

## Privacy notice

This privacy notice relates to A&J Wealth Management Limited, trading as AFH Wealth Management Cookham, and explains how we use any personal information we collect about you.

### Your rights

You have legal rights under data protection regulation in relation to your personal data. More detail about each of these rights is set out below.

- To access personal data
- To correct/erase personal data
- To restrict how we use personal data
- To object to how we use personal data
- To ask us to transfer personal data to another organisation
- To object to automated decisions
- To understand how we protect information transferred outside Europe
- To find out more about how we use personal data

### What information do we collect about you?

We collect information about you when you engage us for financial planning/financial advice/investment management services. This information will relate to your personal and financial circumstances, including contact details, lifestyle information, employment status etc. 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. This is principally to monitor quality and assurance with the levels of service provided to you, and to monitor and review data for any complaints and for training and monitoring purposes.

### Information about connected individuals

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'll provide a copy of this privacy notice for them or, where appropriate, ask you to pass the privacy information to them.

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

- The primary legal basis that we intend to use for the collecting and 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.
- We will also collect and process data in line with our legal and regulatory requirements, such as providing information to our supervisory bodies and collecting data in line with our legal obligations for example: Anti-Money Laundering Regulations or recording telephone conversations in line with the FCA requirements.

- In some circumstances we may use legitimate interest as our legal basis for processing. Some examples of our legitimate interests are: To take action on complaints or for training and monitoring purposes and as part of client surveys to provide better services and support to our clients who have provided feedback.
- Where special category data is required, we'll obtain your explicit consent in order to collect and process this information.
- On some occasions we may need to process special category data in line with the vital interests. We will only do so if we believe this meets the criteria to cover only the interests that are essential for someone's life.

## Who might we share your information with?

**If you agree**, we may email you about other products or services that we think may be of interest to you.

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.

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. In order to enhance the security of the data during transfer we will use password protection and or/or encryption of data.

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.

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

During the course of our relationship with you we'll retain personal data which is necessary to provide services to you. We'll take all reasonable steps to keep your personal data up to date throughout our relationship.

We're also subject to regulatory requirements to retain your data for specified minimum periods. These are, generally:

- Five years for investment business
- Three years for mortgage business
- Indefinitely for pension transfers and opt-out business
- Three years for insurance business

These are **minimum** periods, during which we have a legal obligation to retain your records.

We reserve the right to retain data for longer where we believe it's in our legitimate interests to do so. In any case, we'll not keep your personal data for longer than 10 years after our relationship with you has ended.

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. You also have the right to move, copy or transfer personal data to another system.

We have an obligation to ensure that your personal information is accurate and up to date. You can ask that we rectify any information about you which is incorrect. We will be happy to rectify such information but would need to verify the accuracy of the information first. We do not use automated processing or decision-making.

### 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.

### Cookies

When you visit the AFH website we may use a short text file called a 'cookie' which is downloaded to your computer. Many websites do this, because cookies facilitate useful features such as the ability to identify whether a user has successfully logged into the site or to find out whether the computer (and probably its user) has visited the website before.

During the course of your visit, we (and our service providers) may use cookies and other technologies to automatically collect the following information:

Technical information, including your IP address, your login information, browser type and version, device identifier, location and time zone setting, browser plug-in types and versions, operating system and platform, page response times and download errors;

Information about your visit, including the websites you visit before our website and the components of our website you viewed during your visit; the number of visits, length of visits to certain pages, pages viewed, page interaction information (such as scrolling, clicks and mouseovers) and methods used to browse away from the page; and similar information for additional content that can be accessed from website pages, such as opening or printing pages or documents.

Your personal information is important to us and will be used solely by us. Under no circumstances will your personal information be sold or used by any other organisation.

If you wish to find out further information on how we process your data please go to our cookie policy [here](#).

## 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.

## Keeping your personal data secure

We have appropriate security measures in place to prevent personal data from being accidentally lost, or used or accessed in an unauthorised way. We limit access to your personal data to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

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

## How and when can you withdraw your consent?

Much of what we do with your personal information is not based on your consent, instead it is based on other legal grounds as outlined above. For processing that is based on your consent, you have the right to take back that consent for future processing of any time. You can do this by contacting us using the details above. It is important to remember, when withdrawing consent that you will not receive any marketing from us or any data may not be processed if we are using consent for the legal basis for processing. If you wish to withdraw your consent, please contact us at:

In addition, where you provided your consent, we may provide you with details of products and services of third parties where they may be of interest to you.

You can opt out of receiving marketing at any time. If you wish to amend your marketing preferences, please contact us: By phone: 01628 480 200

By email: [cookhamenquiry@afhgroup.com](mailto:cookhamenquiry@afhgroup.com)

By post: **The Carriage Barn, Bartletts Court, Littlewick Green, Maidenhead, SL6 3RX**

## Transfer of your information out of the EEA

We are based in the UK but sometimes your personal information may be transferred outside of the European Economic Area (EEA). There are certain suppliers we deal with as part of the services we offer to you which are outside the EEA. If we provide you with advice relating to such suppliers your data may be transferred outside the EEA.

Such countries do not have the same data protection laws as the United Kingdom and EEA and we will, therefore, conduct due diligence on such suppliers to ensure your privacy rights are protected.

You have a right to ask us for more information about the suppliers and safeguards we have put in place as mentioned above.

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

In the first instance, please call us to discuss any concerns. If you are not satisfied with our response, you 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

## Changes to our privacy policy

We keep our privacy policy under regular review and we will inform you of any changes when they occur. The date this privacy policy was last updated is shown in the footer.

## 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 [cookhamcompliance@afhgroup.com](mailto:cookhamcompliance@afhgroup.com)

Or write to us at **The Carriage Barn, Bartletts Court, Littlewick Green, Maidenhead, SL6 3RX**