# DATA PROTECTION STATEMENT

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| place of birth and residential address. |  |
| Your contact details including your name, postal and email address. | * To contact you in order for us to manage, administer and provide our services to you. * To respond to any correspondence and service-related enquiries you send to us in respect of our services. * To discuss products or services for which you apply or may be interested in applying for. * To manage any applications you make for products or services. * To communicate any updates to you including any changes to our services, the terms and conditions of any services which we have provided to you, any changes to this Data Protection Statement and to our websites. * To contact you in order to receive your feedback on our services and to participate in related surveys. |
| Financial information relating to you, including pension contributions and current value, salary, bank account balances and details of investments. | * To evaluate your eligibility for products. * To enable us to advise you on your financial circumstances and the appropriateness of specific courses of action and products. * We collect and process this personal data in order to provide the services to you that you have requested and for our legitimate business interests. |
| Details of your dependents (name, date of birth and future aspirations) | * To enable us to provide you with services that you have requested that would involve, or have an impact on, your dependents (who may be adults or minors). Where those dependents are adults, please make sure that you   have their permission to provide us with their personal information. |
| Lifestyle information | * During our conversations with you about your financial aims and objectives, we are likely to discuss a variety of issues relating to your circumstances (for example your marital status, job title, investment goals and choices and your attitude to risk). * We discuss this kind of information to enable us to provide you with personalised and accurate advice and   to make recommendations that are suitable for your circumstances. |
| Details of contact that we have had with you such as referrals and quotes. | * To allow us to provide a professional service to you and to contact you with information about other services of ours that we think you may be interested in. * We collect and process this personal data for our legitimate business interests. |
| Details of services you have received. |
| Customer experience and other feedback | * To review your feedback and experience with us so that we can |

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## The purpose of this Data Protection Statement

When we provide our services to you, we will collect information about you and we want to be open and transparent with you as to the types of information we collect about you, why we collect it, how we use it and who we may share it with.

Perspective Financial Group is a leading national financial advisory group consisting of local offices, each of which is its own legal entity. The data controller of your personal data is Watson Buckle Wealth Management Limited, the Perspective Financial Group local office which provides you with financial advice. Watson Buckle Wealth Management Limited is registered at York House, Cottingley Business Park, Bradford, BD16 1PE with company number 06718582 (“we”, or “us”, or “our”).

Each local office is a subsidiary of our parent entity, Perspective Financial Group Limited. Perspective Financial Group Limited provides its local offices with support and shared back-office services and will only ever process your personal data for these purposes and in accordance with our instructions.

If you have any questions or concerns about the use of your personal data, then please contact us using the contact details provided in the 'How to contact us' section at the bottom of this Data Protection Statement.

## What type of personal data will be processed and why?

We may ask you to provide personal data by filling in hard copy forms and documents or by corresponding with us by phone, e-mail, letter or otherwise or during the course of meetings which you attend with one of our advisers.

The personal data that we ask you to provide, and the reasons why we ask you to provide it, include:

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| **Types of personal data** | **Why we collect it** |
| Identity details including your name and date of birth.  We may ask for copies of identity documents in which case we may collect details  including your | * To carry out money laundering and financial checks and for fraud and crime prevention and detection purposes. * We will only ever use copies of identity documents for this purpose. * We collect and process this personal data in order to comply with our legal and regulatory requirements. |

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| and information you provide to us. | improve our products and services for you and for our other customers.   * We collect and process this personal data for our legitimate business interests (and we record calls both for quality and training purposes and to comply with our legal and regulatory obligations).   *Please see section below entitled "When we record communications" for more information.* |
| Information about  complaints and incidents. |
| Recordings of calls we receive or make. |
| All of the personal data described above. | * We may disclose your personal data to third parties where we are required to do so to comply with applicable laws and regulatory requirements including in circumstances where we are required to do so by a Court Order, regulatory authority or any other third party with the lawful right to request and receive the personal data we hold about you (including law enforcement agencies and tax authorities). * We may also use your personal data where it is necessary for us to take legal advice in order to establish our legal rights, to bring a claim against you or any related parties or to defend a claim from you or any related parties. * We collect and process this personal data for our legitimate business interests. |

