

# Privacy Policy

## About us

Lionmede Wealth Management Ltd takes the privacy and security of your personal information very seriously. We are committed to protecting and respecting your privacy. This notice sets out the basis on which any personal information we collect from you, or that you provide to us, will be processed by us.

Lionmede Wealth Management Ltd collects, uses and is responsible for certain personal data about you. When we do so we are required to comply with data protection regulation and we are responsible as a data controller of that personal data for the purposes of those laws.

Lionmede Wealth Management Ltd is a company registered in England and Wales (company number 10462098) whose registered office is at:

Lionmede Wealth Management Ltd  
7 Whitbreads Business Centre  
Whitbreads Farm Lane  
Chatham Green  
Essex  
CM3 3FE

## Information we may collect from you

We may collect and use the following personal information about you:

### Information you give us

In the course of providing our service to you we may collect the below personal data when you provide it to us:

- contact information
- identity information
- financial information
- product details
- employment status
- lifestyle information
- health information
- data about criminal convictions or offences
- details of any vulnerability
- details of your dependents and/or beneficiaries under a policy – **If you are providing information about another person we expect you to ensure that they know you are doing so and are content with their information being provided to us. You might find it helpful to show them this privacy notice and if they have any concerns please contact us in one of the ways described below**

You will give us personal information:

- when you apply for our products and services
- when you talk to us on the phone or by other means
- when you use our websites, mobile device apps, web chat or other services
- in emails and letters
- in financial reviews and interviews
- in customer surveys
- if you take part in our competitions or promotions.

## **Information we collect about you**

When you visit our sites or use our services, we may automatically collect the following information. This includes the amount, frequency, type, location, origin and recipients:

- technical information, including information obtained via cookies, the Internet Protocol (IP) address used to connect your computer to the internet, your login information, your geographic location, browser type and version, browser plug-in types and versions, operating system and platform;

For analytics purposes we may also obtain the following information. Please note that this will not contain information that could be used to personally identify an individual:

- information about your visit, including the source of your visit, the full click path, mouse movement, through our sites (including date and time); services you viewed, searches made on our sites, page response times, download errors, length of visits to certain pages, page interaction information (such as page scrolling, mouse clicks, mouse movements and keyed text), and methods used to browse away from the page and any phone number used to call our Helpdesk. This information may be collected using a website recording service.

## **Information we collect at receipt and opening of emails.**

From time to time when you open an email sent by us we may automatically collect the following information:

- technical information, including; your geographic location, browser type and version, device type and operating system and platform
- information about how you have accessed/used the e-mail, including the full click path from within and on to our sites (including date and time), whether the email was; unsubscribed from, opened, deleted, forwarded or printed, how long the email was open.

## **Information we receive from other sources**

We may also receive personal information about you from third party service providers such as credit reference agencies, payment service providers, crime prevention agencies, government bodies or analytics providers. This information could be used as part of the service we provide to you, or as part of our regulatory or legal obligations. We may combine this information with information you give to us and information we collect about you. We may use this information and the combined information for the purposes set out in this Privacy Policy (depending on the types of information we receive).

We may receive personal information from third parties that we work with including:

- Companies that introduce you to us
- Financial advisers
- Insurers
- Comparison websites
- Fraud prevention agencies
- Credit reference agencies
- Payroll service providers (In relation to Auto-Enrolment Pension products)
- Public information sources such as Companies House
- Agents working on our behalf
- Market researchers
- Government and law enforcement agencies.

## **Special category data**

Certain types of personal data are considered more sensitive and so are subject to additional levels of protection under data protection legislation. These are known as 'special categories of data' and include data concerning your health, racial or ethnic origin, genetic data and sexual orientation. Data relating to criminal convictions or offences is also subject to additional levels of protection. We may process:

- Health information and lifestyle information when providing services in relation to a protection insurance product; and/or annuity products

In addition to the lawful basis for processing this information set out in the above table, we will be processing it either (i) for the purpose of advising on, arranging or administering an insurance contract or (ii) for the establishment, exercise or defence of legal claims.

