

Manfield Wealth Management Ltd

Updated July 2024

DATA PRIVACY NOTICE

We take your privacy very seriously and we ask that you read this privacy notice carefully as it contains important information on who we are, how and why we collect, store, use and share personal data, your rights in relation to your personal data and on how to contact *us* and supervisory authorities in the event you have a complaint.

Italicised words in this privacy notice have the meaning set out in the Glossary of Terms at the end of this document.

Who we are

Manfield 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.

When we mention "Manfield", we, "us" or "our", we are referring to Manfield Wealth Management Ltd.

Manfield is a company registered in England and Wales, company number 12217582. Manfield Wealth Management Ltd. whose registered office is at; Regus House, 4 Admiral Way, Doxford International Business Park, Sunderland SR3 3XW, is authorised and regulated by the Financial Conduct Authority. Manfield Wealth Management Ltd Financial Services Register number is 923347.

We provide you with financial advice concerning investments, non-investment insurance and investment-based insurance products.

The personal data we collect and use

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

- Personal details, e.g. name, address including residency, date of birth
- Family and lifestyle details, such as plans for retirement and pension plans
- Medical details, particularly when applying for insurance products as well as existing insurance plans in place
- Employment details and associated tax
- Financial details including income and expenditure and existing savings and investments as well as other assets held such as property
- Details of any existing trusts, gifts made or intentions to make gifts
- data about any 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.**)
- existing professional associations such as solicitors or accountants should it be necessary to contact these parties in the course of providing you advice
- any other information that can be reasonably expected to be required, in order that we can carry out our role to the best of our ability, to provide you with suitable advice

Information collected from other sources

We also obtain personal data from other sources in the course of providing our *intermediary services*. Where we obtain this information from another party it is their responsibility to make sure they explain that they will be sharing personal data with *us* and, where necessary, ask permission before sharing information with *us*.

- The personal data we obtain from other sources may include the following; From product providers, such as valuations of any existing investments or details of insurance schemes
- From identification and verification checking agencies, such as to ascertain proof of identity, or address
- From HMRC to help understand your tax situation
- From your employer, should we need information concerning an employer sponsored pension scheme, or savings scheme

How we use your personal data

The below table sets out:

- how we use your personal data – you may be referred to as the ‘data subject’
- the lawful bases upon which we collect and use your personal data – we may be referred to as the ‘data controller’
- who we routinely share your personal data with

Rationale/Reason for Processing	Lawful Basis for Processing	Third party recipients linked to that activity
To set up a contract with a product provider, for an investment, or pension plan for example or an insurance plan	Performance of a contract with the data subject or to take steps to enter into a contract	Product providers
To adhere to the FCA's conduct of business rules, code of conduct and regime of treating customers fairly, as well as taxation legislation	Compliance with a legal obligation	FCA and HMRC
To help run <i>our</i> business in an efficient and profitable manner, in the interests of all associated clients in that they may benefit from <i>our</i> services in the future	Legitimate interests pursued by the controller or a third party, except where such interests are overridden by the interests, rights or freedoms of the data subject	Us and possible Paraplanning services (report writing) provided by CYA of 25 – 29 Sandy Way Yeadon East Carlton LS19 7EW
To ensure all parties to a financial contract or plan are protected and served as required under compliant and fair circumstances to their best interests	To protect the vital interests of the data subject or of another natural person or of a data subject or another individual where the data subject is physically or legally incapable of giving consent	Trustees or legal guardians of an individual, associated with them financially, or with their welfare. Office of Public Guardian
To carry our legal obligations implied on <i>us</i> , in the process of our business transactions by relevant legal and government departments	To carry out obligations under employment, social security or social protection law, or a collective agreement or where necessary for the establishment, exercise or defence of legal claims or where courts are acting in their judicial capacity	Employers, Department of Work and Pensions, Benefits Agency or in cases of criminal convictions HM Courts and Tribunals service

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 *intermediary services* in relation to a protection insurance product
- criminal conviction or offence information when providing intermediary services in relation to a general insurance product

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.

In the course of our activities relating to the prevention, detection and investigation of financial crime, we may process criminal conviction or offence information. Where we do so, in addition to the lawful basis for processing this information set out in the above table, we will be processing it for the purpose of compliance with regulatory requirements relating to unlawful acts and dishonesty

Marketing

We may use personal data we hold about you to help us identify, tailor and 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 then also have a legitimate business reason to do this 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 wish to amend your marketing preferences, please contact us:

By phone: 07738 375 448

By email: anthony@manfieldwealth.co.uk

By Post: to be provided as a business address before authorisation

In addition, you can opt out of receiving marketing at any time by clicking the 'unsubscribe' link at the bottom of our emails.

