

## Privacy Notice

This Privacy Notice is for all clients and prospective clients of WBR Group Limited and all its subsidiaries. This details how we will collect and process the personal data that we hold about you and your rights under UK Data Protection legislation and regulation in respect of the data held.

The WBR Group companies and trading entities will be referred to as “we” or “our” in this notice.

WBR Group Limited will be the Data Controller as defined under UK Data Protection legislation and regulations.

Our contact details are:

Data Protection Officer  
WBR Group Limited  
5A Dominus Way  
Meridian Business Park  
Leicester LE19 1RP

Tel: 0333 320 9230

Website: [wbrgroup.co.uk](http://wbrgroup.co.uk)

### What is personal data?

Personal data is any data that can be used to identify you.

### What personal data do we collect, how and when?

We will collect personal data from you at the outset of your relationship with us, from your application or from information you share as part of the initial meetings. We may also collect information from other third parties such as your financial adviser or accountant and any providers that are transferring money or assets to your scheme on your instruction. We will also collect personal data from you and other third parties instructed on your behalf throughout the course of your relationship with us as part of normal day to day activities. This could include during face to face or online meetings, by letter, email, telephone, online platforms, social media, or third-party links.

This personal data could include:

- Contact information such as name and address, country of residence, telephone numbers and email addresses;
- Information and correspondence from your contact with us, voice recordings from telephone calls, letters and emails;
- Socio-demographic information; date of birth (age), marital status, employment details, profession, gender, nationality and citizenship;
- Details of other people such as joint applicants, next of kin, power of attorney, children, or beneficiaries;
- Transactional information; account transactions, access to our online client portals;

- Financial Details such as bankruptcy, tax status, earnings, unique tax reference number, sources of wealth, sources of funds;
- Legal; national identifiers, wills, national insurance number, copy documents relating to your identity, including photographic identification, such as birth certificate, passport, proof of address documents, marriage certificates, information from fraud agencies, credit reference agencies, electoral roll and other publicly available information;
- Images of you collected by photography or CCTV should you visit our offices or attend our events;
- Information collected automatically via cookies when you visit one of our websites or use one of our online platforms. See separate Website Privacy Notice on our website for additional information; and
- Special category data if necessary, such as information relating to your health, such as medical conditions and disabilities, criminal data, information you provide if you are vulnerable, or where we suspect you may be vulnerable.

## Why do we need to collect personal data?

We process your personal data for the following purposes:

- To provide the services set out in our agreement with you;
- To carry out your instructions and manage your accounts and investments;
- To meet our legal and regulatory obligations;
- To send you updates, newsletters, and marketing communications (with your consent);
- To improve our services and customer experience; and
- To prevent fraud and ensure the security of your data and accounts.

We will only process your personal data where we have a legal basis for doing so. This includes:

- Where you have provided positive consent to us;
- Where processing is necessary for the performance of a contract between you and us or to take steps to enter into a contract; or
- Where processing is necessary for compliance with a legal or regulatory obligation.

There may also be occasions, for example with fraud prevention, where we rely upon a legitimate interest basis upon which the data may be processed. A decision to process data on the basis of legitimate interest will be made on a case by case basis, only where necessary, and in line with the guidance set out in UK Data Protection legislation. We will not process data on a legitimate interest basis where you would not normally expect the data to be processed, or if it may cause you harm. In these circumstances, your legitimate interests will override ours.

There may also be specific circumstances where we process data where we rely upon a substantial public interest basis – see special category data below.

The primary legal basis that we intend to use for the processing of your data is for the performance of our services agreement 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 may also use your information to verify your identity, improve our services or prevent and detect crime, fraud, or corruption. Without collecting your personal data, we would also be unable to fulfil our legal and regulatory obligations.

Where we process information on the basis of your consent, you have the right to contact us at any time to withdraw that consent.

Where special category data is processed, we will either obtain your explicit consent to collect and process this information, or where that is not relevant or obtaining consent is either not possible or unreasonable, we will rely on a substantial public interest basis, either support for individuals with a particular disability or medical condition, safeguarding of economic well-being of certain individuals, or suspicion of terrorist financing or money laundering. We will only collect and use special category data where we are required to do so by law, regulatory requirement, professional governing bodies, or it is required to enable us to fulfil our contract with you or your employer.

### Who will we share data with?

We may share your personal data to others, including third parties which provide services we need to use in connection with the services we carry out for you, and other entities within the WBR Group.

These third parties include:

- claimants, beneficiaries, assignees and payees;
- pension schemes and providers with which the person whose personal information we are processing has an association;
- HM Revenue and Customs;
- your professional advisers, such as Financial Advisers, Legal Advisers, Accountants;
- investment providers you or your advisers have indicated you wish to use;
- other organisations you ask us to share information with;
- our regulators, auditors, legal advisors, consultants, and relevant ombudsmen;
- pension trustees where you are using our SSAS services;
- healthcare, social and welfare organisations;
- central and local government where required to do so by applicable law and regulation;
- service providers and suppliers we have engaged to support us in the delivery of our service to you, such as banks, IT providers, consultants, credit reference agency, identity verification service providers;
- any personal representatives you appoint;

- current, past, or prospective employers;
- market research companies solely for the purpose of improving our services; and
- any other third party permitted by law and in the following circumstances:
  - To protect the security of our business;
  - To comply with court orders;
  - If we sell, merge, restructure, or otherwise reorganise our business.