## Using your information

Your personal information will be used for the purposes of providing financial advice and the administration and management of your investments. Under data protection law, we can only use your personal information if we have a lawful reason for doing so. A lawful reason could be when we have:

- your consent
- it is necessary to enter into or perform a contract
- it is necessary to comply with a legal obligation
- when it is in our legitimate interests.

Where we rely on our legitimate interests, we mean our:

- pursuit of our commercial activities and objectives, or those of a third party
- compliance with applicable legal and regulatory obligations and any codes of conduct
- improvement and development of our business operations and service offering, or those of a third party
- protection of our business, shareholders, employees and customers, or those of a third party.

We have set out our reasons for using your personal information in the table below under the heading Legal Basis. Where we rely on our legitimate interests, we have set out those interests in the table below.

Purpose	Legal basis
To provide you with any services and/or information you request from us (which includes carrying out any obligations arising from any contracts entered into between you and us).	To fulfil our contractual obligations.
To comply with any instructions, you give to us.	To fulfil our contractual obligations.
To notify you about changes to our service.	It is in our legitimate interests to use your personal information for this purpose.
To provide you with information by post, email, telephone or otherwise about products and services of a similar nature to those you have previously purchased or expressed an interest in which are offered by our firm and which we think may be of interest to you.	We rely on your consent to send you these communications.
To administer our sites and for internal operations, including troubleshooting, data analysis, load management, testing, research, statistical and survey purposes.	It is in our legitimate interests to use your personal information for this purpose.
To improve our sites to ensure that content is presented in the most effective manner for you and for your computer.	It is in our legitimate interests to use your personal information for this purpose.
To measure or understand the effectiveness of content we serve to you and others, and to deliver relevant content to you.	It is in our legitimate interests to use your personal information for this purpose.
For the purposes of providing services such as 'most popular' information on our site.	It is in our legitimate interests to use your personal information for this purpose.
To deliver targeted advertisements to you and others as you browse the internet, where consent has been	We rely on your consent to carry out this advertising.

given to do so.	
To obtain your feedback on a product, service or our sites via a third party appointed by us.	It is in our legitimate interests to use your personal information for this purpose.
As part of our efforts to keep our sites safe and secure and to prevent and detect money laundering, financial crime and other crime.	Comply with our legal obligations
For customer modelling, statistical and trend analysis, with the aim of developing and improving our products and services.	It is in our legitimate interests to use your personal information for this purpose.
To prevent and detect fraud, including to share your personal information with Fraud Prevention Agencies for this purpose.	It is in our legitimate interests to use your personal information for this purpose. This may in some circumstances be necessary for us to comply with our legal obligations.

## Who we share your personal information with

For the purposes set out above, we may share your information with selected third parties including:

- our suppliers and sub-contractors.
- governmental or judicial bodies or agencies such as:
  - HM Revenue & Customs
  - Financial Conduct Authority
  - UK Financial Services Compensation Scheme
  - Financial Ombudsman Service
- fraud and anti-money laundering prevention agencies, other companies and organisations to prevent or detect financial and other crime such as:
  - National Crime Agency (NCA)
  - credit reference agencies for the purpose of client banking identification such as:
  - data, service and software providers that assist us in the improvement and optimisation of our sites
  - any party linked with you or your business's product or service
  - companies we have a joint venture or agreement to co-operate with
  - organisations that introduce you to us
  - companies you ask us to share your data with.

We may also share your personal information with third parties in the following circumstances:

- if we sell or buy any business or assets, we will pass your personal information to the prospective seller or buyer of such business or assets;
- if we or substantially all of our assets are bought by a third party, personal information held by us will be one of the transferred assets; and
- if there are changes to our firm, then other parties may use your data in the same way as set out in this notice.

