

Privacy Policy

Blackfriars Wealth Management Ltd understands your concerns over the privacy of Personal Data you may submit through the use of this website.

This policy provides you with information about what types of information is collected, what tracking takes place, how we use the collected information and with whom we share the information.

By providing Personal Data to Blackfriars Wealth Management Ltd via this website, over the phone, by email or in person you agree to the terms and conditions of this policy.

The information we collect

Personal Data is anything which identifies you as an individual, either on its own or by reference to other information. We may collect the following Personal Data from you when you use our website:

- information such as name, address, email address or contact number which are collected to support the transactions carried out between you and us;
- information about your computer and about your visits to and use of this website (including your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation); and
- any other information that you choose to send to us.

Cookies

A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser, and stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server. This enables the web server to identify and track the web browser.

We use "session" cookies on the website. Session cookies will be deleted from your computer when you close your browser.

We will use the session cookies to: keep track of you whilst you navigate the website; prevent fraud and increase website security.

We use Google Analytics to analyse the use of this website. Google Analytics generates statistical and other information about website use by means of cookies, which are stored on users' computers. The information generated relating to our website is used to create reports about the use of the website. Google will store this information. Google's privacy policy is available at: <https://www.google.com/privacypolicy.html>.

Most browsers allow you to reject all cookies, whilst some browsers allow you to reject just third party cookies. For example, in Internet Explorer you can refuse all cookies by clicking "Tools", "Internet Options", "Privacy", and selecting "Block all cookies" using the sliding

selector. Blocking all cookies will, however, have a negative impact upon the usability of many websites.

How we use the Personal Data we collect

Personal Data submitted to us via this website will be used for the purposes specified in this privacy policy.

We will use the Personal Data for the purpose of:

- answering any enquiry you raise;
- delivering and supporting the services you request;
- administering your customer account, and to support other general business activities;
- administering and enhancing the website;
- improving your browsing experience by personalising the website;
- satisfying legal or regulatory requirements;
- as otherwise described in this policy.

The duration for which we retain the Personal Data will differ depending on the type of data and the reason why it was submitted. However, in some cases Personal Data may be retained on a long term basis: for example, if you use our services basic Personal Data about you will normally be retained for so long as you receive those services from us, and Personal Data that we need to retain for legal purposes will normally be retained for at least six years in accordance with usual commercial practice and regulatory requirements.

Disclosures

We may disclose information about you to other organisations who provide specific business services to us.

Such organisations are required to handle your Personal Data in accordance with applicable laws related to privacy and data protection.

Service providers – organisations who require your Personal Data in order to deliver the services which you have requested from us.

General Service providers – who provide specific, ad-hoc services to us. For example, courier services.

Cloud Service Providers - who host bespoke business applications that allow us to improve the efficiency and effectiveness of our general business activities.

Auditors - used to validate our compliance with the Vendor's contractual Terms and Conditions. For example, Personal Data (email address) may be used to confirm our licence management procedures are correct.

Other persons or organisations permitted or required by applicable law or regulation.

Except as provided in this privacy policy, we will not disclose Personal Data to any other category of organisation.

Legitimate Interests

We may also process your personal data because it is necessary for our or a third party's (this is a person or organisation external to Vision) legitimate interests. Our "legitimate interests" include our commercial interests in operating our business (and the business of Vision and the Rathbone Group more generally) in a client focused, efficient and sustainable manner, in accordance with all applicable legal and regulatory requirements. In this respect, we may use your personal data for the following:

- to monitor and evaluate the performance and effectiveness of our services, including by training our staff or monitoring their performance, and for the monitoring of communications, as set out in the section below.
- outsourcing selected 'back office' functions to third parties (for example, vendors of hosted software solutions or cloud storage providers) for the purposes of efficient, fast and secure access to information across Vision and the Rathbone Group;
- to seek advice on our rights and obligations, such as where we require our own legal advice;
- as part of a reorganisation, sale or negotiations for sale of all or part of our business;
- to follow up with you after you request information to see if we can provide any further assistance and for more general marketing purposes, including in order to keep you informed (by letter, telephone, email and other electronic means) of services from us and other Rathbone Group members which 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). We will not provide your personal data (or sensitive personal data) to organisations other than members of the Rathbone Group to use for their own marketing purposes without your consent.

