



WISE INVESTMENT

PLANNING FOR LIFE

Privacy Policy

Effective from 1st September 2021

A Introduction

Wise Investment (“we”, “us” and “our”) take the privacy and security of your personal data very seriously. This Privacy Notice applies to our collection and use of personal data through our website (the “Site”) and through our offline business-related interactions with you.

B About us and contact details

Wise Investments Limited (trading as Wise Investment) whose registered office is at The Great Barn, Chalford Park Barns, Oxford Road, Chipping Norton, Oxfordshire, OX7 5QR acts as a data controller in relation to all personal data which is collected through this Site.

If you have any questions, comments or suggestions about this Privacy Policy or our privacy practices, please contact us at wise@wiseinvestment.co.uk. Alternatively, letters may be sent to the registered office address marked: “Attention: Privacy”.

C Information we may collect about you

We may collect the following types of personal data about you:

- your name, and contact information such as address, email address and telephone number;
- your date of birth, national insurance number (or other tax identification number) and other due diligence information; and
- financial information.

We may also collect:

- more sensitive personal data (“special category”) about you such as information concerning your health and medical conditions. Where necessary we will obtain your explicit consent to collect and process this information. We will ensure you are provided with clear information as to why this information is required and the purposes for which it will be used. For example, we may collect information concerning your health and medical conditions so that we can recommend suitable service(s) for you and continue to tailor them to meet your financial objectives;
- or receive personal data about you from other sources, which could include commercially available sources, such as public databases and data aggregators to the extent permitted by applicable data protection laws;
- information from you through cookies (Please see our separate Cookie Policy at www.wiseinvestment.co.uk/cookies)

D How we use the personal data you provide to us (purpose and legal basis)

We may process your personal data for the purposes and on the legal basis as follows:

- **Performance of a contract between us** – our processing is necessary for the performance of a contract with you or in order to take steps at your request prior to entering into a contract. We use your personal data for account set-up, understanding your needs, answering any queries and providing our services to you;
- **Legitimate Interests** – this processing takes place when it is consistent with the general operation of our business in a client focused manner and does not prejudice your rights and freedoms. This basis is used to allow us to administer our business operations, engage third party technology providers, evaluate our general performance and effectiveness, train our staff and manage communications with you in relation to services from us, which we think may be of interest to you. If you do not wish to receive such information, please let us know now or at any time in the future, and your details will be removed from our mailing list(s);
- **Compliance with legal obligations** – this is where we use personal data to confirm your identity, for anti-money laundering and 'know your client' purposes both at the outset or at any time during our relationship. This may also involve us passing data to credit reference agencies, liaison with HMRC or other overseas tax authorities as well as to comply with any rules or authorities to which we are subject; and
- **Consent** – where we have your clear consent to do so.

E Who has access to your personal data?

Your personal data may be made available only to staff members that strictly require such data on a need-to-know basis. We also sometimes employ other companies and individuals to perform functions on our behalf, e.g., providing technical support for the systems where your personal data is held, and this may involve an international transfer outside the UK in the context of technology platforms (please see F - **International Data Transfers** below).

Such recipients may need access to your personal data to perform their functions but will not use your personal data for any other purpose. We will only ever share your personal data in accordance with the protections mandated by UK GDPR.

We may also disclose personal data to comply with our legal or regulatory obligations. We do not rent or trade email lists with other organisations and businesses.

F International Data transfers

Your personal data may be transferred to countries located outside your country, including to countries that may not provide a similar or adequate level of protection to the UK or EEA.

In particular, we may share your personal data with third parties located or headquartered in the USA, in which case we would only do so subject to the necessary protections mandated by UK GDPR and specifically by implementing the standard data protection clauses adopted by the UK ICO together with supplementary safeguards.

G Security

The security of your personal data is important to us. We take reasonable steps, including technical, administrative and physical safeguards, designed to protect the personal data submitted to us from loss, misuse and unauthorized access, disclosure, alteration and destruction.

We will ask any agents and service providers to whom we may transfer your personal data take comparable steps to protect that security. However, no method of security or method of

transmission over the Internet is entirely secure. You should always use caution when transmitting personal data over the Internet.

H Retention of your personal data

We may retain your personal data for as long as your personal data is needed for the specific business purpose for which it was collected. In some cases, we may be required to further retain your personal data to comply with laws or regulations or other legal obligations, resolve disputes and enforce our agreements.

I Marketing

We may contact you periodically by email to provide you with programs, products, services and content that may be of interest to you. If applicable law requires that we receive your explicit consent (“opt in”) before we send you certain types of marketing communications, we will only send you those types of communications after receiving your explicit consent.

If you wish to stop receiving these types of communications from us, you can opt-out at any time by contacting us at the email and address as described below.

J WIFI

If you visit our offices and use our guest wi-fi we can access data about your device, the volume of data which you use and your usage by access time, frequency and location. However, we do not retain these records.

K Your rights

Under certain circumstances, you have the right to:

- Request access to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it;
- Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected;
- Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request;
- Object to processing of your personal data, on grounds relating to your particular situation, where we are relying on a legitimate interest (or those of a third party) but you feel it impacts on your fundamental rights and freedoms; Where your personal data is processed for direct marketing purposes, you have the right to object at any time to processing of your personal data without reason;
- Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data: (a) if you want us to establish the data’s accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it;
- Request the transfer of your personal data to you or to a third party (commonly known as “right to data portability”)

- Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent.

If you wish to exercise any of these rights, please Contact Us either by post by writing to:

The Compliance Officer
Wise Investments Limited
The Long Barn
Chalford Park Barns
Oxford Road
Chipping Norton
Oxfordshire
OX7 5QR

Or email us at wise@wiseinvestment.co.uk

You also have the right to lodge a complaint in relation to any processing which we undertake in relation to your personal data with your competent supervisory authority.

The data protection authority competent in the UK is the Information Commissioner's Office (ICO), which can be contacted at <https://ico.org.uk/>.

We may change this Privacy Policy from time to time. Therefore, we may ask you to check this Privacy Notice occasionally to ensure that you are aware of the most recent version. We will notify you of any changes where We are required to do so. **The latest version will always be available on the Wise Investment website www.wiseinvestment.co.uk**

REGISTERED OFFICE

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Wise Investments Limited is authorised and regulated by the Financial Conduct Authority