



## Privacy Notice

This privacy notice explains how we use any personal information we collect about you.

Prosperity Wealth are committed to protecting and respecting your privacy whilst being transparent with you regarding how we process your data. We are a “data controller” which means we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this notice. It is important that you read this notice, so you are aware of how and why we use your personal data. If you have any questions or queries, contact [matt.bell@prosperitywealth.com](mailto:matt.bell@prosperitywealth.com)

We may make changes to this notice from time to time and will notify you if any such changes are significant.

### What information do we collect about you?

We collect information about you when you engage with us for financial planning, mortgage advice, pension advice or investment management services. This information will relate to your personal and financial circumstances. It may also include special categories of personal data such as data about your health, if this is necessary for the provision of our services.

We may also collect information when you voluntarily complete client surveys or provide feedback to us.

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'll use your information collected from the website to personalise your repeat visits to the site.

### Why do we need to collect and use your personal data?

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'd also be unable to fulfil our legal and regulatory obligations.

Where special category data is required we'll obtain your explicit consent in order to collect and process this information.

### How is your information collected?

Personal information will be gathered about you and your family as part of our advisers' fact finding meeting and any other meetings with you.

Where you are referred to us by an independent introducer, they will ask for your agreement to send this information to us to provide you with advice and guidance.

We will also collect data about you and your family from other people such as providers who you hold policies with.

#### Independent Financial Advisers

2nd Floor, Quay House, Waterfront Way, Brierley Hill, DY5 1XD

Office: 01384 390039 Fax: 01384 390960 Email: [admin@prosperitywealth.com](mailto:admin@prosperitywealth.com) Web: [www.prosperitywealth.com](http://www.prosperitywealth.com)



## How will we use the information about you and on what lawful basis?

We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances, where:

- we need to perform the contract we have entered into with you.
- we need to comply with a legal obligation.
- it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- we have your consent.

Primarily, we use your data and data about your family's circumstances to provide financial advice to you and complete transactions on your behalf. We analyse and assess your data to maintain and develop our relationship with you and meet our contractual obligations to you as detailed in our client agreement.

## Who might we share your information with?

We won't share your information for marketing purposes with other companies.

In order to deliver our services to you effectively we may send your details to third parties such as those that we engage for professional compliance, accountancy or legal services as well as product and platform providers that we use to arrange financial products for you.

Where third parties are involved in processing your data we'll have a contract in place with them to ensure that the nature and purpose of the processing is clear, that they are subject to a duty of confidence in processing your data and that they'll only act in accordance with our written instructions.

We may share your information with third parties to whom we may choose to sell, transfer or merge parts of our business or our assets or who are stakeholders or investors in our business. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this notice.

Where it's necessary for your personal data to be forwarded to a third party we'll use appropriate security measures to protect your personal data in transit.

To fulfil our obligations in respect of prevention of money-laundering and other financial crime we may send your details to third party agencies for identity verification purposes.

## If you fail to provide personal information

If you fail to provide certain information when requested, we may not be able to perform the contract we have entered into with you (such as providing you with accurate financial advice), or we may be prevented from complying with our legal obligations (such as under the Money Laundering Regulations).

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## Change of purpose

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## Data security and storage

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instruction and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

## How long do we keep hold of your information?

In principle, your personal data shouldn't be held for longer than is required under the terms of our contract for services with you. However, we're subject to regulatory requirements to retain data for specified minimum periods. We also reserve the right to retain data for longer than this due to the possibility that it may be required to defend a future claim against us.

You have the right to request deletion of your personal data. We'll comply with this request, subject to the restrictions of our regulatory obligations and legitimate interests as noted above.

## How can I access the information you hold about me?

You have the right to request a copy of the information that we hold about you. If you'd like a copy of some or all of your personal information please email or write to us using the contact details noted below.

When your personal data is processed by automated means you have the right to ask us to move your personal data to another organisation for their use.

We have an obligation to ensure that your personal information is accurate and up to date. Please ask us to correct or remove any information that you think is incorrect.

## Marketing

We'd like to send you information about our products and services which may be of interest to you. If you've agreed to receive marketing information, you may opt out at a later date.

You have a right at any time to stop us from contacting you for marketing purposes. If you no longer wish to be contacted for marketing purposes, please contact us by email or post. or by clicking here.

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## Cookies

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.

## Other websites

Our website contains links to other websites. This privacy policy only applies to this website so when you link to other websites you should read their own privacy policies.

## What can you do if you are unhappy with how your personal data is processed?

You also have a right to lodge a complaint with the supervisory authority for data protection. In the UK this is:

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF  
  
0303 123 1113 (local rate)

## Changes to our privacy policy

We keep our privacy policy under regular review and we'll inform you of any changes when they occur. This privacy policy was last updated on 09/02/2023.

## How to contact us

Please contact us if you have any questions about our privacy policy or information we hold about you: by email at [Prosperity.Compliance@prosperitywealth.com](mailto:Prosperity.Compliance@prosperitywealth.com) Or write to us at:

Prosperity Wealth Ltd  
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