Depending upon the types of products and services you require, we may also collect “special categories of personal data” (which is also known as “sensitive personal data”) which includes information relating to your health. The special category personal data that we may ask you to provide, and the reasons why we ask you to provide it, are as follows:

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| **Types of special category**  **personal data** | **Why we collect it** |
| Information relating to your physical or mental health. | * Certain products and services that you request may require this information. Specifically, in order for us to advise you on and to submit applications for health or life insurance products or annuities and services, we will need to collect information relating to your physical and mental health in order to obtain accurate quotes and to advise on the suitability of products (as insurance premiums and eligibility for products will in part depend on your physical and mental health). We will usually collect this information in the course of meetings with you, on specific questionnaires or in the process of completing an application form for such products and services. |
| Information relating to your dependents' physical or mental  health. | * Where you are responsible for a dependent's care, assessing our advice against any financial requirements resulting from those responsibilities. |

We will only process the special category personal data listed above with your explicit consent. We ask

for your consent to the processing of this data at the end of this Data Protection Statement. You may choose not to provide us with this consent. However, **please note that if you do not provide us with your consent to collect and process the information listed in the table above:**

* **we may not be able to advise you fully in respect of certain products and services which require this information** (in particular those relating to health or life insurance or annuities)**;**

### your application may be rejected by the providers of products and services which require this information; or

* **the quotes for such products and services may be higher than would be the case if this information were provided**.

We may obtain some information about you from third party sources, but only where we have checked that these third parties are legally permitted or required to disclose your personal data to us. In particular, once you have provided your consent for us to act on your behalf, we will send a Letter of Authority signed by you to the providers with whom you hold pensions and/or investments so that we can obtain relevant details and advise you as required.

This will help us make the best possible assessment of your financial situation.

## When we record communications

We, and persons acting on our behalf, may record and/or monitor communications (including telephone conversations over landlines and mobile phones, emails, instant messaging, chat rooms, fax and other electronic communications) between our staff and you. We only record communications between us in order to comply with our legal and regulatory requirements - as a regulated financial adviser, the law requires us to record these communications.

## Who might my personal data be shared with?

We may disclose your personal data to the following categories of recipients:

* to providers of products and services in respect of whom you request us to submit applications on your behalf and to receive updates from such providers in order for us to provide our services to you throughout the lifetime of our relationship with you;
* to our **suppliers and partners** in order for them to help us provide our services to you, this includes;
  + our IT systems, back office systems and paperless office systems providers to assist us with providing you with an

efficient, modern and professional service; and

* + suppliers of regulatory compliance support services who may review our records containing your personal data in order to audit and report to us on our compliance with applicable laws and regulatory requirements.
* to **Perspective Financial Group Limited**, our parent company, which provides us with accountancy and compliance support and shared back-office services and which will only ever process your personal data for these purposes;
* to **another member of the Perspective Financial Group** where that other member is better-placed to provide you with advice (for example where that other member specialises in an area in which you are interested). We will only transfer a copy of your file to that other member with your permission;
* to a **prospective buyer** (and its agents and advisers) in the event that Perspective Financial Group Limited intends to sell any part of its business or its assets or if substantially all of its assets are acquired by a third party, in which case your personal data could form part of one of the assets sold, provided that the buyer is informed that it must use your personal data only for the purposes described in this Data Protection Statement – neither we nor Perspective Financial Group Limited will ever rent or sell your personal data other than as part of a business sale;
* to any **national and/or international regulatory, enforcement body, government agency or court** where we believe disclosure is necessary (i) as a matter of applicable law or regulation (including where we are required by law to provide information to organisations such as HMRC), (ii) to exercise, establish or defend our legal rights, or (iii) to protect your vital interests of those of any other person; and
* to any **other person with your consent** to the disclosure or where the law requires or permits us to do so.

