



W1M Privacy Notice

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Introduction

This Privacy Notice applies to the “W1M Group”, the “Group”, “we” or “our” (and all their employees, temporary staff and contractors) being the following entities:

1. W1M Group Limited
2. W1M Partners Limited
3. W1M Investment Management Limited
4. W1M Asset Management Limited
5. W1M Wealth Management Limited
6. W1M Europe, A.V., S.A.
7. W1M Caribbean Limited
8. W1M Wealth Planning LLP

This Privacy Notice forms part of our obligation to be open and fair with the individuals whose personal data we process and to provide details around how we process the personal data we collect.

“**Personal Data**” means any information identifying an individual or information relating to an individual that we can identify (directly or indirectly) from that data alone or in combination with other identifiers we possess or can reasonably access. Personal data can be factual (for example, a name, email address, location or date of birth) or an opinion about that person’s actions or behaviour.

None of the lists or examples provided in this Privacy Notice are intended to be exhaustive.

We may make changes to our Privacy Notice, and we shall endeavour to notify you if we make any material changes.

Personal Data we Collect

Information about you we collect and use includes information:

- about who you are (such as your name, date of birth, address, phone number, email and other contact details).
- that you provide to us when using any of the services we provide, or that is created during the provision of those services.
- connected to the services you receive from us (such as your bank account details).
- that you provide as part of performing anti-money laundering, financial and credit checks, as well as for fraud and crime prevention and detection purposes.
- that you provide to us for the purpose of subscribing to our marketing communications.
- contained in, or relating to, any communication you have such as meetings, phone calls, emails or letters.
- about your device and about your visits to the W1M website, including your IP address and geographical location.
- classified as special categories of personal data (such as relating to your health). This information shall only be collected and used where it is needed to provide the services (such as financial advice) or to comply with our legal obligations.

- you may provide us about other people or entities (such as joint account holders, spouses or civil partnerships, or beneficiaries of accounts you have with us).
- on children (such as where a child is the beneficiary of a trust). In these cases, we will collect and use only the information required to identify the child.
- to help us comply with court orders and to exercise and defend our legal rights.

We may also collect any other Personal Data that may be sent to us and which we are required to use for legitimate business purposes.

Before you disclose to us the Personal Data of another person, you must obtain that person's consent to both the disclosure and the processing of that Personal Data in accordance with this Privacy Notice.

How we Collect Personal Data

We may collect Personal Data about you from a variety of sources, including:

- an application form from our services;
- phone conversations with us;
- emails or letters you send to us;
- meetings with one of our relationship managers or other employees;
- registering for one of our events or seminars; or
- our online services such as our websites, social media or portal.

We may also collect Personal Data on you from commercially or publicly available sources (such as business directories). This may be to check or improve the information we hold or to obtain contact information.

If you have another financial adviser, a solicitor, an accountant or a third party introducer, the information we collect and use may have been provided by them on your behalf.

Using your Personal Data

We will collect and use your information where:

- you have given us your permission (consent); or
- it is necessary to provide the services you have requested and fulfil our contractual obligations with you. For example, if you wish for us to manage your assets, we will require some Personal Data including your name, address, date of birth, and bank account details; or
- it is necessary for us to meet our legal and/or regulatory obligations (such as, to send you account valuations, tell you about changes to our discretionary management agreement or terms of business, and for the detection and prevention of fraud and other financial crimes); or
- it is in the legitimate interest of the W1M Group. For example, to deliver the appropriate information and guidance so that you are aware of the options that will help you get the best outcome for your services; or

- where we need to process your information to better understand you and your needs to send you more relevant communications about our services and to develop new services; or
- it is in the legitimate interests of a third party (such as sharing information with your tax adviser for your tax filings).

If you do not wish for us to collect and use your Personal Data in these ways, it may mean that we will be unable to provide you with our services.

