

## Privacy Policy

The Wealth management Group Llp take your privacy seriously. We are registered with the ICO. Our reference number is Z1051941

### 1. Where LowerMyCharges.com is the Data Controller

1.1 For the purposes of the Data Protection laws currently applicable in the UK, marketing information gathered during your site visit and/or your contact with us will be logged and controlled by us. We are, therefore, the Data Controller for this type of data. The basis for processing this type of data is Legitimate Interest. Your data will be retained for a period of two years following the last contact between us and is held on servers based in the EU and the US. You retain the right to opt out of this type of communication should you choose to do so or exercise all rights under GDPR by emailing info@lowermycharges.com.

1.2 Information we collect from you, where you choose to provide it, enables us to send you information about products, industry news and services. By providing us with your information, your consent and selecting your preferred communication methods, you consent to us processing it for this purpose. We will not pass it on to any third party. You retain the right to opt out of this type of communication.

### 2 Where LowerMyCharges.com is the Data Processor

2.1 For data relating to the delivery of regulated financial services example pensions, investments, and other regulated activities and we are the Data Processor. Information provided to us by the Data Controller, because of an agreement to provide services, will only be processed for the purposes of fulfilling the requirements of the agreement. The lawful basis for processing this type of data is Contractual and Legal Obligation. Your data is held on servers within the EU. Your data is retained according to our data retention policy and removed only on specific instruction from the Data Controller. Your data will not be transferred to a country outside the EEA without express, written permission from your Data Controller and then only when appropriate safeguards are in place as required under UK data protection law.

### 3 Information we may collect from you

We may collect and process personal data about you:

- **Personal Data** You may give us information about you, or identifiable living persons for numerous purposes and the means of collection, lawful basis of processing. Use, disclosure, retention periods for each purpose may differ.
- **Information we collect about you.** When you make an inquiry about our services you will be asked to provide information which may include some or all of the following; Full Name, Previous Names, Current Address, Date of Birth, Telephone Numbers, Email Addresses and National Insurance Number. You must ensure you have the persons permission if disclosing information about other people such as partners or spouse. Where services such as insurance are discussed we will need to collect sensitive data which may include health or criminal convictions. We will always explain in such circumstances why it is necessary to gather such information, and how it is securely stored.
- **How we use your personal information.** We use information you provide to confirm your identity and residential address for anti-money laundering purposes. This may take the form of obtaining identity documents such as passports and utility bills and may also include third parties to confirm electoral data. The law requires us to comply with a number of regulations. Where necessary, we use your personal data to allow us to fulfil our legal and regulatory requirements.
- **Information we share about you.** We will only share personal information with others when we are legally permitted to do so. When we share data with others, we put contractual arrangements and security mechanisms in place to protect the data and to comply with our data protection, confidentiality and security standards. We use third parties to help us run our business. To fulfil our contractual obligations, we may share your personal data with certain third parties including, but not limited to:

- Investment providers
- Solicitors (e.g. Trusts)
- Insurance providers (e.g. Life & Critical Illness insurance)
- Lead suppliers (if you were introduced to us by a third party)
- External consultants/advisers to assist with Risk Profiling, File Reviews, or tailored solutions
- Providers of Investment Platforms such as Transact, Hubwise Securities and others

Your personal data may be transferred to these and other authorised parties:

#### **4 Uses made of the information**

We use the information held about you in the following ways:

##### **4.1 Third party organisations that provide IT services and applications, administrative functions and support**

We use third parties to support us in providing our services and to help provide, run and manage our internal IT systems. For example, providers of information technology, cloud-based software as a service provider, website hosting and management, data analysis, data back-up, security and storage services.

The servers powering and facilitating these cloud infrastructures are located in secure data centres in the EU, and personal data may be stored in any one of them.

##### **4.2 Third party organisations that otherwise assist us in providing goods, services or information**

We use third parties acting on our behalf such as contractors, suppliers and/or agents including, processing centres for the purposes of administration, risk assessment, statistical research, marketing, product suitability and product sourcing in respect of products or services you have requested.

We will use this information in one or more of the following ways;

- to administer our website
- to provide services under a contract or agreement;
- to improve our site to ensure that content is presented in the most effective manner for you and for your computer;
- to enable verification that you are a human and not a bot (reCAPTCHA)
- to allow you to participate in interactive features of our services, when you choose to do so;
- to carry out research where permission has been granted or generic research that does not involve personal data;
- to provide your Data Controller, activity information, to enable them to manage the service we provide;
- as part of our efforts to keep our site safe and secure;
- to measure or understand the effectiveness of marketing activity we serve to you and others, and to deliver relevant marketing activity to you;
- to make suggestions and recommendations to you and other users of our site about goods or services that may interest you or them.

#### 4.3 Auditors and other professional advisers

We engage accountants and professional advisers such as Compliance Support, Paraplanning, and external independent file audits to perform specific work that helps us meet our legal, regulatory and statutory responsibilities. Any professional advisers that we use will have contractual arrangements and security processes in place to protect data and to comply with our data protection, confidentiality and security standards.

We may also exchange data with Law enforcement or other government and regulatory agencies or to other third parties as required by, and in accordance with, applicable law or regulation.

We perform anti-fraud, and security checks using your details and may receive information about you from other sources which will be added to the personal information which we already hold about you.

