

# Consolidare Wealth Management Ltd

## Privacy Policy

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### 1. Aim

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Consolidare Wealth Management Ltd is committed to protecting your personal information. This policy explains what personal details we collect, what we do with that information, who we may share that information with and why, and your rights in relation to this data under the General Data Protection Regulation (GDPR).

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### 2. Why Do We Collect Your Information?

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The primary legal basis that we intend to use for the processing of your data is for the performance of our contract with you. The information that we collect about you is essential for us to be able to carry out the services that you require from us effectively. Without collecting your personal data, we would also be unable to fulfil our legal and regulatory obligations.

We would also like to send information about our services that may be of interest to you. Where you agree to receive such information, you may choose to opt out at a later date.

If you do not wish for us to collect or use your personal data, it may mean that we will be unable to fulfil our legal and regulatory obligations and provide you with our services.

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### 3. Consent

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Before gathering any personal information, we will request your explicit consent. However, where we do not achieve consent, we may still be required to process and store personal data where we have a legitimate interest in keeping details of financial advice provided to clients. For example, our regulator, the Financial Conduct Authority (FCA), asks that we keep records for a certain period of time and in some cases indefinitely.

We may receive information from one of our professional connections, such as an accountant or solicitor. In this instance, they will remain responsible for gaining your consent to sharing this personal information. However, we will request explicit consent if further data is requested.

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### 4. What Information Do We Collect From You?

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The information that we collect, and use relates to your personal and financial circumstances. It may include information classified as 'sensitive' personal information, e.g. relating to your health, marital or civil partnership status, and racial or ethnic origin. This information will only be collected and used if it is necessary for us to provide our services you have requested or to comply with our legal obligations.

We may need to gather personal information about your close family members and dependants in order to provide our service to you effectively. In such cases it will be your responsibility to ensure that you have the consent of the people concerned to pass their information on to us.

We may also collect information you provide us on other people, such as in the case of a joint applicant or a beneficiary on a product you have with us.

This may include information on children, for example, if you have requested us to recommend a policy to be taken out by yourselves on their behalf, or if they are to be named as a beneficiary on a policy. In this instance, we will only collect and use information necessary to identify the child, such as their name, age or gender.

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## **5. What Are Cookies?**

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Information relating to usage of our website is collected using cookies. These are text files placed on your computer to collect standard internet log information and visitor behaviour information. We will use your information collected from the website to personalise your repeat visits to the site.

We use cookies to track visitor use of the website and to compile statistical reports on website activity. For further information visit <http://www.allaboutcookies.org/>

You can set your browser not to accept cookies and the above website tells you how to remove cookies from your browser. However, in a few cases some of our website features may not function as a result.

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## **6. Where We Collect Your Information**

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Your information may be collected directly from you or from a variety of sources including client meetings or phone conversations with us, emails or letters sent by you to us, or an application form for a particular product or service.

Information may also be passed to us from one of our professional connections, such as an accountant or solicitor and, as previously indicated, they remain responsible for gaining your consent.

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## **7. Who We May Share Your Information With**

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In order to provide our services to you, we may be required to provide elements of your information to third parties including the following:

- Investment Companies, Product and Platform Providers with whom we will be arranging financial products for you
- A professional representative of yours, such as your accountant or solicitor
- HM Revenue and Customs, for example, in order to process tax relief on a pension contribution
- Law enforcement, credit and identity check agencies for the prevention of money laundering and other financial crime
- Our regulator, the Financial Conduct Authority
- The Financial Ombudsman
- The Central Government
- Social and Welfare Organisations
- Healthcare Professionals

We will never sell your details to someone else, share your information to anyone outside of our company for marketing purposes or use it in a way that is not for the purpose of fulfilling our advisory service, or complying with legislation.

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## **8. How We Protect Your Information**

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We take information and system security very seriously and we strive to comply with our obligations at all times. Any personal information which is 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.

All staff that handle your personal information are suitably trained and are aware of their responsibilities including the need to keep data secure, ensuring that no data is shared with any unauthorised person(s)

or organisation and reporting any concerns to the Data Protection Officer. They are trained annually, and our data protection policies are also reviewed each year.

