Wells Gibson.

Your Wealth, Your Life, Your Legacy.

CLIENT INFORMATION

Privacy *Policy*

DOCUMENT	LAST UPDATED
Privacy Policy	October 2026

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 you use our website. The policy complies with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

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

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01 What information do we collect about you?

We collect information about you when you speak with us about your personal and financial circumstances.

We may also collect information about you if you voluntarily complete surveys, provide feedback, or contact us through our website.

If and when we use our website to collect information about you, the information may be collected using cookies.

02 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.

03 How do we use this information about you?

We collect and process your personal information in order to:

- provide financial advice and recommendations
- arrange financial products or services on your behalf

- manage and administer your account
- comply with legal and regulatory obligations
- communicate with you about the services we provide and, if you have given your explicit consent, to contact you about products and services we think may be of interest

When you provide information through our website, we use that information to personalise your repeat visits and respond to your enquiries.

Where appropriate, we may share relevant information with third parties involved in delivering services to you. This may include:

- product providers
- compliance consultants
- regulators
- credit reference agencies
- fraud prevention agencies
- organisations involved in anti-money laundering checks

This information is only shared where necessary to provide services or meet legal obligations.

04 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.

05 Use of Artificial Intelligence (AI) and Meeting Transcription Tools

Wells Gibson may use secure artificial intelligence (AI) tools to support internal administration, including meeting-note transcription, summarising client discussions, and creating internal documents to help ensure accuracy and consistency of our records. These tools are used only for internal purposes and only where

they comply with UK GDPR requirements. Any information processed through AI systems is handled under strict confidentiality, with appropriate safeguards in place to protect your personal data.

> AI tools are not used to make decisions about you, nor do they replace the judgment of a qualified financial planner. Any recommendations or advice provided to you remain fully human-led.

Where transcription tools are used (for example, to convert meeting audio into written notes), these are processed securely, and the output is stored within our internal systems in line with our retention policy.

We will always let you know when a meeting is being recorded or transcribed using secure AI tools. If you would prefer recordings not to be used for a particular meeting, or if you would like to permanently opt out of the use of meeting recordings and AI-supported transcription altogether, please inform us at any time.

06 Data Security and Third-Party Tools

Wells Gibson uses approved third-party technology providers to securely support our meeting-note transcription and record-keeping processes. These providers apply technical and organisational measures designed to protect personal data and operate in accordance with applicable data-protection laws, including UK GDPR.

We undertake due diligence on our technology partners and seek assurance that:

- personal data is handled securely and confidentially
- data processing is limited to the services requested by Wells Gibson
- personal data is not used for independent commercial purposes
- any international transfers are subject to appropriate safeguards

07 Marketing

Wells Gibson would like to keep in touch to provide updates, invitations and information that may be relevant to you.

> We will only send you marketing communications where you have given us your explicit consent.

Your decision to receive or not receive marketing communications will not affect the service we provide to you.

You can withdraw your consent at any time by emailing integrity@wellsgibson.uk or using the unsubscribe link in our emails.

We will never pass your personal information to third parties for their own marketing purposes.

08 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.

09 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. 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.

10 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.

11 Processing of special categories of personal information

Under UK data protection law (the UK GDPR and the Data Protection Act 2018) 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.

> This consent is separate from marketing consent and does not permit marketing communications unless you have opted in to receive them on our Privacy Policy Consent and Declaration form.

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 do 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.

12 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 in October 2026.

13 How to contact us

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

> **By email to:** integrity@wellsgibson.uk
>
> **By post to:** Wells Gibson Limited, Prospect House, Prospect Business Centre, Gemini Crescent, Dundee, DD2 1TY

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Registered in Scotland No. SC521697 · Prospect House · Dundee DD2 1TY

integrity@wellsgibson.uk · 01382 722989 · wellsgibson.uk