

# Our Privacy Policy



# OUR PRIVACY POLICY – YOUR RIGHTS, YOUR INFORMATION AND HOW WE USE IT

## Introduction

Our Privacy Policy contains important information about what personal details we collect, what we do with that information, who we may share it with and why, and your choices and rights when it comes to the personal information that you have given us.

## Who are we?

We are Hubwise Connect Limited (“Hubwise”)

This Privacy Policy applies to Hubwise and we are committed to protecting your personal information.

## Information we collect and use

We may collect and process the following:

- **Information about you** – for example name, age, gender, title, date of birth and nationality. We need this information to help us identify you, but also to allow us to contact you, for example, for regulatory or service reporting reasons.
- **Government Identifiers** – for example identification document information (driving licence or passport) and National Insurance number.
- **Contact information** – for example email address, residential address, postcode and phone number.
- **Online information** – for example cookies and IP address (your computer’s internet address), if you use our websites.
- **Financial or transactional information** – for example bank account details for any payments you make to us or we make to you.
- **Third party information** – where relevant, we will have information such as executor details or power of attorney connected to your investment.
- **Information on children** – for example where a child is named as a beneficiary on an investment made by a parent or guardian on their behalf. In these cases, we will collect and use only the information required to identify the child (such as their name, age, gender).

## The different ways that we collect and use information

We may use any information we obtain directly from you or your adviser for a number of reasons. Depending on which category you fit into, we have different processing activities which may be carried out by us directly or trusted third party companies that we use. We use information in the following ways for each category:

### If you are an investor on our platform:

- Processing your investment application / instruction. This is received via your Financial Adviser.
- Verifying your identity and preventing fraud.
- Fulfilling any legal or regulatory obligations.
- Completing any requests your adviser may instruct.
- Keeping you updated about your investment with regular reports.
- Maintaining a backup of the data we hold for business continuity purposes.

### If you are an adviser, wealth manager, or an employee of an existing or potential regulated user of our platform:

- Verifying your identity and preventing fraud.
- Fulfilling any legal or regulatory obligations.
- Keeping you updated with regular reports.
- Monitoring the flow of investments into different funds, so we may fulfil our reporting obligations relating to the funds you are using.
- Sending you marketing emails and contacting you by phone about our services.

### Processing activities that apply to every individual whose personal information we process:

- Recording phone calls if you call one of our recorded lines.
- Communicating with you if you are the contact of one of our existing or potential suppliers.
- Monitoring the use of our websites.



## Cookies – what are they?

The law states that we can store ‘cookies’ on your device if they are strictly necessary for the operation of this site. There are a number of different types of cookies, defined as follows:

- **Cookies** – small text files that can be used by websites to make a user’s experience more efficient.
- **Persistent cookies** – stay valid and will work until their expiry date (unless you delete them before they expire).
- **Session cookies** – expire when you close your web browser.

For all other types of cookies, we need your permission:

- **Necessary cookies** – help make a website usable by enabling basic functions like page navigation and access to secure areas of the website. The website cannot function properly without these cookies.
- **Preference cookies** – enable a website to remember information that changes the way the website behaves or looks, like your preferred language or the region that you are in.
- **Statistic cookies** – help website owners to understand how visitors interact with websites by collecting and reporting information anonymously.
- **Marketing cookies** – are used to track visitors across websites. The intention is to display ads that are relevant and engaging for the individual user and thereby more valuable for publishers and third-party advertisers.
- **Unclassified cookies** – are cookies that we are in the process of classifying, together with the providers of individual cookies.

## Cookies - when you visit our website

We display the details regarding these cookies and apart from those deemed as necessary, you may choose to accept or decline them.

When an account is opened on the platform, we store additional cookies when either you or your adviser visits the account. We store a session cookie in your browser which is part of our security system. This cookie expires once you log out or your browsing session times-out. Each time you log-in, the cookie is overwritten with new data for that particular session. This cookie is created once you log-in and is required while within our system to access any data as part of our multiple security measures.

## Cookies - where we collect your information

The personal information we collect and use will have been provided by your financial adviser on your behalf.

**Web search** – we may search for contact details over the web (e.g. when searching for Financial Advisers). In this case, we will tell you where we got your details from.

**‘Third party’ cookies** – to collect information on how visitors use our website. Our cookie policy can give you more information on this.

## What we collect and use your information for:

We take your privacy seriously and we will only ever collect and use information which is personal to you where it is necessary, fair and lawful to do so.

We will collect and use your information only where:

- You have given us your consent to send you information about products and services offered by Hubwise, which we believe may be of interest and benefit to you.
- It is necessary to provide the product or service you have requested e.g. if you wish to invest in one of our pension or savings products, we will require some personal information including your name, address, date of birth, bank account details.
- It is necessary for us to meet our legal or regulatory obligations e.g. to send you Annual Statements, tell you about changes to Terms and Conditions or for the detection and prevention of fraud.

