



FOX BROOK  
wealth management limited

## Privacy Policy

Foxbrook Wealth Management Ltd takes the privacy of personal data seriously and the legal and compliant treatment of this data is at the core of our operations.

We therefore ask you to please read the following important information which explains how we collect, store and use your personal data.

Foxbrook Wealth Management Ltd is registered under the Data Protection Act (DPA) 1998. The General Data Protection Regulation (GDPR) has revised provisions of the DPA 1998, and as such our privacy policy has been amended accordingly. The GDPR is enforceable from 25th May 2018.

### 1. Who are we?

Foxbrook Wealth Management Ltd is a restricted financial adviser, offering restricted financial advice to individuals, trustees and their businesses.

Foxbrook Wealth Management Ltd (Company No. 09887548) has its registered office at Foxbrook House, Old Warwick Road, Rowington, Warwick, CV35 7AB.

### 2. What do we mean by Personal Data?

By personal data (or personal information), we mean information that relates to you and is used to identify you, either directly or in conjunction with other material we hold.

### 3. How do we collect information from you?

We collect personal information about you as and when you consent to us doing so by signing our Data Consent forms. We gather your consent in writing before entering into business relations with you.

### 4. What type of information do we collect?

The information we collect may include your name, address, email address and phone number. Furthermore, information about your health, lifestyle, finances and bank details can be collected depending whether it is necessary for the advice we are providing.

We may also ask for evidence of your identity, for example your passport, driving license, proof of residence or income.

### 5. Why do we collect information from you?

We use your personal information for the following:

1. Provision of advice and services or to provide you with the information, products and services you have requested from us.
2. To comply with legislation in relation to anti money laundering regulations and the Financial Services Act.

Foxbrook Wealth Management Limited is authorised and regulated by the Financial Services Conduct Authority

## **6. How do we protect your personal information?**

Any personal information we collect, record, or use in any way, be it on computer, hard copy or in any other form, is secured through our safeguarding processes to ensure that we meet our obligations under the Data Protection Act 1998.

## **7. What are your rights surrounding your personal information?**

The GDPR enhances your rights surrounding your personal data. This includes:

1. The right to be informed – we will provide you with a copy of this privacy policy before seeking your consent to store/process your personal data.
2. The right of access – you have the right to request a copy of any personal information we hold on you. This will be provided in a structured format, free of charge, within 30 days of your request. Requests can be made in writing, by phone or by email, to any of our contact details provided below.
  - Foxbrook House, Old Warwick Road, Rowington, Warwick, CV35 7AB
  - 01926 839900
  - [martingreen@foxbrookwm.co.uk](mailto:martingreen@foxbrookwm.co.uk)
3. The right to rectification – you have the right to request us to rectify any of your personal data which you believe is inaccurate or incomplete. We will respond within one month (this can be extended by two months where the request for rectification is complex). Requests can be made in writing, by phone or by email, to any of our contact details provided above.
4. The right to erasure – you have the right to request ‘to be forgotten’, i.e. for us to delete all records of your personal data. We will comply with your request, unless we have a legal obligation to continue to hold your personal data, in which case we will inform you of the reason we are unable to complete your request.
5. The right to restrict processing – you have the right to ‘block’ or suppress processing of personal data – in this case we will retain just enough information about you to ensure that the restriction is respected in future.
6. The right to data portability – you may request a copy of your personal data, in order to use it for your own purposes across different services, e.g. moving it from one IT environment to another in a safe and secure way. We will provide the data in a structured, commonly used and machine-readable form, e.g. CSV files. This will be provided free of charge and within one month (this can be extended by two months where the request is complex).
7. The right to object – you have the right to object to us processing your personal data for direct marketing purposes, and historical or statistical purposes, and we will respect this request as soon as we receive it (by post / email / phone, details of which are provided above).

## **8. Who do we share your personal information with?**

We will only share your personal data with third parties when it is necessary for the service you have asked us to provide, and we will have contracts/safeguards in place to ensure that they treat the privacy of your personal data with the same importance as we do. You will be advised of the specific third parties with whom we may share your data.



These third parties, amongst others, may include:

- **The Financial Conduct Authority**
- **Providers of financial services, insurance and investment products and services in respect of whom you request** us to submit applications on your behalf and to receive updates from such providers in order for us to provide our services to you throughout the lifetime of our relationship with you;
- To our **suppliers and partners** in order for them to help us provide our services to you, this includes:
  - our **IT systems providers** to assist us with providing you with an efficient, modern and professional service.
  - our suppliers of **audit and regulatory compliance support services** who may review our records containing your personal information in order to audit and report to us on our compliance with applicable laws and regulatory requirements.
  - our **product research and comparison providers** to assist us with providing you with the product which meets your needs.
  - our **risk profiling provider** to assist us in analysing your attitude to investment risk.
- to a **prospective buyer** (and its agents and advisers) in the event we intend to sell any part of our business or its assets or if substantially all of our assets are acquired by a third party, in which case your personal information could form part of one of the assets we sell, provided that we inform the buyer it must use your personal information only for the purposes described in this Notice. We will never rent or sell your personal information other than as part of a sale of our business;
- to any **national and/or international regulatory, enforcement body, government agency or court** where we believe disclosure is necessary
  - (i) as a matter of applicable law or regulation (including where we are required by law to provide information to organisations such as HMRC),
  - (ii) to exercise, establish or defend our legal rights, or
  - (iii) to protect your vital interests of those of any other person; and
- to any **other person with your consent** to the disclosure or where we are permitted to do so by law.

## 9. Data Retention

We retain personal information we collect from you where we have an ongoing legitimate need to do so, for example:

- to provide you with a product or service you have requested us to provide,
- to perform our contractual obligations to you;
- to comply with applicable legal, tax or accounting requirements;
- to defend or manage any claims or complaints between us, you and any relevant third party including taking legal advice in respect of such claims in order to establish, exercise or defend our

legal rights or such claims. This would include complaints and claims which you may bring against us or which are submitted to a court, regulatory authority or ombudsman.

When we have no ongoing legitimate need to process your personal information, we will either delete or anonymise it or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

#### **10. Updates to this Policy**

This Privacy Policy will be reviewed periodically and updated to comply with any new legislation – the most recent of which, the GDPR is currently being introduced and will be enforceable from 25th May 2018.

This policy was last updated in May 2018.