

Confidential. © Wells Gibson Limited. All rights reserved

# Privacy Policy



**Wells Gibson**  
FINANCIAL INTEGRITY

Wells Gibson Limited (Wells Gibson) is an independent financial planning company. This privacy policy explains how we use any personal information we collect about you when using the services of Wells Gibson.

We respect your right to control how your personal data is used, however, in order to offer our services, we do need to process some personal data. This privacy policy describes how we will do this. It also explains your data subject rights and our use of cookies if use our website. The policy complies with the General Data Protection Regulations (GDPR).

Wells Gibson is registered with the Information Commissioner's Office to process personal data: registration number ZA158227.

### **What information do we collect about you?**

We collect information about you once you talk to us about your personal and financial circumstances. We may also collect information about you if you voluntarily complete surveys or provide feedback, for example. If and when we use our website to collect information about you the information may be collected using cookies.

Special Category data: what is it, do we collect it, how do we use it?

It is defined as:

- personal data revealing racial or ethnic origin;
- personal data revealing political opinions;
- personal data revealing religious or philosophical beliefs;
- personal data revealing trade union membership;
- genetic data;
- biometric data (where used for identification purposes);
- data concerning health;
- data concerning a person's sex life; and
- data concerning a person's sexual orientation.

We are unlikely to need to collect any of this information other than data about your health, which we will retain because of the need to process certain types of plans. You may reveal certain other information which is irrelevant to us; in this case we will not record or retain such information, unless there is a legitimate reason to do so as part of our ongoing service mandate with you.

### **How do we use this information about you?**

We collect information about you to provide you with advice and recommendations, to periodically process your orders and to manage your account and, if you agree, to contact you about products and services we think may be of interest to you. When you provide information through our website, we use that information collected from the website to personalise your repeat visits to the website. If you have agreed, we will pass on your relevant personal information to other companies, party to transactions. We may be required to share your information with our regulators, compliance consultants, credit reference agencies and fraud prevention agencies (including for tax and anti-money laundering purposes).

### **How long will we hold the information about you?**

If we acquire information about you before we agree services, we will retain that information for a reasonable time (usually a year) in case you change your mind.

Once we have formally agreed services, we will retain your information for the duration of those services and for a period beyond that, which will broadly be in line with the period we will be legally at risk. This is usually 15 years except in specific and exceptional circumstances.

You can ask us to delete information we hold about you at any time, which we will do unless we have legal reason not to.

### **Marketing**

Wells Gibson would like to send you direct marketing communications by email, telephone or post (including electronic marketing communications to existing clients) if it is our legitimate interest to do so for marketing and business development purposes or to supply you with information regarding changes to laws and regulations.

You have the right to ask us not to process your personal information for marketing purposes. You can do this by emailing us at [integrity@wellsgibson.uk](mailto:integrity@wellsgibson.uk) or via post at the address below. You can also unsubscribe from emails by following the unsubscribe instructions in our emails.

We will not pass on your details to a third party for marketing purposes.

### **Access to your information and correction**

You have the right to request a copy of the information that we hold about you. If you would like a copy of some or all of your personal information, please email or write to us at the address below. We want to make sure that your personal information is accurate and up to date. You may ask us to correct or remove information you think is inaccurate.

### **Cookies on our Website**

Our website uses cookies for the purpose of tracking user behaviours. We do not use cookies to collect information for marketing purposes.

Cookies are text files placed on your computer to collect standard internet log information and visitor behaviour information. This information is used to track visitor use of the website and to compile statistical reports on website activity. For further information, please visit [www.aboutcookies.org](http://www.aboutcookies.org). You can set your browser not to accept cookies and the above websites tell you how to remove cookies from your browser. However, in a few cases some of our website features may not function as a result.

### **Other websites**

Our website contains links to other websites. This privacy policy only applies to our own website so when you link to other websites you should read their own privacy policies.

### **Processing of special categories of personal information**

From 25 May 2018 as a part of the changes to the General Data Protection Act we are required to seek explicit consent from you with regards to processing your personal data and that of others when it concerns specific sensitive data such as health information, or sexual orientation or with regards to a child under 13 years old.

## Health

In order to make a suitable personal recommendation to you we will need to gather health information about you. This data may need to be shared with third parties to allow for the research and establishment of a suitable policy or annuity contract.

## Other natural persons

During the course of our discussions, you may disclose information about another natural person. In this scenario you **must** be able to confirm that you have consent to so. We may provide, where reasonable, a copy of our Privacy Notice to those individuals identified.

## Children

A key part of the wealth planning and advice process is advising families as to their finances. This often includes collecting data on dependents who may be less than 13 years of age. In this scenario consent cannot be granted without parental approval to process the personal data of a child less than 13 years of age.

## Changes to our privacy policy

We keep our privacy policy under regular review, and we will place any updates on our website. This privacy policy was last updated on 13<sup>th</sup> September 2022.

## How to contact us

Please contact us if you have any questions about our privacy policy or information, we hold about you:

By email to: [integrity@wellsgibson.uk](mailto:integrity@wellsgibson.uk)

By post to: Wells Gibson Limited  
Prospect House, Prospect Business Centre  
Gemini Crescent  
Dundee  
DD2 1TY