

Privacy Statement

Your rights, your information and how we use it.

Leo Alexander Wealth and Financial Management Limited is committed to protecting yours and your family's personal information.

Our Privacy Policy contains important information about what details we collect, what we do with your information, who we share it with and your rights when it comes to the personal information you have given us. We may need to make changes to our privacy policy so please check our website updates from time to time. If there are important changes for example regarding where we process your data, then we will contact you to let you know.

Who are we.

LAWfm was established in June 2010 and provide more than the usual IFA service. This is because we are Discretionary Investment Managers and provide financial advice. We aim to provide effective investment management and financial planning on behalf of our clients and in line with their objectives and aspirations. LAWfm believes that the best growth strategy is to provide a high-level service that encourages existing clients to recommend us to their friends, colleagues and family. Our team have managed investments on a discretionary basis since 1994 and have provided comprehensive financial advice for 25 years.

LAWfm is a trading name of Leo Alexander Wealth & Financial Management Limited, which is authorised and regulated by the Financial Conduct Authority number 624042. The company is registered in England at Unit 6 Acorn Business Park Woodseats Close Sheffield S8 0TB company number 07232515.

How to contact us.

If you have any queries about the information we collect or use about you or regarding our Privacy Policy, then please contact;

The Compliance Officer, LAWfm, STEP Business Centre, Wortley Road, Deepcar, Sheffield. S36 2UHoffice@lawfm.co.uk0114 290 3697

Information we collect and use.

Information about you that we collect and use, includes but is not limited to;

- Information about who you are e.g. your name, date of birth, work status, income and expenditure and contact details.
- Information connected to your financial solutions and service with us e.g. your bank account details
- Information about your contact with us e.g. meetings, phone calls, emails and letters

- Information if you visit our office e.g. visual images collected for security purposes via closed circuit television (CCTV)
- Information classified as 'sensitive' personal information e.g. relating to your health (such as alcohol consumed smoking history and previous or existing conditions), marital or civil partnership status. This information will be collected and used where it is needed to provide advice or a product or service you have requested or to comply with our legal obligations e.g if you require a life cover policy.
- Information you may provide to us about other people e.g. joint advice and applications or beneficiaries for products we have advised on.
- Information on children e.g. where a child is a named beneficiary, or it is relevant to the advice given. We will collect and use only the information required to identity a financial need or the child such as their name and date of birth.

Personal information about others may be collected from you regarding other members of your household and family. If you give us this information then it is your responsibility to ensure and confirm that your have told the individual who Leo Alexander Wealth and Financial Management Limited is and how we use personal information, as set out in the privacy statement and that you have permission from that individual to provide their information (including sensitive personal data) to us and for us to process it, as set out in this privacy statement.

How we use your information

We may use your information to:

- Administer your policies and provide you with options regarding their upkeep
- Provide you with financial advice
- Understand your risk profile
- Handle claims
- Deal with complaints
- Reconnect with you if you move to a new house
- To review or check our understanding of your marketing preferences
- Make investment decisions on your behalf
- Assist in the formulation of business strategies e.g. through trend analysis or statistical management information
- Provide staff training e.g. through telephone recording

Where we collect your information.

We may collect your personal information directly from you or from a variety of sources including but not limited to;

- An application form for a product or service
- Phone conversations with us
- Emails and correspondence that you send to us
- A spouse/partner or other family member
- Meetings with one of our Financial Advisers or Investment Managers
- Our online services via our website
- Your Financial Adviser if you use our DFM service via a third party IFA
- Your employer if you are a member of your employer's pension scheme
- Publicly available information and sources e.g. to check your postcode or address if we have been unable to contact you
- Third party suppliers such as your custodian/platform or policy provider

What we collect and what we use your information for.

We take your privacy seriously and we will only ever collect and use information which personal to you where it is necessary, fair and lawful to do so. We will collect and use information only where:

• You have given us your permission [consent] to send information about products and service offered by Leo Alexander Wealth and Financial Management Limited.

