DATA PROTECTION AND PRIVACY NOTICE

INTRODUCTION

Robertsons Wealth Management Ltd is committed to protecting your personal information and respecting your privacy. This Privacy Notice explains your rights together with how we gather, use and share your personal information when providing our services to you.

We rely primarily on lawful bases other than consent (such as performance of a contract or legal obligation), but we may request your consent where this is required for specific processing activities. We confirm that all such information is essential for the provision of regulated advice and satisfies the requirements of the Financial Conduct Authority.

WHO WE ARE

Robertsons Wealth Management Ltd acts as the Data Controller for the personal information you provide. We may share personal data with our authorising network, ValidPath Limited, which may act as a joint controller where required for supervision and compliance oversight.

If you have any questions about this notice or how we handle your personal information, please contact the Data Protection Officer at the address shown on our website .

WHAT PERSONAL DATA WE COLLECT AND WHY

We collect and process various personal data about you in order to:

- Provide financial advice, planning and associated services
- Carry out identity, credit, and fraud checks
- Communicate with you and maintain accurate records
- Meet our legal and regulatory obligations

HOW WE GATHER AND USE PERSONAL INFORMATION

We collect information about you, so that we can provide the financial advice and related services you require. This information may include your personal and financial circumstances.

We obtain personal information:

- Directly from you, usually in a meeting, by telephone, or by electronic communication
- From product providers (e.g. investment, pension, or insurance providers) where you have authorised data sharing
- From your professional advisers, where you have given permission
- From recorded or noted conversations and meetings to maintain an accurate record of discussions

We hold and process this information as Data Controllers in accordance with applicable data protection law in the United Kingdom (currently the Data Protection Act 2018 and the UK General Data Protection Regulation).

We use this information to:

- Analyse your current and future financial needs to provide suitable advice
- Comply with legal and regulatory obligations (e.g. Financial Conduct Authority, Anti Money Laundering, recordkeeping)
- Manage our relationship with you and maintain client records
- Support compliance monitoring, business administration, and quality assurance

We will not share your information with any other party except as indicated in this Privacy Notice or where required to do so by any statutory, governmental or regulatory body for legitimate purposes.

LEGAL BASIS FOR COLLECTING AND PROCESSING INFORMATION

Most of the personal information you provide is collected and processed so that we can deliver the financial advice and related services you request.

Some types of information require your explicit consent — for example, health data — and we will seek your consent where required. Where you have given consent, you may withdraw it at any time.

We may also process certain personal data where it is necessary for our legitimate interests in managing and developing our business, provided those interests do not override your rights and freedoms.

We are also subject to legal obligations under financial services regulation (for example, under the Financial Conduct Authority's rules) which require us to retain certain records and report information where necessary.

Where you provide information about another person (such as a spouse, partner, or child), we will only process that data where it is strictly necessary to provide the agreed advice and/or services.

SHARING AND TRANSFERRING PERSONAL INFORMATION

In the course of providing suitable financial advice, we may need to share your information with:

- Our authorising network, ValidPath Limited
- Providers of insurance, pension, annuity and investment products
- Investment platforms
- Providers of pension transfer comparison reports
- Compliance, paraplanning and administrative support services
- Legal advisers
- Providers of back-office and other financial planning software systems.

We will confirm the actual third parties with whom we will share your information when we have identified the product/service providers that we recommend you use. This will usually be done in our suitability report in which we will detail our recommendations to you.

If, in order to provide services to you, we are required to pass your personal information to parties located outside the United Kingdom or the European Economic Area (EEA), we will ensure that appropriate safeguards are in place to protect your information in accordance with applicable data protection law.

RETENTION

We retain your personal information securely for as long as necessary for the purpose of providing you with financial advice under the Terms of Business and Client Agreement (contract) or for as long as we are required to by relevant regulations.

YOUR PRIVACY RIGHTS

Under data protection law, you have the following rights:

- **Right to withdraw consent:** Where you have given us your consent to use personal information, you can withdraw your consent at any time.
- **Access to your personal information:** You can request access to a copy of your personal information. We will not normally charge for providing this information to you.
- **Portability:** You can ask us to provide you or a third party with some of the personal information that we hold about you in a commonly used electronic form.
- **Rectification:** You can ask us to change or complete any inaccurate or incomplete personal information held about you.
- **Erasure:** You can ask us to delete your personal information where it is no longer necessary for us to use it and you have withdrawn consent, or where we have no lawful basis for keeping it. Note that we might be required by regulations to retain your information even if you want it to be deleted.
- **Right to object:** You can object to our processing of your personal information.

- **Restriction:** You can ask us to restrict the personal information we use about you where you have asked for it to be erased or where you have objected to our use of it.

To exercise any of these rights, please contact our Data Protection Officer using the details shown on the first page of this document. You also have the right to complain to us, and if you remain dissatisfied, to the Information Commissioner's Office (ICO), the UK regulator for data protection, via www.ico.org.uk/global/contact-us.

INTERNET AND ELECTRONIC COMMUNICATIONS

It is now common practice to communicate and share information electronically. Internet and email communications cannot be guaranteed to be secure. While we take reasonable precautions to protect personal data, please be aware that communications sent electronically are at your own risk. We cannot accept liability for loss or damage arising from interception, corruption, or non-delivery of such communications. If you prefer not to exchange data electronically, please inform us.

SPECIAL CATEGORY PERSONAL DATA

The information you provide may include what data protection law refers to as 'special category personal data'. This may include information about your physical or mental health or condition. We will only collect and process this information where it is relevant and necessary for the services we provide to you, and only with your explicit consent. If any other type of special category data becomes relevant, we will make you aware and obtain your explicit consent before collecting or using it.

For this reason, we are asking for your consent to process special category data that is necessary to provide you with appropriate financial advice and services. By signing this consent form, you agree that we can process, both manually and by electronic means, your personal data for the purposes of providing advice, administration and management in relation to your financial affairs, now and until your consent is withdrawn.

You can withdraw your consent at any time by contacting us at the address shown on our website.