

INITIATE WEALTH MANAGEMENT LTD PRIVACY AND COOKIES POLICY

As the operators of the website (“**Website**”), Initiate Wealth Management Ltd (“**We**”, “**Us**”) is committed to protecting and respecting your privacy. This Privacy and Cookies Policy (“**Policy**”) (together with and any other documents referred to therein) sets out the basis on which the personal data collected from you, or that you provide to Us will be processed by Us. Please read the following carefully to understand our views and practices regarding your personal data and how We will treat it.

For the purpose of the General Data Protection Regulation (“**GDPR**”, from the GDPR implementation date) or, until GDPR implementation date, the Data Protection Act 1998, (collectively the “**Data Protection Laws**”) the Data Controller is Initiate Wealth Management Ltd.

YOUR PERSONAL INFORMATION

Information we collect from you

We collect and process some or all of the following types of information from you in the course of providing our services and other information to you and your use of our website (www.initiatewm.co.uk] “**Website**”).

- Information that you provide to us by any means, when you request information from us, or provide information to us with the intention of enabling us to provide you with advice and/or ongoing servicing.
- The types of information that you are required to provide to us will vary depending on the products that they are advising you about, but will usually include:
 - your name
 - postal address;
 - email address;
 - telephone number;
 - date of birth;
 - gender;
 - bank details;
 - tax identifiers;
 - other information as required by your chosen product providers or as required by our regulators; and
 - information about your financial affairs, tax affairs, assets and liabilities;

and may also include special category personal data relating to:

- your health
- If you contact Us, we may keep a record of that correspondence.
- We may also ask you to complete surveys that We use for research purposes, although you do not have to respond to them.
- Details of your visits to the Website including, but not limited to, traffic data, location data, weblogs and other communication data, and the resources that you access.

The provision of your name, address and date of birth, as well as certain other personal data that We will notify you of from time to time, is required from you to enable Us to advise you and to fulfil our regulatory and legal obligations. We will inform you at the point of collecting information from you, whether you are required to provide the information to Us.

USES MADE OF YOUR INFORMATION

Purposes of, and lawful basis for, processing

We use information held about you for the following purposes:

- To provide you with our services and to carry out our obligations arising from any contracts entered into between you and Us, including:
 - To send you service, support and administrative messages, reminders, technical notices, updates, security alerts, and information requested by you.
 - To operate, protect and improve Our services, Our business, and Our clients' experience.
 - To respond to any enquiries you submit to Us.
 - As part of Our efforts to keep Our services safe and secure.

Where we have a contract with you to provide our services, and where the processing of your data is necessary to perform such contract, we rely on “performance of a contract with the data subject” as the legal basis for the processing. In all other circumstances we rely on “legitimate interest” and our legitimate interests are improvement of our services and/or prevention or detection of fraud.

- Where you provide us with special category data, this will be used solely with your consent to research and advise on one or more products to suit your needs and to assist you with applications for and management of such products, and to provide such special category data to Best Practice and third party providers so that they can carry out the services that they provide to Us.
- To comply with our legal obligations as an authorised representative of an FCA regulated entity, including preparing and sending reports and submissions to Best Practice and/or regulatory authorities such as the FCA. “Compliance with a legal obligation” is the lawful basis on which we rely when we are carrying out regulated activities.
- To ensure that content on the Website is presented in the most effective manner for you and for the device(s) you use to access and view the Website. In these circumstances we rely on “legitimate interest” and the legitimate interest is the improvement of our services.
- We also use your personal data where you have contacted Us via the Website, by e-mail or telephone or participated in any surveys. In these circumstances we rely on “legitimate interest” and the legitimate interest is responding to and contacting you regarding the enquiries you have made in relation to the services We offer.

Marketing

In addition to the above uses We may use your information to notify you about goods or services which may be of interest to you. If you do not want Us to use your data in this way, please either (i) tick the relevant box situated on your service charter on which We collect your data; (ii) unsubscribe from our electronic communications using the method indicated in the relevant communication; or (iii) inform Us at any time by contacting Us at the contact details set out below.

DISCLOSURE OF YOUR INFORMATION

We routinely disclose your personal data to third parties as follows:

- We pass your information to Best Practice, who provide us with various compliance services. Best Practice is a separate data controller, and details of what they do with your data can be found here: <https://www.bestpractice.co.uk/best-practice/privacy-policy>.
- We may pass your information to our third party service providers, agents, subcontractors and other associated organisations for the purposes of completing tasks and providing services to you on our behalf (e.g. to host our servers).

We may disclose your personal data to any member of our corporate group, which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 1159 of the UK Companies Act 2006 (where applicable).