- It is necessary to provide the advice, service and product you have requested e.g. if you have chosen to meet a Financial Advisor, we will require details to ensure our financial advice is the right solution for you such as work and salary details, expenditure and dependents.
- It is necessary for us to meet our legal or regulatory obligations e.g. to send you valuation statements, tell you about changes to Terms and Conditions or for the prevention of fraud.
- It is in the legitimate interests of Leo Alexander Wealth and Financial Management Limited e.g to deliver appropriate advice or to send you more relevant information about your financial solutions.
- It is in the legitimate interests of a third party e.g. sharing information with your product provider or custodian to ensure that they can effectively communicate with you.
- Your information may also be disclosed in good faith if Leo Alexander Wealth and Financial Management Limited feel it is required to protect the safety of our staff, the public or our property or in the event of a merger, asset sale, takeover or other related transaction

If you do not wish us to collect and use your personal information in these ways, it may mean that we will be unable to provide you with our services.

Who we may share your information with

We may share your information with third parties for the reasons outlined in 'What we collect and use your information for'. These third parties may include but are not limited to;

- Your Product Provider and/or Custodian who have been chosen to deliver your financial solutions
- Your adviser
- Your Employer
- Companies and individuals that you have chosen to support you e.g. your accountant, Power of attorney or executor
- Companies that we have chosen to support us in the delivery of our obligations to you and other customers e.g. research or technology companies
- Our regulators e.g. The Financial Conduct Authority (FCA) and The Information Commissioner's Office (ICO)
- Law enforcement agencies for the prevention and detection of crime
- HM Revenue & Customs (HMRC) e.g. for the processing of tax relief on pension payments or the prevention of tax avoidance

We will never sell your details to someone else. Where we do share your personal information, we will do so in line with obligations and keep your data safe and secure.

Where your information is processed

All of your information is processed in the UK by Leo Alexander Wealth and Financial Management Limited. Your information may be passed to a third party outside of the UK, e.g. if you have chosen an offshore financial solution and we need to send personal information to the product provider in that country. Typically, this would be a country in the European Economic Area (EEA) such as Ireland. You should carefully read the privacy notices of those companies and ensure you understand them before an application is submitted and we will tell you if your information is being passed overseas before this happens.

How we protect your information

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 and processes and we endeavor to protect your sensitive personal information when storing and transmitting information electronically.

How long we keep your information

We will keep your information only where it is necessary to provide you with our services while you are a client. We may also keep your information after this period but only where we are required to do so under our regulatory obligations. The length of time we keep your information for these purposes will vary depending on the obligations we need to meet.

Your individual rights

You have several rights in relation to how LAWfm uses your information. They are:

- You have the right to be informed about the information which we keep and use, why we keep it and who we share it with. We do this in our Privacy Statement.
- You have the right to access your data. If you wish to make a data subject access request then you can contact our Data Protection Officer via the information in the section called 'How to contact us'.
- You have the right to ensure that we correct any inaccurate or incomplete personal information that we hold about you.
- You have the right to request that we delete and remove your personal data, however if there is a compelling reason to continue to keep some of your information then we may continue to have it.
- You have the right to request the restriction or suppression of the use of your personal information in certain circumstances e.g. while we investigate or rectify your data. We are still allowed to store and keep your personal information during this time.
- You have the right to data portability which allows you to ask for a copy of your personal data to use by yourself for another purpose e.g. to furnish your accountant with relevant information when completing a tax return.
- You have the right to object to Leo Alexander Wealth and Financial Management Limited processing and using your information where it is for legitimate interests such as direct marketing (including profiling).
- You have the right to ask Leo Alexander Wealth and Financial Management Limited to give you information and request a human intervention where we use automated processes e.g. in our risk profiling analysis which is part of our process to ensure you have invested in the correct assets.

How to make a complaint.

We hope that you will never have reason to complain about our service to you. However, if something does go wrong and you believe that we have not handled your information as set out in our Privacy Statement then please bring it to our attention as soon as you can. We will try to resolve the matter fairly and quickly. You can contact our Compliance Officer through one of the following media:

In writing: The STEP Business Centre Wortley Road Deepcar Sheffield S36 2UH By phone: 0114 290 3697 By email: <u>office@lawfm.co.uk</u>

Please be assured we treat complaints seriously. For your further protection if you cannot settle your complaint with us, you may be entitled to refer it to The Information Commissioner's Office and further information can be obtained via their website, ico.org.uk/concerns.