

## Privacy Policy



### Who we are

We are DHM Wynchwood LLP.

This Privacy Policy applies to DHM Wynchwood LLP and its appointed representative Wynchwood Investments Limited.

### How to contact us

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

Complaints Manager  
DHM Wynchwood LLP  
8 Shottery Brook Office Park  
Timothy's Bridge Road  
Stratford upon Avon  
CV37 9NR

Email: [office@dhmwynchwood.co.uk](mailto:office@dhmwynchwood.co.uk)

### Your rights, information and how we use it

We treat your privacy very seriously and have established a Privacy Policy to ensure we treat your personal details with care and that we also comply with all applicable UK data protection legislation.

Our Privacy Policy contains important information about what personal details we collect; what we do with that information; who we may share it with and why; and your choices and rights when it comes to the personal details you have given us.

We may need to make changes to our Privacy Policy from time to time. If there are important changes, such as where your personal details will be processed, we will advise you.

This version of our Privacy Policy was last updated **May 2018**.

### Information we collect and use

This includes:

- Information about who you are e.g. name, age, date of birth and contact details;
- Information regarding your financial affairs, e.g. assets/liabilities, income/expenditure, your attitude to risk and investment objectives;
- Information connected to your product or service with us e.g. your bank account details, plans/policies you hold;
- Information about your contact with us e.g. meetings, phone calls, emails / letters;
- Information that is automatically collected e.g. via cookies when you visit one of our websites;
- Information classified as 'sensitive' personal details e.g. relating to your health, marital or civil partnership status. This information will only be used where it is needed to

provide the advice, product or service you have requested or to comply with our legal obligations;

- Information you may provide us about other people e.g. joint applicants or beneficiaries for products you have or services you require; and
- Information on children e.g. where a child is named as a beneficiary on the policy taken out by a parent or guardian on their behalf. In these cases, we will use only the information required to identify the child (such as their name, age, gender).

### **What are cookies?**

A cookie is a small file of alphanumeric characters that is downloaded to your computer's hard drive via your web browser, that enables the website you are accessing to recognise your device. They are widely used to help aid website efficiency as well as provide information to the website owners.

DHM Wynchwood's website currently uses cookies to log your visit and recognise when you return. You should be able to disable the acceptance of cookies via your web browser.

For more information on cookies, including how to manage and delete them visit <https://ico.org.uk/for-the-public/online/cookies/>

### **Where we collect your information**

We may collect your personal details directly from you, from a variety of sources, including:

- a Fact Find or Investment Risk Profile Questionnaire;
- an application form for a product or service;
- phone conversations with us;
- emails or letters you send to us; and
- meetings with one of our financial advisers, paraplanners or support staff.

If you are a member of your employer's pension scheme, the information we collect and use may have been provided by them on your behalf.

We may also collect personal details from places such as business directories and other commercially or publicly available sources e.g. to check or improve the information we hold (like your address or your company information) or to give better contact information if we are unable to contact you directly.

### **What we collect and use your information for**

We take your privacy seriously and we will only ever collect and use information which is personal to you where it is necessary, fair and lawful to do so. E.g. where:

- it is necessary to provide the product or service you have requested e.g. if you wish to invest in a pension or savings product, we will require personal details including your name, address, date of birth, bank account details, financial affairs and objectives etc;
- it is necessary for us to meet our legal or regulatory obligations e.g. to send you periodic Valuations, tell you about changes to Terms and Conditions or for the detection and prevention of fraud or anti-money laundering;



- it is in the legitimate interests of DHM Wynchwood LLP / Wynchwood Investments Ltd e.g. to deliver appropriate information and guidance so you are aware of the options that will help you get the best outcome from your service, product or investment; where we need to process your information to better understand you and your needs so we can send you more relevant communications about the products you have or improve the services offered to you; and
- it is in the legitimate interests of a third party e.g. a product provider, or sharing information with your employer for the governance of a pension scheme of which you are a member.

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

We sometimes use systems to make automated decisions (such as online underwriting or for making annuity comparisons) based on personal details we have - or are allowed to collect and use from others - about you. These automated decisions can affect the products, services or features we offer you now or in the future. We use automated decisions in the following ways:

- Tailoring products and services e.g. to make decisions about the products and services we may recommend to you in order to help meet your needs

### **Who we may share your information with**

We may share your information with third parties for the reasons outlined in 'What we collect and use your information for.'