We may also disclose your personal data to third parties:

- in the event that We sell or buy any business or assets, in which case We may disclose your personal data to the prospective seller or buyer of such business or assets; or
- if We or substantially all of our assets are acquired by a third party, in which case personal data held by Us about our customers will be one of the transferred assets; or
- if We are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our client agreement/service charter; or
- to protect Our rights, property, or safety or that of our affiliated entities and our users and any third party We interact with the to provide the Website; or
- in relation to selected third parties only, only to the extent that you have consented to such selected third parties notifying you about certain goods or services, which may be of interest to you.

Other than as set out above and save insofar as is necessary in order for Us to carry out our obligations arising from any contracts entered into between you and Us or with any regulatory or other legal obligation, We will not share your data with third parties unless We have procured your express consent to do so.

STORING YOUR PERSONAL DATA

Security

If your personal details change you may update them by accessing this data through the wealth platform portal, or by contacting Us using the contact details below. If you have any questions about how We use data collected which relates to you, please contact Us by *sending a request by email to the contact details below*,

We will endeavour to update your personal data within seven (7) working days of any new or updated personal data being provided to Us, in order to ensure that the personal data We hold about you is as accurate and up to date as possible.

How long we keep your personal data

- We will hold personal data (e.g. name, address, date of birth and contact details) in line with our regulatory and legal obligations as set out by our regulator – currently a minimum of 5 years for investment business and indefinitely for occupational pension transfer or opt-out business.
- If you contact Us as a prospective customer using Our e-mail address or via Our Website contact form, requesting general information about our services, We will hold that personal data you choose to provide such as your name, address, e-mail address, for 12 months from Our last point of contact.

Keeping your personal data up to date

All of the information that We hold about you is stored on our secure servers within the EEA.

The data that We collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). By submitting your personal data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is held securely and in accordance with this Policy. Countries outside the EEA do not have the same data protection laws

as the United Kingdom and EEA and We have therefore ensured that any of our suppliers who may transfer your personal data outside the EEA has put in place appropriate measures to protect your data, either by being a member of the US-EU Privacy Shield, or by entering into a European Commission approved contract (as permitted under Article 46(5) of the General Data Protection Regulation).

If you would like further information, please contact Us or the Compliance Director at Best Practice (see 'Contact' below). We will not otherwise transfer your personal data outside of the United Kingdom or EEA or to any organisation (or subordinate bodies) governed by public international law or which is set up under any agreement between two or more countries.

YOUR RIGHTS

Under the [General Data Protection Regulation](#) you have a number of important rights free of charge. In summary, those include rights to:

- access to your personal data and to certain other supplementary information that this Policy is already designed to address
- require Us to correct any mistakes in your information which We hold
- require the erasure of personal data concerning you in certain situations
- receive the personal data concerning you which you have provided to Us, in a structured, commonly used and machine-readable format and have the right to transmit those data to a third party in certain situations
- object at any time to processing of personal data concerning you for direct marketing
- object to decisions being taken by automated means which produce legal effects concerning you or similarly significantly affect you
- object in certain other situations to our continued processing of your personal data
- otherwise restrict our processing of your personal data in certain circumstances
- claim compensation for damages caused by our breach of any data protection laws.

For further information on each of those rights, including the circumstances in which they apply, see the [Guidance from the UK Information Commissioner's Office \(ICO\) on individuals rights under the General Data Protection Regulation](#).

If you would like to exercise any of those rights, please:

- email, call or write to US or our Compliance Director at Best Practice (see the 'Contact' section below for details).
- let Us have enough information to identify you [(e.g. *account number, user name, registration details*)],
- let Us have proof of your identity and address (a copy of your driving licence or passport and a recent utility or credit card bill), and
- let Us know the information to which your request relates [including any account or reference numbers, if you have them]

HOW TO COMPLAIN

We hope that We or our Compliance Director can resolve any query or concern you raise about our use of your information.

The [General Data Protection Regulation](#) also gives you right to lodge a complaint with a supervisory authority, in particular in the European Union (or European Economic Area) state where you work, normally live or where any alleged infringement of data protection laws occurred. The supervisory authority in the UK is the Information Commissioner who may be contacted at <https://ico.org.uk/concerns/> or telephone: 0303 123 1113.

CHANGES TO OUR PRIVACY POLICY

We reserve the right to modify this Policy at any time. Any changes We may make to our Policy in the future will be notified and made available to you using the Website. Your continued use of the services and the Website shall be deemed your acceptance of the varied privacy policy.

INFORMATION ABOUT OUR USE OF COOKIES AND IP ADDRESSES

Our site (www.initiatewm.co.uk) does not currently use cookies.

CONTACT

All questions, comments and requests regarding this Privacy and Cookies Policy should be addressed to info@initiatewm.co.uk, or write to Us at Initiate Wealth Management Ltd, 68 Clarence Road, Fleet, Hampshire, GU51 3RY. Or alternatively please contact our Compliance Director at Best Practice IFA Group Ltd, Holmwood House, Broadlands Business Campus, Langhurstwood Road, Horsham, West Sussex, RH12 4QP, telephone number 01403 334455, or via email at info@bestpractice.co.uk