Bates Wealth Management Ltd GDPR, Privacy & Cookies Policy

Data protection is taken seriously at Bates Wealth Management Ltd and safeguarding the privacy of our website visitors and clients in general is very important to us. Our Privacy & Cookies Policy provides details on which any personal information we may collect from you, or you provide to us, will be processed and used by us. It is Bates Wealth Management Ltd's intention to always be transparent in providing clear and unambiguous information on who we are and what we do.

Our website

We have a website that provides the public with information on our company and what services we provide.

Bates Wealth Management Ltd is not responsible for any information provided by any other source once you leave the Bates Wealth Management Ltd site. Any links from our website to other websites are provided merely for your convenience and do not imply our endorsement of the content or the provider. If you follow a link to any of these websites, you do so at your own risk and we do not accept any responsibility or liability for the content of such websites.

By using our website or by registering for any of the products and services we offer through it, you are confirming to us that you understand and accept that your personal information may be used by us in the manner described below. We may keep details of your visits to our website including, but not limited to, traffic data, location data, web logs.

If your visit also includes your registration to one or more of our products or services, you may unsubscribe from these at any time.

Cookie Types and Details

We may obtain information about your general internet usage by using a cookie file which is stored on your browser or the hard drive of your computer. Cookies contain information that is transferred to your computer's hard drive. They help us to improve our site and to deliver a better and more personalised service. Some of the cookies we use are essential for the site to operate. The cookies we use are:

Session cookies - Session cookies only retain information about your activities during your visit to the site. Once you close the browser, the session cookies are lost and the site will not recognise you the next time you return to the site. Session cookies help websites to recognise you and remember the information provided by you as you move from one page to another within the same website. If you have to login to a website every time you open your browser and visit it - then it is using a session cookie to store your login credentials. Many websites use session cookies for essential site functions, and to make sure pages are sent to the browser as quickly and efficiently as possible.

Persistent cookies - Persistent cookies enable websites to remember your preferences and settings (i.e. login information, language selection, font size preference, etc) so that they can offer you a more personalised and convenient access the next time you visit. For security purposes, your login information is generally encrypted by the web server before it gets stored in a cookie. Persistent cookies can exist for an extended period of time until expired or until they are deleted. They enable the site to recognise you on a continuous basis. This is done by the web server planting a small text file with a unique ID tag on your computer. On subsequent visits to the site, your browser delivers this cookie over to the site, allowing the site to retrieve the matching file. If you login into a website, then shut down your computer, start it up again, and go back to the website to find you are still logged in - then it is using a persistent cookie to remember you.

Information we may collect from you

Bates Wealth Management Ltd is both a Data Controller and Data Processor of information you provide to us.

In order to provide you with specific advice and services we will ask you questions that tell us more about you, your situation, lifestyle and attitudes. This is called personal data, some of which will be classed as confidential, private and sensitive.

The GDPR says that personal data is defined as any data from which a living individual can be identified. Any provision of that type of data should be given freely for the purpose(s) it was intended.

We ask for your permissions to use your personal information to enable Bates Wealth Management Ltd and/or one of its network of Advisers to provide you with detailed advice or proposals on the financial products and services you have asked about. This is classed as legitimate interests for processing. It simply means that we require your agreement to collect and process your details in order to provide you with a service or advice. Without it we would not be able to offer such advice or service to you.

Any of the consented personal and confidential detail, which will include any sensitive information you have provided, is only collected specifically for these purposes and is processed lawfully, fairly and transparently in a way which can be scrutinised.

That consent can be revoked by you at any time but it would mean that the more detailed advice that could be provided regarding these data will no longer be available to you.

All information is held and maintained in a secure format and encrypted where required to ensure controlled security. Only the minimum of relevant and adequate personal data will be collected and access is restricted to only those personnel that need it for the provision of the advice and services.