We may need to disclose sensitive personal data about you to third parties, such as information relating to your health where required to do so to give effect to an instruction from you or your Financial Adviser in respect of your account.

Where we share data with a credit reference agency or identity verification service provider, the service will check your details against various databases to confirm your identity and address. A non-credit footprint will be left on your credit history. This means you will be able to see a check has been carried out, but other credit reference agencies will not.

If we wish to pass your personal data on to a third party for any purpose other than those stated in this notice, we will only do so once we have obtained your consent unless we are legally required to do so.

### Sharing your data outside the UK

Your personal data will not be transferred outside of the UK unless the destination country has an adequate level of protection equivalent to that in the UK, or appropriate safeguards in contractual agreements that the third party will give your information the same level of protection it has in the UK.

Where adequate safeguards cannot be put in place, your information will only be transferred outside the UK where:

- You have given explicit consent to do so after having been informed of the potential risks;
- The transfer is required for the performance of a contract with us, for example, you decide you to invest in an investment that is managed or based outside the UK.

### Securing your data

We have implemented appropriate technical and organisational measures to protect your personal data from unauthorised access, disclosure, alteration, and destruction.

### How long do we keep your data for?

We will retain your personal information for as long as is necessary to carry out our contracted service to you and to perform our statutory and legal obligations. In some instances, legislation and regulations set the length of time information must be kept. In other situations, we will use our discretion to ensure that we do not keep information longer than we need to.

Generally, we will retain your information for a period of six to seven years following the termination of the contractual relationship with us. There may be exceptions to this, such as where we need to keep records in respect of legal proceedings, a criminal investigation, where legislation requires us to keep information for longer, or where it is impractical to separate your data from that of someone else for whom we are still required to hold their information.

Where the last point applies, we will not attempt to use your data in any way, we will not give any other organisation access to your information, we will continue to have appropriate technical and organisational security in place to protect your information, and we will delete your information when we are able to do so.

## Your Rights

UK Data Protection legislation and regulations set out a number of rights individuals have over their data.

- The right to be informed – you have the right to be informed about what data will be used, when and how it will be used. That is the purpose of this privacy notice;
- The right of access – you may request we provide you with a copy of the personal information we hold on you;
- The right to rectification – if your data is inaccurate, you may request it be corrected. We may seek to verify the accuracy of the personal information before updating it;
- The right to erasure – you may request your data be erased where:
  - it is no longer required for its original purpose;
  - you have withdrawn consent (where we had relied on consent as the legal basis for processing), or
  - your information has been processed unlawfully;unless:
  - we have legal obligations to comply with; or
  - the information may be required to establish, exercise or defend a legal claim;
- The right to restrict processing – you can request restriction or suppression of your data where:
  - You have asked for data rectification, and we are verifying the changes;
  - Your information has been processed unlawfully;
  - Your information is no longer required for its original purpose, but we have retained your information to establish, exercise or defend a legal claim; or
  - You have objected to your personal information being used (see below) and we are considering your objection request.

Where a restriction is in place, we shall continue to store your information (up to the point we would naturally delete your information), but not use it;

- The right to data portability – you can ask for your data to be securely moved, copied, or transferred electronically to another electronic storage facility;
- The right to object – you can object to us processing your information where it is being used for direct marketing purposes. In this instance we will note your preference and suppress direct marketing. We will also consider an objection to processing your information where we have used the legitimate interests legal basis for processing; and
- Rights regarding automated decision making – we do not employ automated individual decision-making tools.

### If you wish to complain

If you wish to make a complaint about the way we handle your personal data, then please call, or write to us in the first instance. We will respond quickly with a summary guide of our complaints process and let you know the next steps we will take. Contact details for the complaints team are:

Email: [complaints@wbrgroup.co.uk](mailto:complaints@wbrgroup.co.uk)

Telephone: 03333 209 230

Postal Address: The Complaints Team, WBR SSAS, 5a Dominus Way, Leicester. LE19 1RP.

You also have the right to make a complaint direct to the Information Commissioner's Office:

Online chat: <https://ico.org.uk/make-a-complaint/>

Telephone: 0303 123 1113

Postal Address: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow. SK9 5AF.

### Changes to this privacy notice

We will keep this privacy notice under regular review (at least annually) and will place any updates on our website ([wbrgroup.co.uk](http://wbrgroup.co.uk)). Paper copies of the privacy notice are also available by contacting [marketing@wbrgroup.co.uk](mailto:marketing@wbrgroup.co.uk).

This privacy notice was last updated in October 2023.