Privacy Notice

2018

NW BROWN
& COMPANY

NW Brown Privacy Notice

Privacy Notice

This privacy notice sets out how NW Brown Group Ltd and its subsidiary, NW Brown & Company Ltd, using the trading name NW Brown Wealth Management, ("we", "us, "our") use information that we may collect about you. We will be what's known as the 'Controller' of the personal data you provide to us.

Your Personal Data

The services we provide at NW Brown Wealth Management require us to collect personal data (for example your name, date of birth, National Insurance Number etc.) from you. Rest assured that we take your privacy seriously and have appropriate measures in place to protect it. This Privacy Notice explains when and why we collect personal information about our current and prospective clients, how we use it, the conditions under which we may disclose it to others and how we keep it secure.

What we need

We collect personal data about our current and prospective clients from your personal Fact Find and any application forms you complete for us. Depending on the service we provide, we may collect some special categories of personal data (defined as race, ethnic origin, politics, religion, trade union membership, genetics, biometrics (where used for ID purposes), health, sex life and sexual orientation). We may also ask for copies of identification documents, such as your passport or driving licence. The provision of information for marketing, such as our newsletters and invitations to client events, is voluntary and we ask for your consent to do this.

Our website uses cookies to track visitor numbers and activity. Additionally, we collect information from you when you complete one of our online enquiry forms. We will use this to keep you updated about our activities and services. You may withdraw your consent for us to store this information at any time by emailing us at dpo@nwbrown.co.uk.

Why we need it

We need your personal data in order to provide you with financial planning and investment management services in line with your client agreement, to comply with regulation and so that we can perform our contract with you. We will not collect any personal data from you that we do not need to provide and oversee our services to you. The special categories of data may be collected for regulatory reporting, insurance underwriting, general financial planning and administering your expression of wishes in respect of your pensions. Copies of your identification documents may be required to comply with our regulatory obligations.

What we do with it

All the personal data we collect is processed by our staff in the UK. The data is stored on our servers. It is encrypted. Access is restricted to those who require it. We may share your data with the following third parties:

- our IT providers and services providers in order to provide and maintain the provision of our services;

- our appointed auditors, accountants, lawyers and other professional advisers, to the extent that they require access to the information to provide advice;
- fraud prevention agencies and other organisations to allow us to undertake relevant checks;
- providers of investments or services we recommend, including providers of pensions, offshore bonds, onshore bonds, trusts, investment platforms, custodians, insurance products or other such products or services. We may also be required to share information with the auditors appointed by the providers of such products or services;
- other professional firms who provide services appropriate to your needs that we do not offer including, but not limited to, solicitors, accountants, mortgage brokers and other discretionary fund managers;
- the Financial Conduct Authority, the Information Commissioner's Office, or any relevant regulatory authority where they are entitled to require disclosure;
- if required to do so to meet applicable law, the order of a Court or market rules and codes of practice applicable to the circumstances at the time;
- relevant authorities to investigate or prevent fraud or activities believed to be illegal or otherwise in breach of applicable law;
- if tax regulations require us to collect information about tax residency, then in certain circumstances (including if we do not receive a valid self-certification from you), we may be obliged to share information about your account with the relevant tax, payments and customs authority, who may pass this on to tax authorities in other jurisdictions.

How long we keep it

We keep client personal data for a minimum of 6 years after we stop providing you with financial planning or investment management services. After this time it will be destroyed. The exception to this is Defined Benefit (final salary) pension transfers and transfers of pensions with safeguarded benefits where we are required by our regulator to keep the information indefinitely. Information we use solely for marketing purposes will be kept by us until you notify us that you no longer wish to receive this information.

What are your rights?

You have certain rights in respect of the data we hold relating to you. Details of these rights can also be found on the Information Commissioner's website (www.ico.org.uk). You are entitled to a copy of the information we hold about you in a portable format or otherwise, to request correction of inaccuracies in data, erasure, or restriction of processing of the information we hold about you, and to object to processing or to automated decision making. Please note that the application of these rights varies according to the legal basis used to process your data. In certain circumstances we are required to retain copies of information we hold about you by other regulations. In this instance we will not be able to erase or modify the data.

Who should you contact?

If you have any questions about this privacy notice or the information we hold about you please contact our Data Protection Officer, Angela Webber, at dpo@nwbrown.co.uk or by post at:

Angela Webber, NW Brown Group Ltd, Richmond House, 16-20 Regent Street, Cambridge, CB2 1DB.

If you have concerns about the way we handle your personal data and/or you think we have not dealt with data properly, you can contact the Information Commissioner's Office using the following details:

Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, SK9 5AF

Telephone: 0303 123 1113
Website: http://www.ico.org.uk/concerns