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## **9. How Long We Keep Your Information**

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The general principle is that personal information should be retained for as long as is relevant for the purposes for which they are made, i.e. they should not need to be held by us any longer than is required for us to perform the services that you have requested us to provide on your behalf.

However, in practice, there are certain regulatory requirements that require us to hold your information for minimum time periods, and in some cases indefinitely. The length of time we keep your information for these purposes will vary depending on the obligations we need to meet.

You have the right to request the deletion of your personal data, which we will comply with subject to any regulatory restrictions.

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## **10. Your Individual Rights**

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Under the GDPR, you have several rights in relation to how we use your information:

- 1) The right to be informed - You have a right to receive clear and concise information on our purposes for processing your personal data, and why and who it will be shared with. These are contained within this Privacy Policy
- 2) The right of access – You have a right to access your personal information. Further details are provided within our Subject Access Request Policy
- 3) The right to rectification – If the data we hold about you is incorrect or incomplete, you have the right to have the data corrected. If you wish to have your information corrected, please contact us via email marking out clearly the details that need to be amended. We will usually comply with a request within 1 month. If the request is complex, we will inform you of any extension to the normal timescale that is required, the maximum extension period being 2 months
- 4) The right to restrict processing – You have the right to request the restriction or suppression of your personal data. We will still be permitted to store your personal information, but not use it for the reasons you have restricted
- 5) The right to data portability – You have the right to obtain a copy of your personal information and reuse this for your own purposes across different services
- 6) The right to object – You have the right to request us to stop processing your data where the intention is to use it for direct marketing purposes.

You may also object if the processing is for:

- A task carried out in the public interest
- In the exercise of official authority
- In relation to our legitimate interests

In some circumstances, we will continue to process the data you have objected to. This may occur when we can demonstrate compelling legitimate reasons for processing which are believed to be more important than your rights, or where the processing is required in relation to legal claims being made by, or against, us. If you wish to us to stop processing your data, or no longer wish to be contacted for marketing purposes, please contact us via email

7) The right to erasure – You have the right to be forgotten and have your personal data erased if:

- The personal data is no longer necessary for the purpose for which it was originally collected or processed
- We are relying on consent as our lawful basis for holding the data, and you withdraw your consent
- Where we are relying on legitimate interests as our basis for processing, you object to the processing of your data, and there is no overriding legitimate interest to continue
- We are processing the data for direct marketing purposes and you object to that processing
- We have processed the personal data unlawfully
- We have to do it to comply with a legal obligation
- We have obtained personal data on behalf of a child following parental consent

The right to erasure does not apply if processing is necessary for one of the following reasons:

- To exercise the right of freedom of expression and information
- For the performance of a task carried out in the public interest or in the exercise of official authority
- For archiving purposes in the public interest, scientific research historical research or statistical purposes where erasure is likely to impair the achievement of that processing
- For the establishment, exercise or defence of legal claims
- If the processing is necessary for public health purposes in the public interest
- To comply with a legal obligation

Regarding the latter; guidelines set out by our regulator, the FCA, state minimum time periods that records must be retained ranging from 3 years to indefinitely depending on the nature of the business. We may, therefore, refuse the request on those grounds. If we have disclosed the personal data to third parties, we must contact each recipient and inform them of the erasure, unless this proves impossible or involves disproportionate effort.

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## **11. How To Make a Complaint**

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If you do not believe that we have handled your personal information in line with our Privacy Policy, please contact us and we will do our utmost to resolve the matter.

If you are still unhappy, you can complain to the supervisory authority, the Information Commissioner's Office at:

In writing: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

By telephone: 0303 123 1113

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## **12. Changes To Our Policy**

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Our Privacy Policy is regularly reviewed. If there are any importance changes, we will inform you. This version of our Privacy Policy was updated in February 2019.

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## **13. How To Contact Us**

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If you have any questions regarding our Privacy Policy, please contact us

In writing: Consolidare Wealth Management Ltd, Basepoint Business Centre, Shearway Business Park, Shearway Road, Folkestone, Kent, CT19 4RH.

By telephone: 07795 565143