Complying with AML/CTF Obligations

We may process Personal Data to comply with the relevant obligations under the Anti-Money Laundering and Counter Financing of Terrorism (AML/CTF) regulation and carry out the following actions:

- obtaining information collected from third party sources such as providers of targeted information international lists;
- processing of Personal Data related to individuals qualifying as Politically Exposed Persons (PEPs);
- processing of Personal Data connected to information about financial sanctions according to the relevant international lists;
- collection and processing of Personal Data for the purposes of complying with the AML/CTF obligations of the W1M Group;
- communicating personal data within W1M Group entities for the purposes of complying with the obligation under AML/CTF regulation;
- submitting information periodically or due to a specific request to the relevant authorities, which may include the competent authority for AML/CTF matters in the UK, the **Financial Conduct Authority (FCA)** or in Spain, **Commission for the Prevention of Money Laundering's Executive Service (SEPBLAC)** and the **Spanish Securities Markets Commission (CNMV)**.

Disclosing Personal Data

We may share your information across our different Group companies (or across business lines within the W1M Group), as part of our need to know, as part of improving our existing services, or as part of providing new services.

We may also share your information with third parties for the reasons outlined in 'Section **Error! Reference source not found.** – Using Your Personal Data' above.

These third parties include:

- companies we have chosen to support us in the delivery of the services you receive from us, including our technology suppliers and legal, financial and corporate advisors (including, consultants and contractors);
- your external financial adviser, accountant, solicitor or other party who introduced you to us, or you instruct us to provide information to;
- to any regulator, external auditor or applicable body or court where we are required to do so by law or regulation or as part of any investigation. The regulators of our companies include the Financial Conduct Authority (FCA), the US Securities and Exchange Commission (SEC), the Spanish Securities

Markets Commission (CNMV), Commission for the Prevention of Money Laundering's Executive Service (SEPBLAC) and the Information Commissioner's Office (the ICO);

- to any central or local government department and other statutory or public bodies, such as HM Revenue & Customs (HMRC);
- law enforcement, credit and identity check agencies for the prevention and detection of crime;
- to any prospective buyer in the event we sell any part of our business, or its assets, or if substantially all of our assets are acquired by a third party.

We will undertake a search with a credit reference agency for the purposes of verifying your identity. To do so, the credit reference agency may check the details you supply against any particulars on any database (public or otherwise) to which they have access.

They may also use your details in the future to assist other companies for verification purposes. The credit reference agency may disclose that information, and the fact that a search was made, to its other customers for the purposes of assessing the risk of giving credit, to prevent fraud, money laundering and to trace debtors. A record of the search will be retained by the credit reference agency.

We will not, without your consent, disclose or supply your personal data to any third party for the purpose of their or any other third party's direct marketing. When we share your personal information, we will do so in line with our obligations to keep your information secure.

Retaining Personal Data

We will keep your Personal Data where it is necessary to provide you with our services while you are a client or looking to become a client. Personal Data that we process, for any purpose or purposes, shall not be kept for longer than is necessary. The W1M Group retains records in line with any business-as-usual retention requirements, legal, regulatory or contractual obligations.

Securing Personal Data

Where W1M Group acts as the controller of Personal Data, it will ensure that necessary and adequate safeguards are in place to prevent unauthorised access, loss, misuse or alteration of your Personal Data. We store most Personal Data electronically on secure servers with relevant market-standard access, encryption and firewall controls.

Any Personal Data sent to us, either in writing or in email, may be insecure in transit and we cannot guarantee its delivery.

International Data Transfers

The majority of your Personal Data is processing in the United Kingdom and the European Economic Area (EEA). However, some of your Personal Data may be processed outside of the UK and EEA, including countries such as the United States, Canada and Barbados.

Where your information is being processed outside of the UK and EEA, we take additional steps to ensure that your information is protected and put in place legal agreements with our third party providers to address this.

