

WATERFORD INVESTMENTS
PRIVACY NOTICE

This Privacy Notice explains how we collect, use, disclose, transfer and store your personal information.

We have developed this Privacy Notice because we want you to feel confident about the privacy and the security of your personal information with Waterford Investments, whose registered office is at 13 Tithebarn Street, Poulton Le Fylde, Lancashire, FY6 7BX, are committed to complying with the data protection laws in the United Kingdom, and we reference the following legislation:

- **Data Protection Act 1998**

From 25th May 2018, new data protection laws came into force in the United Kingdom, as follows:

- **General Data Protection Regulation 2018 (Regulation (EU) 2016/679)**

Hereinafter known as the “Acts”.

When we refer to “personal information” or “personal data” in this Privacy Notice, we mean information which identifies you as an individual, or is capable of doing so. In the context of this Privacy Notice, the terms “personal information” and “personal data” may be used interchangeably.

Where we rely on your consent to use your personal data, you have the right to withdraw that consent at any time.

We may hold and use data about you in your capacity as a consumer, business customer, individual, as a shareholder, or any other capacity in which you may visit our websites. Please read this Privacy Notice carefully.

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When do we collect information?

We will collect information from you when you register with us, apply to use any of our services, become our client, or contact us in person, by telephone, by e-mail or by post. We may collect information about you from fraud prevention agencies and other organisations when we undertake checks such as identification verification checks, as explained further below.

What information will we collect?

We may collect the following information:

- Your contact details, such as your name, address, telephone number and email address;
- Your date of birth, nationality, country of birth, country of residence, employment status and tax identification number (i.e. National Insurance Number);
- Passport details, driving licence and utility bills;
- Details of the services you request from us;
- Any records held by financial crime prevention agencies and on the Electoral Register;
- Details of your employment status, income and source of wealth.

In some cases, you are not obliged to provide any personal data to us, but if you have requested information or a service from us, we will not be able to provide it without certain information, such as your contact details. Before we can begin providing you with our services, we need to obtain certain information about you, so that we can verify your identity in order for us to meet our obligations under the Money Laundering, Terrorist Financing and Transfer of Funds Regulations 2017, the Criminal Justice (Proceeds of Crime) (Financial Services Businesses) and any other applicable legislation and for the purposes of crime prevention and fraud prevention. You are obliged to provide this information and if you do not provide it, we will be unable to provide you with our services.

How we will use your information

We use information held about you in the following ways:

- to process your application to use our services;
- to undertake checks such as identification verification checks;
- to comply with our obligations arising from any contracts entered into between you and us and to provide you with the information, products and services that you request from us;
- to help protect your information and prevent unauthorised access to it;
- to deal with any queries, complaints or problems reported by you;
- if required to do so by law and to the extent necessary for the proper operation of our systems, to protect us/our customers, or for the enforcement of any agreement between you and us;
- to notify you of changes to our services;
- to help improve the services we provide to you.

Unless otherwise stated in this Privacy Notice, the legal basis for our use of your personal data will be that this information is required for one or more of the legitimate interests described with the Acts.

How we protect your information

We take appropriate security measures (including physical, electronic and procedural measures) to help protect the confidentiality, integrity and availability of your personal information from unauthorised access and disclosure. For example, only authorised employees are permitted to access personal information, and they may do so only for permitted business functions. In addition, we use firewalls to help prevent unauthorised persons from gaining access to your personal information.

Despite our efforts regarding security it is important to bear in mind that the internet is not a secure means of communication. Personal information communicated through the internet may be intercepted by other people. We cannot guarantee the security of personal information sent to us through this website. You accept that you use this website at your own risk.

Disclosure of your information

We may disclose your information:

- to businesses that are legally part of the same group of companies within that business, or that become part of that group;
- to our providers, IT providers, services providers and agents in order to provide and maintain the provision of the services;
- to our appointed auditors, accountants, Compliance Officer, lawyers and other professional advisers, to the extent that they require access to the information in order to advise us;
- to fraud prevention agencies and other organisations to allow us to undertake the checks set out below. We will supply details of such agencies on request;

- to providers of investments or services we recommend, including providers of pensions, offshore bonds, onshore bonds, trusts, investment platforms, discretionary management services, mortgages, mortgage protection products, insurance products or other such products or services. We may also be required to share information with auditors appointed by the providers of such products or services;
- if required to do so by the Financial Conduct Authority, or any relevant regulatory authority where they are entitled to require disclosure;
- if required to do so to meet applicable law, the order of a Court or market rules and codes of practice applicable to the circumstances at the time;
- to investigate or prevent fraud or activities believed to be illegal or otherwise in breach of applicable law;
- if tax regulations require us to collect information about each investor's tax residency. In certain circumstances (including if we do not receive a valid self-certification from you), we may be obliged to share information about your account with the relevant tax, payments and customs authority, who may pass this on to tax authorities in other jurisdictions;
- in the event that we sell or buy any business or assets, in which case we will disclose your personal information to the prospective seller or buyer of such business or assets; or
- if any one of those companies or substantially all of its assets are acquired by a third party, in which case personal information held by it about its clients may be one of the transferred assets.