### 5 Accessing your data

5.1 Where providing services under contract or agreement, we may only process your data in a manner consistent with the contract or agreement. LowerMyCharges.com employees and authorised Administrators will, from time to time, be required to access your data for legitimate business purposes, such as to assist you with a support query or to investigate or resolve an issue raised by you, or your representative.

### 6 Exercising your rights

6.1 **Where LowerMyCharges.com is the Data Controller.** You may revoke your consent to the processing of your data, ask for information about any personal data we hold about you, or ask us to correct or delete that information by sending an email to [info@lowermycharges.com](mailto:info@lowermycharges.com). Please be specific about your requirement. You may be sent a form to complete and may be asked to provide identification.

Any Subject Access Request may be subject to a fee of £10 to meet our costs in providing you with the details of the information we hold about you. From May 25th, 2018, this will be free of charge unless your request is deemed excessive according to the definition given by the ICO.

6.2 **Where LowerMyCharges.com is the Data Processor.** If you are a user of our services, provided under contract, requests to revoke consent, requests to correct information held about you, requests to be deleted and requests for information must be sent to our Data Protection Officer who will take the appropriate action and advise you of the progress of your request. Such requests will not automatically be granted if subject to contractual, legal, or regulatory to maintain records.

6.3 **Other sites.** Our site may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

Any changes we may make to our Privacy Policy in the future will be posted on our website, [www.lowermycharges.com](http://www.lowermycharges.com). Please check back frequently to see any updates or changes to our privacy policy. Should you have any questions or queries about this policy, please email [info@lowermycharges.com](mailto:info@lowermycharges.com).

### Cookies

Cookies are small text files that are used by our website to make our user's experience more efficient. The current EU Cookie Law (more information) states that we can store cookies on your machine if they are essential to the operation of our site but that for all others we need your permission to do so. The Wealth Management Group Llp uses some non-essential cookies.

To learn more about cookies, including what they are, how they work and how to block them or delete them, please visit [www.aboutcookies.org](http://www.aboutcookies.org) for detailed guidance.

The following information describes the cookies that LowerMyCharges.com currently use on this site and what we use them for:

### **Session Cookies**

We use a session cookie to remember what you've been viewing and the actions you have taken. If these are disabled, various functionalities of the site will be unavailable, and you may not achieve the objective of your visit. More information on session cookies and what they are used for at [www.allaboutcookies.org](http://www.allaboutcookies.org)

### **Persistent Cookies (Google Analytics and reCAPTCHA)**

We use Google Analytics, a popular web analytics service provided by Google, Inc. Google Analytics uses cookies to help us to analyse how users use the site. It counts the number of visitors and tells us things about their behaviour overall – such as the typical length of stay on the site or the average number of pages a user views.

We also use reCAPTCHA to verify you are a human, not a bot. This also sends information to Google to enable the function. Your use of this is subject to Google Privacy Policy and Terms of Use.

The information generated by the cookie about your use of our 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, compiling reports on website activity and providing 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 undertakes not to associate your IP address with any other data held by Google. You can find out more about Google's position on privacy as regards its analytics service at [www.google.co.uk/intl/en/analytics/privacyoverview.html](http://www.google.co.uk/intl/en/analytics/privacyoverview.html)

If you have Adobe Flash installed on your computer (most computers do) and you use Lower My Charges audio or video players, Google Analytics will try to store some additional data on your computer. This data is known as a Local Shared Object or Flash cookie. This helps us to analyse the popularity of our media files. We can count the total number of times each file is played; how many people watch videos right to the end and how many people leave before the end. Adobe's website offers tools to control Flash cookies on your computer.

### **Social Buttons**

On many of the pages of the site you will see 'social buttons'. These enable users to share or bookmark the web pages. There are buttons for: Twitter, Facebook 'Like', and LinkedIn 'Share'. In order to implement these buttons and connect them to the relevant social networks and external sites, there are scripts from domains outside LowerMyCharges. You should be aware that these sites are likely to be collecting information about what you are doing all around the internet, including our site so if you click on any of these buttons, these sites will be registering that action and may use that information. In some cases, these sites will be registering the fact that you are visiting [www.lowermycharges.com](http://www.lowermycharges.com) and the specific pages you are on, even if you don't click on the button if you are logged into their services, like Google and Facebook. You should check the respective policies of each of these sites to see how exactly they use your information and to find out how to opt out, or delete, such information.

If you are happy to use our site now that you know what cookies we use and what we use them for, please click the 'Accept Cookies' button.

If you wish to control which cookies are used, you have the following options available to you:

- Click the 'Decline Cookies' button in the toolbar below which will stop Google Analytics tracking but keep session cookies enabled on this site.
- Browse the site using your browser's anonymous usage setting which is called 'Incognito' in Chrome, 'InPrivate' for Internet Explorer or 'Private Browsing' in Firefox and Safari.
- Not use this site and delete all SSLPost cookies from your chosen Internet browser. To delete any cookies that are already on your computer, please refer to [org](#) for detailed guidance regarding your chosen browser. You will need to search in your cookie folders for 'sslpost.com' to find our cookies if you wish to perform a deletion.

PLEASE NOTE: Not accepting the cookies will prevent us from learning about website visitor behaviour that helps us improve your website visit experience. It may also render areas of the website unusable.

Disallowing cookies when using our solutions, may prevent your Administrator from managing aspects of the solution. Please contact your Administrator to discuss cookies.