International data transfer

Information that we collect may be stored and processed in and transferred between any of the countries in which services are located in order to enable us to use the information in accordance with this privacy policy.

Information which you provide may be transferred to countries which do not have data protection laws equivalent to those in force in the European Economic Area.

We will only transfer Personal Data when satisfactory safeguards are in place.

Your rights

You have the right to:

- request confirmation whether we hold your Personal Data and, if so, to access that Personal Data. We will inform you of: the purposes for which the Personal Data is processed; the categories of the Personal Data processed; whether your Personal Data has been disclosed and the categories of recipient of the disclosure; whether your Personal Data has been transferred to another country or international organisation; the expected period for which the Personal Data will be stored. If we did not obtain the Personal Data directly from you, we will also inform you of the source. We may withhold such Personal Data to the extent permitted by law.

- request correction of the Personal Data we hold.
- request erasure of your Personal Data, subject to any legal obligation to which we are subject or where the processing of the Personal Data is for the establishment, exercise or defence of legal claims. We will accept your request for erasure where we have a legal obligation so to do, acceptance of such a request is otherwise at our discretion. Please be aware that the erasure of your Personal Data may affect our ability to provide the website and the services associated with it to you and in some cases our acceptance of an erasure request may require your account to be closed.
- restrict processing of your Personal Data where you contest the accuracy of the Personal Data we hold, consider our processing to be unlawful, consider that we no longer need the Personal Data but it is required by you in relation to a legal claim or where you have objected to our processing in accordance with your legal rights, provided in each case that we shall only be required to apply such restriction where we have a legal obligation to do so and until the issue giving rise to the restriction is resolved.
- withdraw any consent that you have previously given to our processing of your Personal Data.
- receive the Personal Data you have provided to us in a structured, commonly used and readable format, where the processing is carried out by automated means. We may withhold such Personal Data if it adversely affects the rights and freedoms of others.
- object to the processing of your Personal Data, for example the use of your Personal Data for direct marketing purposes.

While we will restrict the processing of your Personal Data in line with your request, we may add your Personal Data (name and address) to a 'suppression list' to ensure we do not send any communications in the future.

Children

We will never knowingly collect Personal Information from minors (children under 16 years of age, or any other age defined under applicable law). If we become aware that a minor is attempting to or has submitted Personal Information, we will notify them that we will not accept his or her Personal Information. We will then remove any such Personal Information from our records.

Updating information

Please let us know if the Personal Data which we hold about you needs to be corrected or updated. Failure to inform us of a change to your Personal Data may result in the suspension, or withdrawal, of your services.

Third party websites

The website contains links to other websites. We are not responsible for the privacy policies or practices of third party websites. We recommend that you make yourself familiar with the privacy policy for any third-party website you visit.

Questions about this Privacy Policy

If you have any questions about this Privacy Policy or our treatment of your Personal Data, please contact us by writing to Mark Williamson, Blackfriars Wealth Management Ltd 40b London Road, Gloucester, GL1 3NU or by using the email address mark@blackfriarswm.co.uk or call us on 01452 522054. In the unlikely event that you have a complaint about our treatment of your Personal Data, it will be dealt with in accordance with our complaints handling procedure. You should contact the Mark Williamson, who will respond to you within 28 days.

If we are unable to resolve your complaint, you may make a complaint to the Information Commissioner's Office. Please see <https://ico.org.uk/for-the-public/raising-concerns> for more information.

Whilst this privacy policy sets out a general summary of your legal rights in respect of your Personal Data, this is a complex area of law and this privacy policy is not intended to represent legal advice. More information about your rights in respect of your Personal Data can be found on the Information Commissioner's website at <https://ico.org.uk/for-the-public>

Data controller

The data controller responsible in respect of the information collected on this website is Mark Williamson, Blackfriars Wealth Management Ltd 40b London Road, Gloucester, GL1 3NU. Policy amendments We may update this privacy policy from time-to-time by posting a new version on our website. We recommend that you check this page regularly. Continued use of this website will indicate your acceptance of any changes.

Opt outs If you opted to receive any communications from us, but have subsequently changed your mind, please contact us in writing to:

Mark Williamson, Blackfriars Wealth Management Ltd 40a London Road, Gloucester, GL1 3NU or by using the email address mark@blackfriarswm.co.uk