## Fraud Prevention Agencies (FPAs)

We may need to confirm your identity before we provide products or services to you or your business. Once you have become a customer of ours, we will also share your personal information as needed with Fraud Prevention Agencies to help detect fraud and money- laundering risks.

We will use the information to:

- Confirm identities
- Help prevent fraud and money-laundering
- Fulfil any contracts you or your business has with us.

We or an FPA may allow law enforcement agencies to access your personal information. This is to support their duty to detect, investigate, prevent and prosecute crime.

### **The information we share with the FPA**

These are some of the kinds of personal information that we share with the FPAs:

- Name
- Date of birth
- Residential address
- History of where you have lived
- Contact details, such as email addresses and phone numbers
- Financial data
- Data relating to your or your business's products or services
- Employment details, (where provided)
- Data that identifies computers or other devices you use to connect to the internet. This includes your Internet Protocol (IP) address.

We and FPAs may process your personal information in systems that look for fraud by studying patterns in the data. This might mean that we find that an account is being used in ways that fraudsters work or we may notice that an account is being used in a way that is not normal for you or your business. Either of these could indicate a possible risk of fraud or money-laundering.

### **How this can affect you**

If we or an FPA decide there is a risk of fraud, money laundering, or another aspect of financial crime, we may stop activity on the accounts or block access to them. FPAs will also keep a record of the risk that you or your business may pose.

This may result in other organisations refusing to provide you with products or services, or to employ you.

### **Data transfers out of the EEA**

FPAs may send personal information to countries outside the European Economic Area ('EEA') including the United States of America to firms that adhere to the US Privacy Shield Framework. When they do, there will be a contract in place which contains clauses that have been approved by the European Commission as adequately protecting your personal information.

### **Where do we use and store your personal information?**

We will use and store your personal information both inside and outside the European Economic Area ('EEA') including to organisations located within the United States of America that adhere to the US Privacy Shield Framework.

If we do transfer information to our agents outside of the EEA, we will make sure that it is protected in the same way as if it was being used in the EEA by using one of the following safeguards:

- Transfer it to a non-EEA country with privacy laws that have been approved as providing the same protection as countries in the EEA. Learn more on the European Commission Justice website.
- Put in place a contract with the recipient that contains clauses that have been approved by the European Commission as adequately protecting your personal information. Read more about this here on the European Commission Justice website,
- Transfer it to organisations that are part of Privacy Shield. This is a framework that sets privacy standards for data sent between the US and EU countries. It makes sure those standards are similar to what is used within the EEA. You can find out more about data protection on the European Commission Justice website.

## **If you choose not to give personal information**

We may need to collect personal information by law, or under the terms of a contract we have with you.

If you choose not to give us this personal information, it may delay or prevent us from meeting our obligations. It may also mean that we cannot perform services needed to run your accounts or policies. It could mean that we cancel a product or service you have with us.

Any data collection that is optional would be made clear at the point of collection.

## **Marketing**

We may use personal data we hold about you to provide you with details of products and services from us that may be of interest to you. We will only do so where we have obtained your consent and will do so in accordance with any marketing preferences you have provided to us.

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 change your mind you can update your choices at any time by contacting us.

## **How long we keep your personal information**

We will keep your personal information for as long as you are a client of Lionmede Wealth Management Ltd.

After you stop being a client, we may keep your data for a period of time as prescribed with the Lionmede Wealth Management Ltd Document Retention Policy years for one of these reasons in relation to any ISA, GIA, On/Offshore Bond, Mortgage, Life Insurance:

- To respond to any questions or complaints
- To show that we treated you fairly
- To maintain records according to rules that apply to us
- To comply with relevant FCA record keeping requirements

For any pension products you may hold, we are required to retain data relating to these indefinitely.

We may keep your data for longer than the period of time prescribed with the Lionmede Wealth Management Ltd Document Retention Policy if we cannot delete it for legal or regulatory reasons. If we do, we will make sure that your privacy is protected and only use it for those purposes.