These third parties include:

- Product providers e.g. pension, investment or mortgage providers we are recommending to you;
- Your other advisers or employer;
- Companies we have chosen to support us in the delivery of the products and services we offer to you and other customers e.g. research or underwriting; or companies who can help us in our contact with you, for example an internet service provider;
- Our Regulators and Supervisory Authority e.g. the Financial Conduct Authority (FCA), the Information Commissioner's Office for the UK (the ICO); and
- Law enforcement, credit or identity check agencies and Her Majesty's Revenue & Customs (HMRC) for the prevention and detection of crime, such as Money Laundering.

We will never sell your details to someone else. Whenever we share your personal details, we will do so in line with our obligations to keep your information safe and secure.

### **Where your information is processed**

Normally your information is processed only in the UK, which enjoys the same Data Protection rules as the rest of the EU.

If your information is being processed outside of the EEA (e.g. if you request us to do so), we take additional steps to ensure that your information is protected to at least an equivalent level as would be applied by UK / EEA data privacy laws e.g. we will put in place legal agreements with our third party suppliers and do regular checks to ensure they meet these obligations.

### **How we protect your information**

We take information and system security very seriously and we strive to comply with our obligations at all times. Any personal details which are collected, recorded or used in any way, whether on paper, online or any other media, will have appropriate safeguards applied in line with our data protection obligations.

Your information is protected by controls designed to minimise loss or damage through accident, negligence or deliberate actions.

### **How long we keep your information**

We will keep your personal details only where it is necessary to provide you with our products or services while you are a customer.

We may also keep your information after this period but only where required to meet our legal or regulatory obligations. The length of time we keep your information for these purposes will vary depending on the obligations we need to meet.

### **Your individual rights**

You have rights in relation to how DHM Wynchwood LLP / Wynchwood Investments Limited use your information. Such as:

- ***Right to be informed***

You have a right to understand what personal details we have, why and who we share it with – this is explained in this Privacy Policy and other privacy notices, which may be embedded within our documentation such as our Fact Find.

- ***Right of access***

You have the right of access to your personal details. If you wish to receive a copy of the personal details we hold on you, you may make a data subject access request (DSAR). So long as the request is not manifestly unfounded or excessive, we will send the information to you within 30-days.

- ***Right to rectification***

If your personal details are inaccurate or incomplete, you can request that they are corrected.

- ***Right to request erasure***

You can ask for your information to be deleted or removed if there is not a compelling reason for DHM Wynchwood LLP / Wynchwood Investments Ltd to continue to have it.

- **Right to restrict processing**

You can ask that we block or suppress the processing of your personal details for specific reasons. This means that we are still permitted to keep your information – but only to ensure we don't use it in the future for those reasons you have restricted.

- **Right to data portability**

You can ask us to move, copy or transfer relevant personal details we hold to another company in a safe and secure way. E.g. if you were moving your pension to another pension provider.

- **Right to object**

You can object to DHM Wynchwood LLP / Wynchwood Investments Ltd processing your personal details if they were used for a purpose you are not in agreement with, such as for direct marketing.

- **Rights related to automatic decision making including profiling**

You have the right to ask DHM Wynchwood LLP / Wynchwood Investments Ltd to:

- give you information about its processing of your personal details (e.g. for online annuity quotation comparisons);
- request human intervention or challenge a decision where processing is done solely by automated processes (e.g. online underwriting decision tools); and
- carry out regular checks to make sure that automated decision making processes are working as they should (e.g. review online automated system providers).

### **How to make a complaint**

We will always strive to collect, use and safeguard your personal details in line with data protection laws. If you do not believe we have handled your information as set out in our Privacy Policy, please contact us (details on page 1) and we will do our utmost to make things right.

If you are still unhappy, you can complain to the Information Commissioners Office. Their contact details can be found via the below website address. The Information Commissioner's Office also provides information and guidance on an individual's data protection and rights:

[https://www.ico.gov.uk/Global/contact\\_us.aspx](https://www.ico.gov.uk/Global/contact_us.aspx)