We may collect and process the following data about you:

- Information that you provide by filling in forms on our website. This includes information provided at the time of registering to use our website, subscribing to our products and services, posting material or requesting further products and services. We may also ask you for information when you report a problem with our website.
- Information attached to your I.P. address.
- Personal details that you provide by completing in-depth information gathering, either remotely or face to face with one of our Bates Wealth Management Ltd registered and approved advisers in relation to offering you advice on financial products and services you have asked us about.
- If you contact us, we may keep securely a record of that correspondence (including email and phone conversations) including your name, address, telephone numbers, email address and other information which you supply to us.
- We may also ask you to complete, from time to time, surveys or questionnaires which you have agreed to, that we use for research purposes or to improve our relationship with our clients.

Uses made of the information

We may use information held about you in the following ways:

- To ensure that content from our website is presented in the most effective manner for you and for your computer.
- To provide you with information, products or services that you request from us or which we feel may be of interest to you, where you have consented to be contacted for such purposes. You may ask us to cancel this consent at any time and you will only then receive information specifically about your account activity with Bates Wealth Management Ltd.
- To carry out our obligations arising from any contract entered into between you and us and that may involve providing some of your information to a third party to carry out necessary background checks (including but not limited to Identity Verification / Anti Money Laundering / Fraud Prevention / Residency Confirmation).
- To provide some or all of your personal information (as required) to one or more financial products providers in order to fulfil a detailed proposal for the services you have asked Bates Wealth Management Ltd about.
- To carry out a form of profiling that gives us a clear view of your circumstances and that is part of the advice process. Where this is done, you will be shown its recommendations and will be provided with the opportunity to review and amend its output to indicate your attitude to risk.
- For training purposes, quality assurance or to record details about the products and services you ask us about.
- To satisfy and meet our legal and regulatory requirements with the FCA and ICO, or as requested by UK security services.
- To notify you about changes to our products and services or terms & conditions.

Unless prescribed by law, we will retain your details for no longer than is necessary for the purposes for which the personal information was collected or for which it is to be further processed by us.

Disclosure of your information

For your security, Bates Wealth Management Ltd have made the conscious decision to only manage, host and process personal information in the UK.

We may disclose your personal information to any member of the Bates Wealth Management Ltd group of companies in order to fulfil any obligations to you.

Any transferring, sharing or use of personal data will only be done with approved and contracted third party companies, that have provided evidence of their own GDPR compliance, to develop the advice requested by you with the exception of checks such as Anti-Money Laundering, Fraud Prevention and Identity Validation or from valid requests by regulatory or security bodies.

We may disclose your personal information to third parties if we are under a duty to disclose or share it in order to comply with any legal or regulatory obligation, or in order to enforce or apply our terms and conditions and other agreements; or to protect the rights, property, or safety of our customers, or others.

Your rights and how to contact us

You have a right of access to personal information which we may hold about you, to have inaccurate information about you corrected or to request we stop using your personal information for marketing and other purposes. You have the right to ask Bates Wealth Management Ltd to view any information we hold about you and you can expect to receive a response from Bates Wealth Management Ltd in line with the guidance laid down by the GDPR. Any requests should be either emailed to data.protection@2plan.com and marked 'Subject Access Request' or put in writing and addressed to:

The Data Protection Officer
2plan wealth management ltd
3rd floor Bridgewater Place
Water Lane
Leeds
LS11 5BZ

Contact information

We regularly review our policies, and any changes will be posted on our website. This Data Privacy & Cookies Policy was last reviewed March 2018.

If you have comments or any questions about our Data Privacy & Cookies Policy, please contact: data.protection@2plan.com

2plan wealth management - **Company registration number – 05998270, Data Protection registration number - Z9770624**

FCA registration number – 461598, VAT registration number - 894679251

For your information:

Financial Conduct Authority - Head Office: 25 The North Colonnade, London E14 5HS - (0)20 7066 1000

Information Commissioners Office - Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF - 0303 123 1113.