We will not lend or sell your information to third parties.

Fraud Prevention Checks

As part of our application process we will carry out automated checks using your personal data, such as your name, postal address, date of birth, telephone numbers and employment status. These checks include identification verification checks and financial crime checks and involve us obtaining information from fraud prevention agencies and any records held by financial crime prevention agencies, on the Electoral Register, Credit checks and HM Treasury Office of Financial Sanctions.

We need to carry out these checks in order to meet our obligations under the Money Laundering Regulations (and any other applicable legislation). The information obtained from these checks is used by us to determine if we can accept you as a client, whether further information is required or the application is rejected, based on factors such as whether we have been able to verify your identity.

We may make periodic searches with fraud prevention agencies during the course of our relationship with you to verify the information we hold remains correct and that there has been no change in your status (for example when you are a politically exposed person or if you have been subject to a financial sanction). We and other organisations (who may be from other countries) may use and access the information recorded by fraud prevention agencies.

To prevent or detect fraud, or to assist in verifying your identity we may make searches at fraud prevention agencies. We may also provide information to financial and other organisations involved in fraud prevention to protect ourselves and our customers from theft and/or fraud. If false or inaccurate information is provided and fraud is identified or reasonably suspected, details will be passed to fraud prevention agencies who will record this. This information may also be accessed by law enforcement agencies. This information may be used by us, other Group companies and other organisations to prevent fraud and money laundering, for example, when processing applications for services or for debt recovery.

Data retention

We are committed to only keeping your personal data for as long as we need to in order to fulfil the relevant purpose(s) it was collected for, as set out above in this notice, and for as long as we are required or permitted to keep it by law. In our case this would be indefinitely.

Where applicable, we will keep records of pension transfers, pension conversions, pension opt-outs or Free Standing Additional Voluntary Contributions indefinitely.

Children

We understand the importance of taking extra precautions to protect the privacy and safety of children using our online services. Children under the age of 16, or equivalent minimum age in the relevant jurisdiction, are not permitted to use our services, unless their parent provided verifiable consent.

If we learn that we have collected the personal information of a child under 16, or equivalent minimum age depending on jurisdiction, outside the above circumstances, we will take steps to delete the information as soon as possible. Or obtain parental/legal guardian consent if appropriate.

Your rights

You have the following rights (unless exemptions apply), which can be exercised by contacting us using the details provided below.

The right:

- To ask us not to process your personal data for marketing purposes;
- To access personal data held about you and to obtain a copy of it;
- To prevent any processing of personal data that is causing or is likely to cause unwarranted and substantial damage or distress to you or another individual;
- To request the rectification or completion of personal data which is inaccurate or incomplete;

- To restrict or object to the processing of your personal data (from 25th May 2018 onwards);
- To request its erasure under certain circumstances;
- In certain circumstances, to receive your personal data, which you have provided to us, in a structured, commonly-used and machine-readable format and the right to transmit that data to another data controller without hindrance, or to have that personal data transmitted to another data controller, where technically feasible (from 25th May 2018 onwards) (known as Data Portability);
- To be informed about any use of your personal data to make automated decisions about you, and to obtain meaningful information about the logic involved, as well as the significance and the envisaged consequences of this processing; and
- To lodge a complaint about the way in which your personal data is being used to your Data Protection Authority the Information Commissioner's Office (United Kingdom).

When you contact us to exercise any of the rights above, we may ask you to provide some additional information in order to verify your identity, such as your name, your address and proof of identity.

If you would like to lodge a complaint or exercise any of your rights set out above, you can contact us at:

E-mail: info@waterfordinvestments.co.uk

Post: United Kingdom: Data Protection Officer, Gary Roberts, 13 Tithebarn Street, Poulton Le Fylde, Lancashire. FY6 7BX

Alternatively, if you would like to contact your Data Protection Authority, please use the contact details below.

United Kingdom: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, Tel: 0303-123-1113 (local rate) or 01625-545-745 if you call from abroad.

Cookies

We do not use cookies on our website.

Changes to our Privacy Notice

We keep our Privacy Notice under regular review and we will place any updates on this webpage. This Privacy Notice was last updated 2nd August 2018, to reflect and fully comply with the GDPR 2018.

Contacting us

If you have any queries, comments or requests regarding this Notice or you would like to exercise any of your rights set out above, you can contact us at:

E-mail: info@waterfordinvestments.co.uk

Post: **Data Protection Focal Point: Gary Roberts, 13, Tithebarn Street, Poulton Le Fylde, Lancashire, FY6 7BX**