Whether information has to be provided by you, and if so why

We will tell you if providing some personal data is optional, including if we ask for your consent to process it. In all other cases you must provide your personal data in order for us to provide you with *intermediary services*.

How long your personal data will be kept

We will hold your personal data for differing periods of time depending upon the reason we have for processing it. These retention periods are set out below.

Type of Record	Retention Period
Any advice provided including details of a data subject's financial situation, our remuneration and charges. The above is subject to the rights of the data subject including the right of erasure and portability and compliance with their associated limits	Although minimum periods exist depending upon type of business transacted, we have chosen to keep all relevant information and records indefinitely. This can assist should the advice provided ever be questioned in the future.

Transfer of your information out of the EEA

We will not transfer your personal data outside of the European Economic Area or to any organisation (or subordinate bodies) governed by public international law or which is set up under any agreement between two or more countries.

You have a right to ask us for more information about the safeguards we have put in place as mentioned above. To learn more, please see 'Your rights'.

Your rights

You have legal rights under *data protection regulation* in relation to your personal data. These are set out under the below headings:

- To access personal data
- To correct / erase personal data
- To restrict how we use personal data
- To object to how we use personal data
- To ask us to transfer personal data to another organisation
- To object to automated decisions
- To find out more about how we use personal data

We may ask you for proof of identity when making a request to exercise any of these rights. We do this to ensure we only disclose information or change your details where we know we are dealing with the right individual.

We will not ask for a fee, unless we think your request is unfounded, repetitive or excessive. Where a fee is necessary, we will inform you before proceeding with your request.

We aim to respond to all valid requests within one month. It may however take us longer if the request is particularly complicated or you have made several requests. We will always let you know if we think a response will take longer than one month. To speed up our response, we may ask you to provide more detail about what you want to receive or are concerned about.

We may not always be able to fully address your request, for example if it would impact the duty of confidentiality we owe to others, or if we are otherwise legally entitled to deal with the request in a different way.

To access personal data

You can ask us to confirm whether or not we have and are using your personal data. You can also ask to get a copy of your personal data from us and for information on how we process it.

To rectify / erase personal data

You can ask that we rectify any information about you which is incorrect. We will be happy to rectify such information but would need to verify the accuracy of the information first.

You can ask that we erase your personal data if you think we no longer need to use it for the purpose we collected it from you.

You can also ask that we erase your personal data if you have either withdrawn your consent to *us* using your information (if we originally asked for your consent to use your information), or exercised your right to object to further legitimate use of your information, or where we have used it unlawfully or where we are subject to a legal obligation to erase your personal data.

We may not always be able to comply with your request, for example where we need to keep using your personal data in order to comply with *our* legal obligation or where we need to use your personal data to establish, exercise or defend legal claims.

To restrict our use of personal data

You can ask that we restrict *our* use of your personal data in certain circumstances, for example

- where you think the information is inaccurate and we need to verify it;
- where *our* use of your personal data is not lawful, but you do not want *us* to erase it;
- where the information is no longer required for the purposes for which it was collected but we need it to establish, exercise or defend legal claims; or
- where you have objected to *our* use of your personal data, but we still need to verify if we have overriding grounds to use it.

We can continue to use your personal data following a request for restriction where we have your consent to use it; or we need to use it to establish, exercise or defend legal claims, or we need to use it to protect the rights of another individual or a company.

To object to use of personal data

You can object to any use of your personal data which we have justified on the basis of our legitimate interest, if you believe your fundamental rights and freedoms to data protection outweigh *our* legitimate interest in using the information. If you raise an objection, we may continue to use the personal data if we can demonstrate that we have compelling legitimate interests to use the information.

To request a transfer of personal data

You can ask *us* to provide your personal data to you in a structured, commonly used, machine-readable format, or you can ask to have it transferred directly to another *data controller* (e.g. another company).

You may only exercise this right where we use your personal data in order to perform a contract with you, or where we asked for your consent to use your personal data. This right does not apply to any personal data which we hold or process outside automated means.

