



Walden Capital

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Walden Capital

Privacy notice

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Why you should read this document

During the course of dealing with Walden Capital we will ask you to provide us with detailed personal information relating to your existing circumstances, your financial situation and, in some cases, yours and your family health history (your personal data). This document is important as it allows us to explain to you how we will process and use your personal data, and the various rights and remedies you have in relation to your personal data.

What we mean by 'your personal data'

Your personal data means any information that describes or relates to your personal circumstances. Your personal data may identify you directly, for example your name, address, date of birth or National Insurance number. Your personal data may also identify you indirectly, for example, your employment situation, your physical and mental health history, or any information that could be associated with your cultural or social identity.

In the context of providing you with assistance in relation to your investment/mortgage/finance and/or insurance requirements, your personal data may include:

- Title, names, date of birth, gender, nationality, civil/marital status, contact details, addresses and documents that are necessary to verify your identity,
- employment and remuneration information (including salary/bonus schemes/overtime/sick pay/other benefits), employment history,
- bank account details, tax information, loans and credit commitments, personal credit history, sources of income and expenditure, family circumstances and details of dependents,
- health status and history, details of treatment and prognosis, medical reports (further details are provided below specifically with regard to the processing we may undertake in relation to this type of information),
- any pre-existing investment/mortgage/finance and/or insurance products and the terms and conditions relating to these.

The basis upon which Walden Capital will store and process your personal data

When we speak with you about your investment/mortgage/finance and/or insurance requirements we do so on the basis that both parties are entering a contract for the supply of services.

In order to perform this contract, and to arrange the products and deliver the services you require, we have the right to store and process your personal data for the purposes detailed in this document. Alternatively, either in the course of initial discussions with you or when the contract between us has come to an end for whatever reason, we have the right to store and process your personal data provided it is in our legitimate business interest to do so and your rights are not affected. For example, we may need to respond to requests from mortgage lenders, insurance providers and our compliance service or make contact with you in relation to advice we have provided to you.

On occasion, we will use your personal data for contractual responsibilities we may owe our regulator, the Financial Conduct Authority, or for wider compliance with any legal or regulatory obligation to which we might be subject. In such circumstances we would be processing your personal data in order to meet a legal, compliance or other regulatory obligation to which we are subject.

The basis upon which we will process certain parts of your personal data

Where you ask us to assist you with for example, your insurance needs, in particular life insurance and insurance that may assist you in the event of an accident or illness, we will ask you information about your health and medical history (your special data). We will record and use your special data in order to make enquiries of insurance providers in relation to insurance products that may meet your needs and to provide you with advice regarding the suitability of any product that may be available to you.

If you have parental responsibility for children under the age of 13, it is also very likely that we will record information on our systems that relates to those children, and potentially to their special data.

How we collect your personal data

We will collect and record your personal data from a variety of sources, but mainly directly from you. You will usually provide information during the course of our initial meetings or conversations with you to establish your circumstances, needs and preferences in relation to investment/mortgage/finance and/or insurance. You will provide information to us verbally and in writing, including email.

We may also obtain some information from third parties, for example, credit checks, information from your employer, and searches of information in the public domain such as the electoral roll. We use technology solutions to assist in the collection of your personal data, for example software that is able to verify your credit status. We will only do this if we have consent from you for us or our nominated processor to access your information in this manner. With regards to electronic ID checks we would not require your consent but will inform you of how such software operates and the purpose for which it is used.

What happens to your personal data when it is disclosed to us

In the course of handling your personal data, we will:

- Record and store your personal data in our paper files, mobile devices and on our computer systems (*websites, email, hard drives, and cloud facilities*) or personal mobile devices of authorised employees. This information can only be accessed by employees and consultants within Walden Capital and is allowed only when it is necessary to provide our service to you and to perform any administration tasks associated with or incidental to that service,
- Submit your personal data to investment product providers/mortgage lenders/commercial lenders and/or insurance product providers, both in paper form and online via a secure portal. The provision of this information to a third party is essential in allowing us to progress any enquiry or application made on your behalf and to deal with any additional questions or administrative issues that lenders and providers may raise,
- Use your personal data for the purposes of responding to any queries you may have in relation to any investment/mortgage/finance product or insurance policy you may take out, or to inform you of any developments in relation to those products and/or policies of which we might become aware.

Sharing your personal data

From time to time your personal data will be shared with:

- Investment providers/mortgage lenders/finance lenders and insurance providers,
- Third parties who we believe will be able to assist us with your enquiry or application, or who are able to support your needs as identified. These third parties will include but may not be limited to, our compliance advisers, product specialists, providers of legal services such as estate planners, conveyancers, surveyors and valuers (in each case where we believe this to be required due to your particular circumstances).