## **Safeguarding your personal information**

Keeping your personal information safe is very important to us so we will take all steps necessary to ensure that your personal information is treated securely and in accordance with this Privacy Policy and applicable data protection legislation.

Once we have received your personal information, we will use strict procedures and security features to prevent unauthorised access.

## **Links to external websites**

Our sites may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. We will only ever support links to reputable companies who maintain the highest standards of data security in line with the GDPR.

If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies or how such websites collect and use your personal information. Please check these policies before you submit any personal information to these websites.

## **Social media widgets and applications**

Our sites may include functionality to enable sharing via third party social media applications, such as the Facebook Share button and Twitter widget. These social media applications may collect and use information regarding your use of our sites (see details on 'Social Sharing' cookies in our Cookie Policy).

Any personal information that you provide via such social media applications may be collected and used by that social media application and such interactions are governed by the privacy policies of the companies that provide the application. We do not have control over, or responsibility for, those companies or their use of your information.

## **Cookies, analytics and web beacons**

Our sites use cookies to distinguish you from other users. This helps us to provide you with a good experience when you browse our sites and allows us to improve our sites. For detailed information on the cookies we use and the purposes for which we use them see our cookie policy.

When we send you an email, we may track whether you have opened that email and whether you have clicked any links it may contain. This helps us measure the performance of our email campaigns. We do this by including single pixel gifs, also called web beacons, in emails we send. Web beacons allow us to collect information about when you open the email, your IP address, your browser or email client type, and other similar details.

## **Individual rights under the GDPR**

The GDPR provides the following rights for individuals:

1. The right to be informed
2. The right of access
3. The right to rectification
4. The right to erasure
5. The right to restrict processing
6. The right to data portability
7. The right to object
8. Rights in relation to automated decision making and profiling.

## **Access to your information**

You have the right to request a copy of the personal information we hold about you, subject to certain exemptions.

If you would like a copy of some, or all, of this information you may contact us using the details below

We will NOT charge a fee for providing you with this information.

## **Letting us know if your personal information is incorrect**

If any of the information we hold about you is inaccurate or incomplete, you can ask us to make any necessary amendments to your data. Please contact us if you want to do this using the details below. If you do, we will take reasonable steps to check its accuracy and correct it.

## **What if you want us to stop using your personal information?**

You have the right in certain circumstances to object to our use of your personal information, or to ask us to

delete your personal information or ask us to suspend our use of your personal information.

There may be legal or other official reasons why we need to keep or use your personal information. But please tell us if you think that we should not be using it and we will consider this.

If you want to object to how we use your data, or ask us to delete it or restrict how we use it or, please contact us using the details below.

### **What if I want to move my personal information to a different provider?**

You have the right to obtain your personal information in a structured, commonly used and machine-readable format and for it to be transferred to another organisation, where it is technically feasible.

This right only applies where the use of your personal information is based on your consent or for the performance of a contract, and when the use of your personal information is carried out by automated (i.e. electronic means).

### **How to withdraw your consent**

You can withdraw any consent you have given us at any time. Please contact us if you want to do so.

If you withdraw your consent, we may not be able to provide certain products or services to you. If this is so, we will tell you.

### **What if I have a complaint?**

You have the right to complaint to the Information Commissioner's Office where you think we have not used your personal information in accordance with data protection law. Details of how to do this can be found on [www.ico.org.uk](http://www.ico.org.uk)

### **Changes to our Privacy Policy**

We reserve the right to revise or supplement this Privacy Policy from time to time. We will place updates on our sites, inform you of the updates and where appropriate we will give you reasonable notice of any changes.

### **Contact us**

If you have any queries regarding privacy issues, you can email [team@lionmede.co.uk](mailto:team@lionmede.co.uk) or write to us at:

The Data Protection Officer  
Lionmede Wealth Management Ltd  
7 Whitbreads Business Centre  
Whitbreads Farm Lane  
Chatham Green  
Essex  
CM3 3FE

Alternatively, you can call us on 0203 6386 698