To contest decisions based on automatic decision making

If we made a decision about you based solely by automated means (i.e. with no human intervention), and the decision made by *us* produces a legal effect concerning you, or significantly affects you, you may have the right to contest that decision, express your point of view and ask for a human review. These rights do not apply where we are authorised by law to make such decisions and have adopted suitable safeguards in *our* decision-making processes to protect your rights and freedoms.

You can contact us for more information

If you are not satisfied with the level of information provided in this privacy notice, you can ask *us* about what personal data we have about you, what we use your information for, who we disclose your information to, whether we transfer it abroad, how we protect it, how long we keep it for, what rights you have, how you can make a complaint, where we got your data from and whether we have carried out any automated decision making using your personal data.

If you would like to exercise any of the above rights, please:

- email or write to our Data Protection Officer at anthony@manfieldwealth.co.uk or business address to be added prior to authorisation;
- let *us* have enough information to identify you, e.g. name, address, date of birth;
- let *us* have proof of your identity and address (a copy of your driving licence or passport and a recent utility or credit card bill); and
- let *us* know the information to which your request relates.

Keeping your personal data secure

We have appropriate security measures in place to prevent personal data from being accidentally lost, or used or accessed in an unauthorised way. We limit access to your personal data to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

Our supervisory authority

If you are not happy with the way we are handling your information, you have a right to lodge a complaint with the Information Commissioners Office. It has enforcement powers and can investigate compliance with *data protection regulation* (www.ico.org.uk).

We ask that you please attempt to resolve any issues with us before the ICO.

How to contact us

Please contact our Data Protection Officer if you have any questions about this privacy notice or the information we hold about you.

If you wish to contact our Data Protection Officer, please send an email to anthony@manfieldwealth.co.uk or write to our business address to be added prior to authorisation

Manfield Wealth Management Ltd

Regus House, 4 Admiral Way

Doxford International Business Park

Sunderland SR3 3XW

Glossary of Terms

we, us or our	Manfield Wealth Management Ltd a company registered in England and Wales 12217582 company number and having its registered office at business address to be provided before authorisation.	or insurance products
contact information	these are details that can be used to contact a person, including title, first name, surname, personal telephone number, fax, email address, home address, country, postcode or city of residence. This may also include work contact information such as work telephone number, fax, work email and work address	<ul style="list-style-type: none"> advice on other aspects of your financial circumstances as agreed, for example mitigation of inheritance tax
data controller	means a natural or legal person (such as a company) which determines the means and purposes of processing of personal data. For example, we are your data controller as we determine how we will collect personal data from you, the scope of data which will be collected, and the purposes for which it will be used in the course of us providing you with <i>intermediary services</i>	lifestyle information this includes both work and leisure behaviour patterns. Most relevant to your <i>products</i> may be your smoker status, alcohol consumption, health, retirement age and exercise habits
data protection regulation	applicable data privacy and protection laws	product this is an investment, pension, mortgage, protection and/or general insurance product in respect of which we provide <i>intermediary services</i> to you
employment status	this is information about your work, if you are employed, self-employed, unemployed, a student or on job seeker allowance	product provider a company which provides investment, pension, protection and/or general insurance products (for a list of product providers which we work with, please contact us – see <i>How to contact us</i> above)
FCA	the Financial Conduct Authority, being the independent watchdog that regulates financial services	sanction check information this is information relating to your politically exposed persons (PEPs) status and Her Majesty's Treasury financial sanctions status, which is recorded to prevent fraud and money laundering
financial information	this is information relating to your financial status, including salary/income, outgoings/expenditure, tax rate and P60	vulnerability a vulnerable consumer is someone who, due to their personal circumstances, is especially susceptible to detriment, particularly when an advisory firm is not acting with appropriate levels of care. These customers are more likely to suffer severe detriment if something goes wrong. Details of vulnerability fall into the following categories: health; resilience (financial); life events; and capability (financial knowledge/ confidence)
health information	this is information relating to your medical history, including symptoms, diagnoses, procedures and outcomes, as well as information about your height and weight. This could include previous and current or persistent medical conditions and family medical history	
identity information	this is any information that can be used to distinguish a person or verify their identity, such as name, date of birth, place of birth, gender, marital status, national identity card/number, passport, drivers licence and national insurance number	
intermediary services	these are the services we provide to you in relation to the products, which may include: <ul style="list-style-type: none"> advice on initiating and management of investment plans or pension plans, 	