**If you do not wish us to collect and use your personal information in these ways, it may mean that we will be unable to provide you with our services.**

## What are our legal grounds for using your personal information?

Data protection gives organisations a number of different legal conditions which allow us to process your information lawfully.

### The conditions that apply to our processing

Processing shall be lawful only if and to the extent that at least one of the following applies:

1. The data subject has *given consent* to the processing of his or her personal data for one or more specific purposes;
2. Processing is *necessary for the performance of a contract* to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract;
3. Processing is *necessary for compliance with a legal obligation* to which the controller is subject

We will only use your personal information when one or more of these conditions has been satisfied.



Below you can see how we use your information and the legal grounds for processing this:

- For the purposes of marketing; we will require your consent for this activity and that consent may be withdrawn at any time.
- For the purposes of executing transactions as instructed by your adviser; we have a contractual arrangement to process data.
- To comply with various regulatory reporting; we do so under our legal obligation to various third parties, e.g. our regulator, the Financial Conduct Authority (FCA), and HM Revenue & Customs (HMRC) for ISA registrations.

## Who do we share your personal information with?

As you would expect, our employees will access your records in order to use your information for the uses mentioned above. However, only those employees who need access to particular information are given it and we regularly check who has access to which parts of our system.

We may also share your personal information with these categories of third parties:

- Our service providers and agents e.g. transfer agents, mailing houses for printing, confidential waste disposal and IT companies who support our technology.
- Our professional advisers i.e. auditors and legal advisers.
- Identity authentication and fraud prevention agencies.
- HMRC, regulators (such as the FCA) and other authorities like the Information Commissioner's Office (ICO).
- UK Financial Services Compensation Scheme (FSCS).

## How long do we keep personal information for?

We will keep your personal information for as long as it's considered necessary for the purpose for which it was collected and to comply with our legal and regulatory requirements.

This will involve keeping your information for a reasonable period of time after your investment or your relationship with us has ended. Typically, this is 5 years after the cessation of your investment on our platform.

In the absence of specific legal, regulatory or contractual requirements, any other personal information is kept for our baseline retention period - this is 5 years after your investment has ended. In some circumstances we may retain your information for longer, for example, we are required by the FCA to keep some pension transfer information indefinitely.

## What are my rights?

Your rights are outlined below. The easiest way to exercise any of your rights would be to contact our Compliance Department at the contact details provided. We will provide a response within 30 days, if not sooner. There is normally no charge for exercising any of your rights.

### Accessing your personal information

You have the right to find out what personal information we hold about you, and how this is being used. You can ask us for copies of your personal information, either verbally or in writing.

### Correcting or adding to your personal information

If any of your details are incorrect, inaccurate or incomplete you can ask us to correct them or to add information.

### Data portability

In some circumstances you can ask us to send an electronic copy of the personal information you have provided to us, either to you or to another organisation.

### Objecting to the use of your personal information for legitimate interest

You also have the right to object to any processing done under legitimate interest. We will re-assess the balance between our interests and yours, considering your particular circumstances. If we have a compelling reason, we may still continue to use your information.

### Objecting to direct marketing

You have a specific right to object to our use of your information for direct marketing purposes, which we will always act upon.

### Objecting to solely automated decisions and/or profiling

Automated decisions are where a computer makes a decision about you without a person being involved. We do not make automated decisions about you nor do we profile you.

### Restricting the use of your personal information

If you are uncertain about the accuracy or our use of your information, you can ask us to stop using your information until your query is resolved. We will let you know the outcome before we take any further action in relation to this information.



## Right to Erasure

You can ask us to delete your personal information in some circumstances, such as if you no longer invest with us and we do not need to keep your information for legal or regulatory reasons. If we are using consent to process your information and you withdraw it, you can ask us to erase your information.

## Right to complain to the supervisory authority

You have the right to be confident that we are handling your personal information responsibly. If you are unhappy with how we are using your information, we would encourage you to contact us first, so we can have the opportunity to deal with your concerns. Our contact details are available below.

If you are subsequently unhappy with our handling of your concerns, then you have the right to complain to the UK's Information Commissioner's Office (ICO).

The ICO can be contacted via the following:

**Post:** Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

**Telephone:** 0303 123 1113

**Live Chat:** <https://ico.org.uk/global/contact-us/live-chat>

## Changes to our privacy policy

Making sure that we keep you up to date with privacy information is a continuous responsibility and we keep this policy and any notice about it, under review. We will update both this policy and any notice as changes are required, so please check our website for updates from time to time.

If there are important changes such as changes to where your personal data will be processed, we will contact you to let you know.

**This privacy policy and notice was last updated on 14th April 2020**

## Contact us

If you have any questions or comments regarding this privacy notice or policy, or if you are not happy with the way we use your information, please contact us using the details below:

**Post:** Compliance Team, Hubwise Connect Ltd, Waverley Court, Wiltell Road, Lichfield, WS14 9ET

**Email:** [connect@hubwise.co.uk](mailto:connect@hubwise.co.uk)