



PROTECTING YOUR COMPANY DATA – CORPORATE PRIVACY NOTICE

This privacy notice explains how we use the information we collect about your company.

When we refer to data from your company, this includes both data about the company itself, and personal information of shareholders, employees, or any other related individuals whose data is provided to us in the course of business.

WHAT INFORMATION DO WE COLLECT ABOUT YOUR COMPANY?

We collect information about your company when you engage with us for the services provided by our firm, including services provided at both an individual level (such as key person insurance) or a firm wide level (such as Group Personal Pensions). This information will relate to both personal circumstances of individuals, and business circumstances for the company. Where it is necessary for the provision of our services, this may also include special categories of personal data such as data about health.

If you provide data for us on behalf of another party (such as an employee, another shareholder, or a subsidiary firm), please ensure you have their permission before disclosing their data to us.

We may also collect information from client surveys or any feedback provided to us.

Information relating to usage of our website is collected using cookies. These are text files placed on your computer to collect standard internet log information and visitor behaviour information. We will use your information collected from the website to personalise your repeat visits to the site. If you wish you can set your browser not to accept cookies from us. Our website contains links to other websites; however this privacy policy only applies to our website so when you link to other websites you should read their own privacy policies.

WHY DO WE NEED TO COLLECT AND USE YOUR COMPANY DATA?

The primary legal basis that we intend to use for the processing of your company data is the performance of our contract with your company. The information that we collect about your company is essential for us to be able to effectively carry out the services required from us. Without collecting your company's data, we would also be unable to fulfil our legal and regulatory obligations.

Special categories of personal data: there are certain categories of personal data that are sensitive by nature. The categories include data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, and data concerning health. Depending on the nature of the products and services that you engage us for, we may need to obtain sensitive personal data from individuals from your company, particularly in relation to health. Our policy is that should we require any special category of personal data; we will only gather this with explicit consent.

HOW WILL WE USE YOUR COMPANY INFORMATION?

We collect information about your company to provide the services for which you engage with us. It will also be used to ensure we are able to run the necessary identity checks on the firm and connected individuals to comply with our Anti-Money Laundering obligations.

WHO MIGHT WE SHARE YOUR COMPANY INFORMATION WITH?

To deliver our services effectively, we may send data to third parties such as those that we engage for professional compliance, accountancy or legal services as well as product and platform providers that we use to arrange financial products or obtain quotes.

Where third parties are involved in processing data, we will have a contract in place with them to ensure that the nature and purpose of the processing is clear, that they are subject to a duty of confidence in processing data, and that they will only act in accordance with our written instructions. Where it is necessary for personal data to be forwarded to a third party we will use appropriate security measures to protect personal data in transit, for example password protection and encryption.

To fulfil our obligations in respect of prevention of money-laundering and other financial crime we may run a soft search on Beneficial Owners and Persons of Significant control related to your company with our third-party identity verification portal. This does not affect the credit score of any individual. If you would like more information on this, please contact the firm or your individual adviser. We will not share information with any third party for their marketing purposes.

HOW IS YOUR COMPANY DATA COLLECTED

We may process different types of information from your company and collect this in a variety of ways. The exact nature of the data collected may vary based on which areas of business you are being advised on. We process this data when necessary to provide the services you have engaged us for.

We store records of emails and letters sent to us, and copies of any forms provided to 3rd parties. Phone calls and meetings, including remote meetings such as those via Microsoft Teams, may be recorded.

Generative AI may be used to assist in recording and summarising any calls and meetings. These tools help generate meeting transcripts, enhance productivity, and ensure accurate documentation. This content will be subject to the same level of confidentiality as all of our other meeting records, and will be processed in line with UK GDPR. If you do not wish for a meeting to be recorded in this way, please confirm this when arranging a meeting with us, or at the start of any meeting. This will not impact the services you are provided or have access to.

HOW LONG DO WE KEEP HOLD OF YOUR COMPANY'S INFORMATION?

In principle, personal data should not be held for longer than is required under the terms of our contract for services. However, we are subject to regulatory requirements to retain data for specified minimum periods, which may vary depending on the areas of advice provided. We also reserve the right to retain data for longer than this due to the possibility that it may be required to defend a future claim against us.

You have the right to request deletion of any data we hold relating to your company. We will comply with this request, subject to the restrictions of our regulatory obligations and legitimate interests as noted above.

HOW CAN WE ACCESS THE INFORMATION YOU HOLD ABOUT OUR COMPANY?

You have the right to request a copy of the information that we hold about your company. This also extends to individuals from your company we hold data on, such as employees or beneficial owners, who have a right to request a copy of the personal information we hold on them as individuals (but not to request data on the company as a whole, or other individuals). If someone would like a copy of some or all of their personal information held by us, please contact us using the contact details noted below.

When personal data is processed by automated means individuals have the right to ask us to move that personal data to another organisation for their use. We have an obligation to ensure that your company data is accurate and up to date. Please ask us to correct or remove any information that you think is incorrect.

SIGNING ON BEHALF OF A FIRM

We require all our agreements to be signed by an authorised signatory of the firm, unless specified otherwise. If there are other individuals who can sign on behalf of the firm, their details should be provided to us as part of our Corporate Identification and Verification Form. Where you sign on behalf of a firm, you are consenting for us to process not only your own personal data, but also your company data and data of connected individuals provided to us in the course of business or that becomes necessary for our Anti-Money Laundering requirements and identity verification. This may include but is not limited to that of the company's Beneficial Owners, Persons of Significant Control, or relevant employees (such as those being covered by a group insurance policy),

Where one or more beneficial owners are trusts or other companies, we may need to verify the identity of the controllers of those bodies, and request information confirming the specific relationship between the other entity (such as the nature of control from another firm, or the rules of a trust.)

MARKETING

We would like to send you information about our products and services which may be of interest to your company. If you have agreed to receive marketing information, you may opt out at a later date. You have a right at any time to stop us from contacting you for marketing purposes. If you no longer wish to be contacted for marketing purposes, please contact us.

WHAT CAN YOU DO IF YOU ARE UNHAPPY WITH HOW YOUR COMPANY DATA IS PROCESSED?

You can get in touch with us at the contact information below. You also have a right to lodge a complaint with the supervisory authority for data protection. In the UK this is: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF. 0303 123 1113

CHANGES TO OUR PRIVACY POLICY

We keep our privacy policy under regular review. The latest version of our privacy policy is available on our website at <https://woodwardmarkwell.co.uk/privacy-policy/> and is available via print or email on request.

HOW TO CONTACT US

Please contact us at the below address if you have any questions about our privacy policy or any information we hold about you.

By post:

Woodward Markwell Financial Advisers Ltd
2 Friars House
Falcon Street
Ipswich
IP1 1SL

By phone: 01473 408422

By email: ifa@wmfal.co.uk