



Walden Capital

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Walden Capital

Junior

Privacy notice

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WALDEN CAPITAL JUNIOR PRIVACY NOTICE

Why you should read this document

If you have been given this notice you should be between thirteen and eighteen years old. This notice explains that we have collected some of your personal data, and have permission from a responsible relative to do so.

There are several reasons why we need this information including if you have an investment in your own name, such as a junior ISA (JISA) or personal pension, or because a relative of yours has investments that we take care of and knowing about their family circumstances helps us to look after their investments more effectively.

It is important that we tell you that we are holding your information on our files. This document explains what sort of information we might hold about you and what we do to make sure that these details are kept safe, as well as explaining any rights you or your relative may have in relation to this data.

If investments are held on your behalf, whilst you remain under the age of 18 you may have very little to do with your investments as a relative may be taking care of these for you. If there is anything within this document that you do not understand then please ask the person/relative who looks after your investments to explain it to you.

We may collect detailed personal information relating to your circumstances, your financial situation and, in some cases, your health and family health history and this is called 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, National Insurance number. Your personal data may also identify you indirectly, for example, your employment situation, your physical and mental health history, or any other information that could be associated with your cultural or social identity.

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

When we speak with your relative about your or their investment 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 you require, we have the right to use your personal data for the purposes detailed below.

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 retain and use 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 investment providers or our compliance service providers relating to the advice we have given to your relative.

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

There may be rare circumstances where we may ask you or your relative to provide information about your health or medical history, if we are being requested to assist with arranging insurance for example. This is known as your 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 your relative.

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 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 or your relative's behalf and to deal with any additional questions or administrative issues that providers may raise,
- Use your personal data for the purposes of responding to any queries you or your relative may have in relation to any investment or insurance policy taken out on your behalf, or to inform you or your relative 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 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 (in each case where we believe this to be required due to your specific 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 your relative 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 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 or your relative.

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 within this document.

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.

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. This obligation may change when you reach 18 years old.

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

Your rights in relation to your personal data

On your behalf, your relative 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.

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

Your relative will have been provided with our contact details in order to make contact with us if they have any concerns or wish to discuss any element of our handling of your personal data. Please speak to your relative if you have any concerns and ask them to raise those concerns with us.