We maintain a list of companies that we work with and with whom we may share your data. A copy of this list can be found below:

- Bluecoat Software – for the purposes of our legacy back-office system,
- Curo Time4Advice – for the purpose of maintaining client records within our back-office system and the provision of personal financial portal services for our clients,
- FinaMetrica – for the purposes of risk assessment,
- Voyant – for the purposes of cash flow modelling,
- O&M Software – for the purpose of pension scheme analysis,
- Microsoft and Google – for the purposes of storing client data in cloud services & messaging services,
- Meta Platforms Inc – for the purposes of messaging clients or internal communications,
- Simply Biz – for the purposes of compliance advice,
- Compliance & Training Services Ltd (CATS) – for the purposes of compliance advice & audit,
- HMRC – for the purposes of tax management,
- Financial Conduct Authority (FCA) – for the purposes of governance and regulation,
- Transact (Integrated Financial Arrangements plc) – for the purposes of investment platform administration services,
- Other FCA authorised providers – if required to facilitate a service we are providing to you,
- VouchedFor.co.uk – for the purposes of introducing clients and collecting client feedback,
- Unbiased.co.uk – for the purposes of introducing new clients and tracing new client engagement,
- FE Analytics – for the purposes of investment analysis,
- iPipeline & Iress – for the purposes of obtaining illustrations and product research,
- MiCAP – for the purposes of researching tax advantaged investments,
- M247 – for the purposes of security and provision of our internet connectivity,
- The Comms Guys – for the provision of telephony services,
- Computer Dr – for the maintenance of our computer systems,
- Sourcing Brain and AIR Sourcing – to obtain mortgage quotes.

This list may change from time to time as we change providers. If you would like an updated list at any time please let us know. We will perform due diligence on any new provider to ensure that the same high standards apply to protect your personal data.

Some of these third parties may in turn share your data if required to do so for the purposes of delivering their service to you, for example some investment providers may outsource IT or administration services.

Your personal data will only be shared for the purposes set out in this customer privacy notice, i.e., to progress your investment/mortgage/finance and/or insurance enquiry and to provide you with our professional services. We will only share the information required to be shared to provide the service that we are providing to you.

Please note that this sharing of your personal data does not entitle such third parties to send you marketing or promotional messages. It is shared to ensure we can adequately fulfil our responsibilities to you, and as otherwise set out in this Customer Privacy Notice.

We do not envisage that the performance by us of our service will involve your unencrypted personal data being transferred outside of the European Economic Area.

Security and retention of your personal data

Your privacy is important to us and we will keep your personal data secure in accordance with our legal responsibilities. We will take reasonable steps to safeguard your personal data against it being accessed unlawfully or maliciously by a third party.

We also expect you to take reasonable steps to safeguard your own privacy when transferring information to us, such as not sending confidential information over unprotected email, ensuring email attachments

are password protected or encrypted and only using secure methods of postage when original documentation is being sent to us.

Your personal data will be retained by us either electronically or in paper format for a minimum of six years, or longer where we have a legal right or obligation to do so.

If there was ever a case where a breach of your personal data occurred, then we would inform you at the earliest opportunity giving you details of the data breach along with the steps we were taking to rectify the situation.

Your rights in relation to your personal data

You can:

- Request copies of your personal data that we hold,
- Ask us to further explain how we use your personal data,
- Ask us to correct, delete or require us to restrict or stop using your personal data (details as to the extent to which we can do this will be provided at the time of any such request),
- Ask us to send an electronic copy of your personal data to another organisation,
- Change the basis of any consent you may have provided regarding our ability to market to you in the future, including withdrawing such consent completely.

How to make contact with Walden Capital in relation to the use of your personal data

If you have any questions or comments about this document, or wish to make contact in order to exercise any of your rights set out within it please contact the Data Protection Officer at the following address:

**Walden Capital
The Old Gun Rooms
17 High Street
Saffron Walden
Essex, CB10 1AT**

By telephone on **01799 521017** or by email at **info@waldencapital.co.uk**

If we feel we have a legal right or obligation not to deal with your request, or to action it in different way to how you have requested we will inform you of this at the time.

If you become aware of any unauthorised disclosure of your personal data, please make us aware as soon as possible so we can investigate and fulfil our own regulatory obligations.

If you have any concerns or complaints as to how we have handled your personal data you may lodge a complaint with the UK's data protection regulator, the ICO, who can be contacted through their website at **<https://ico.org.uk/global/contact-us/>** or by writing to Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.

Marketing Consent

IMPORTANT NOTES: Marketing by our Firm

Walden Capital does not undertake first or third party product marketing. We do however provide educational information and updates about products, services, and other matters that may be of interest, including our occasional newsletter. We may also invite you to client related events which may include an element of marketing content. If you would like to receive these updates and invitations, please indicate how we may contact you by selecting Yes or No below:

	<u>Client 1:</u>	<u>Client 2:</u>
Post	<input type="checkbox"/>	<input type="checkbox"/>
Phone	<input type="checkbox"/>	<input type="checkbox"/>
SMS	<input type="checkbox"/>	<input type="checkbox"/>
Email	<input type="checkbox"/>	<input type="checkbox"/>
Instant messaging or social media*	<input type="checkbox"/>	<input type="checkbox"/>

*WhatsApp, LinkedIn or similar service

Data Subject Consent Form

I hereby grant permission to Walden Capital to store and process my personal data and special personal data for the purposes explained in this document.

Name _____ Signature _____ Date _____

Name _____ Signature _____ Date _____