Your Rights

You have a number of rights in relation to how the W1M Group uses your information. Your rights are as follows:

Right to Be Informed

You have a right to receive clear and easy to understand information on what personal data we have, why and who we share it with. We explain this in this Privacy Notice.

Right of Access

You have the right of access to your personal information. If you wish to receive a copy of the Personal Data we hold on you, you may make a subject access request (SAR) to the W1M Group Data Privacy Manager (contact details are below). The provision of such information will be subject to the provision of appropriate evidence of your identity. In certain instances, where legal exemptions exist, we may withhold Personal Data that you request.

Please note it can take up to 30 days for a request to be fulfilled.

Rights to Request that your Personal Data Be Rectified

If your Personal Data is incorrect or incomplete, you can request for us to correct it.

Right to Data Portability

You can ask for a copy of your Personal Data for your own purposes to use with a different service provider.

Please note it can take up to 30 days for a request to be fulfilled.

Right to Request Erasure

You can ask for your Personal Data to be deleted or removed if there is not a compelling reason for the W1M Group to continue to have it. Requesting erasure may result in our inability to provide services to you, or we may have legitimate interests or record keeping obligations meaning we will not be able to fully comply with your request.

Please note it can take up to 30 days for a request to be fulfilled.

Right to Restrict Processing

You can ask that we block or suppress the processing of your Personal Data for certain reasons. This means that we are still permitted to keep your information, but to ensure we do not use it in the future for those reasons you have restricted. Restricting processing may result in our inability to provide services to you, or we may have legitimate interests or record keeping obligations meaning we will not be able to fully comply with your request.

Right to Object

You have the right, at any time, to ask us not to process your personal data for marketing purposes. You can optout of receiving email communications simply by clicking the unsubscribe link, which is contained within marketing emails. You can update your direct marketing preferences by emailing or writing to the W1M Group Data Privacy Manager (contact details are below).

Please note it can take up to 30 days for a request to be fulfilled.

Complaints

We strive to collect, use and protect your Personal Data in line with applicable data protection laws. If you do not believe we have handled your information as set out in our Privacy Notice, please send your complaint to the W1M Group Data Privacy Manager (contact details are shown in section [*] below).

If you are still Unhappy, you can Complain to the ICO:

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

Telephone: +44 0303 123 1113

In EU you can Complain to the AEPD:

Agencia Española de Protección de Datos
C/ Jorge Juan 6
28001 Madrid
Spain

Telephone: +34 900 293 183

Third Party Websites

We are not responsible for the practices employed by third party websites linked to or from our website nor the information or content contained in them. Often links to other websites are provided solely as reference points to information on topics that may be useful to the users of our website.

Please remember that when you use a link to go from our website to a third- party website, our Privacy Notice will no longer apply. Your browsing and interaction on any other website, including third party websites, which have a link on our website, are subject to that website's own Privacy Notice.

L&C Waverton Websites – Use of Cookies

W1M Group records the number of visitors to the relevant sections of our website and tracks movement between the pages on our website by means of "cookies". Cookies are small data files containing anonymous information placed on your computer and are automatically downloaded to a user's hard drive in order to recognise a user that has visited our website previously.

The W1M Group reserves the right to use cookies in order to analyse trends and to improve the design and layout of its website. You cannot be identified as an individual from this type of information. More information on our Cookie Policies can be found at www.w1m.com.

Our Details

If you have any questions about our Privacy Notice or the information we collect or use about you, please contact:

L&C WAVERTON GROUP - DATA PRIVACY MANAGER (DPM)

Thomas Donlon, Data Privacy Manager
W1M Group
16 Babmaes Street
London SW1Y 6AH

Email: gdpr@w1m.com

Telephone: +44 020 7396 3200

OUR EU DATA PROTECTION OFFICER (DELEGADO DE PROTECCIÓN DE DATOS, 'DPD')

Thomas Donlon
General Mitre 126,
6th floor Barcelona,
08021 Spain

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