelligence

Artificial intelligence (AI) is the development of computer systems that can perform tasks typically requiring human intelligence, often by processing large amounts of data to achieve goals.

To enhance the quality, efficiency and accuracy of our services, we use AI tools to assist with:

- Recording and transcribing meetings, although you can opt out of being recorded
- Generating meeting notes and summaries
- Drafting correspondence and documentation
- Conducting checks for compliance with our internal procedures

All output produced with the assistance of AI is reviewed and approved by a qualified adviser before it is used or sent to you. AI is not used to make advice decisions about you. We are committed to protecting your privacy and ensuring that any information processed is handled securely. If you have any questions or concerns about the AI we use in relation to your personal information, please contact us directly.

Sharing Your Personal Data

From time to time Your Personal Data will be shared with:

- Investment providers, pension providers, mortgage lenders and insurance providers
- Third parties who we believe will be able to assist us with your enquiry or application, or who are able to support your needs as identified. These third parties will include, but may not be limited to, our compliance support provider, our professional indemnity insurers, product specialists, estate agents, and providers of legal and professional services such as estate planners, accountants, conveyancers, surveyors and valuers, in each case where we believe this to be required due to your particular circumstances.

In each case, Your Personal Data will only be shared for the purposes set out in this Customer Privacy Notice, that is, to progress your investment, pension, mortgage or insurance enquiry and to provide you with our professional services.

Please note that this sharing of Your Personal Data does not entitle such third parties to send you marketing or promotional messages. It is shared to ensure we can adequately fulfil our responsibilities to you, and as otherwise set out in this Customer Privacy Notice.

Transfers of Your Personal Data outside the United Kingdom

In the ordinary course of providing our service, Your Personal Data is held and processed within the United Kingdom.

Some of the technology we use, including certain cloud based systems and the artificial intelligence tools described above, may involve Your Personal Data being processed outside the United Kingdom. Where that happens, we will only use providers that offer an appropriate level of protection, and any transfer will be made either on the basis of UK adequacy regulations, or under an International Data Transfer Agreement, or under the UK Addendum to the European Commission's standard contractual clauses.

If you would like more information about the safeguards that apply to a particular transfer, please contact us using the details set out in this notice.

Security and retention of Your Personal Data

Your privacy is important to us and we will keep Your Personal Data secure in accordance with our legal responsibilities. We will take reasonable steps to safeguard Your Personal Data against it being accessed unlawfully or maliciously by a third party.

We also expect you to take reasonable steps to safeguard your own privacy when transferring information to us, such as not sending confidential information over unprotected email, ensuring email attachments are password protected or encrypted, and only using secure methods of postage when original documentation is being sent to us.

Your Personal Data will be retained by us either electronically or in paper form for a minimum period of six years following the advice or service you receive from us, although your data could be held for a longer period where this may be needed to meet the requirements of our regulatory bodies. Records relating to pension transfers, pension opt outs and other long term advice may be retained indefinitely.

Your rights in relation to Your Personal Data

You can:

- request copies of Your Personal Data that is under our control

- ask us to further explain how we use Your Personal Data
- ask us to correct, delete or require us to restrict or stop using Your Personal Data, with details as to the extent to which we can do this being provided at the time of any such request
- ask us to send an electronic copy of Your Personal Data to another organisation should you wish
- change the basis of any consent you may have provided to enable us to market to you in the future, including withdrawing any consent in its entirety

Collection of data from a third party to support you

Where identifiable data is collected from a third party such as a family member or a trusted friend, this information will only be used for the purpose of supporting the contract for the supply of services as outlined in this notice, and not for any other reason.

How to make contact with our firm in relation to the use of Your Personal Data

If you have any questions or comments about this document, or wish to make contact in order to exercise any of your rights set out within it, please contact:

Simon Puleston, Director

Puleston Wealth Management Ltd

Springside, 21 Arley Road, Appleton Thorn, Warrington, Cheshire WA4 4RN

Telephone: 01925 341 947

Email: info@pulestonwm.co.uk

Website: pulestonwm.co.uk

If we feel we have a legal right not to deal with your request, or to action it in a different way to how you have requested, we will inform you of this at the time.

You should also make contact with us as soon as possible on you becoming aware of any unauthorised disclosure of Your Personal Data, so that we may investigate and fulfil our own regulatory obligations.

If you have a complaint about how we have handled Your Personal Data, you should contact us using the contact details above. We will carry out an investigation and respond to you with the outcome.

If you remain dissatisfied after receiving our response, you may lodge a complaint with the UK's data protection regulator, the Information Commissioner's Office, who can be contacted through their website at https://ico.org.uk/global/contact-us/ or by writing to the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF.

Consent to Process Health Information

The advice and services we provide are supplied under a contract between us, and we do not need your consent to process Your Personal Data for that purpose. We do, however, need your explicit consent to process information about your health.

I consent to Puleston Wealth Management Ltd collecting and processing information about my health and medical history for the purposes set out in the Customer Privacy Notice above. I understand that I may withdraw this consent at any time, and that if I do so Puleston Wealth Management Ltd may be unable to continue to advise me or to progress an application on my behalf.

Signed: ____

Print name: ____

Date: ____

Marketing Consent

I hereby grant Puleston Wealth Management Ltd permission to process my personal data for the purpose of marketing. By providing your consent, you agree that you have given your express permission for us to market to you regarding products and services that we think may be of interest to you, and by any means of communication that is suitable at the time.

You may withdraw this consent at any time by contacting us using the details set out in this notice.

Signed: ____

Print name: ____

Date: ____