**Legal basis for processing personal data** Our legal basis for collecting and using your personal data will depend on the personal data concerned and the specific context in which we collect it. In respect of the personal data and the purposes for which we may process your personal data which are set out in this

Data Protection Statement, we have confirmed the legal basis upon which we collect and process your personal data in the 'What type of personal data will be processed and why?' section above.

If we ask you to provide personal data to comply with a legal requirement or to perform a contract with you or with your explicit consent, we will make this clear at the relevant time and advise you whether the provision of your personal data is mandatory or not (as well as of the possible consequences if you do not provide your personal data).

Similarly, if we collect and use your personal data in reliance on our legitimate interests (or those of any third party), we will make clear to you at the relevant time what those legitimate interests are.

If you have questions about or need further information concerning the legal basis on which we collect and use your personal data, please contact us using the contact details provided under the “How to contact us” heading below.

## International Data Transfers

We will only process your personal data inside the European Economic Area.

## Your data protection rights

You have the following data protection rights:

* If you wish to **access, correct, update or request deletion** of your personal data, you can do so at any time by contacting us using the contact details provided under the *“How to contact us”* heading below.
* In addition, you can **object to processing** of your personal data, ask us to **restrict processing** of your personal data or **request portability** of your personal data. Again, you can exercise these rights by contacting us using the contact details provided under the *“How to contact us”* heading below.
* You have the right to **opt-out of marketing communications** we send you at any time. You can exercise this right by clicking on the “unsubscribe” or “opt-out” link in the marketing e-mails we send you. To opt-out of other forms of marketing (such as postal marketing or telemarketing), then please contact us using the contact details provided under the *“How to contact us”* heading below.
* Similarly, if we have collected and process your personal data with your consent, then you can **withdraw your consent** at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal data conducted in reliance on lawful processing grounds other

than consent. For specific information about our processing of your sensitive category personal data with your explicit consent, please see the *"Your consent to us processing your special category personal data"* heading below.

* You have the **right to complain to a data protection authority** about our collection and use of your personal data. For more information, please contact your local data protection authority. (Contact details for data protection authorities in the European Economic Area, Switzerland and certain non- European countries (including the US and Canada) are available at: [http://ec.europa.eu/justice/article-](http://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index_en.htm) [29/structure/data-protection-](http://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index_en.htm) [authorities/index\_en.htm.](http://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index_en.htm)

We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws.

## Data retention

We retain personal data we collect from you where we have an ongoing legitimate need to do so, for example:

* to provide you with a product or service you have requested us to provide,
* to perform our contractual obligations to you;
* to comply with applicable legal, tax or accounting requirements;
* to defend or manage any claims or complaints between us, you and any relevant third party including taking legal advice in respect of such claims in order to establish, exercise or defend our legal rights or such claims. This would include complaints and claims which you may bring against us or which are submitted to a court, regulatory authority or ombudsman.

When we have no ongoing legitimate need to process your personal data, we will either delete or anonymise it or, if this is not possible (for example, because your personal data has been stored in backup archives), then we will securely store your personal data and isolate it from any further processing until deletion is possible.

**Updates to this Data Protection Statement** We may change or update this Data Protection Statement in order to maintain our compliance with applicable law and regulation or following an update to our internal practices. When we update our Data Protection Statement, we will take appropriate measures to information you, consistent with the significance of the changes we make.

## How to contact us

If you would like to contact us in relation to this Data Protection Statement or if you have any other questions in respect of our processing of your personal data, please contact The Data Protection Officer using the contact details below or by email at [enquiries.wb@pfgl.co.uk](mailto:enquiries.wb@pfgl.co.uk)

...in writing: The Compliance Officer, Perspective (North East) Limited, Northumbria House, 21-23 Brenkley Way, Blezard Business Park, Newcastle- Upon-Tyne, NE13 6DS

## Your consent to us processing your special category personal data

As explained above, we can only process the special category personal data listed in the table on page 2 with your explicit consent. We ask for your explicit consent to the processing of this data below. You may choose not to provide us with this consent. However, **please note that if you do not provide us with your explicit consent to process the special category personal data listed above, this may affect our ability to advise you on your options and it may limit the products and services which are available to you and may result in your application being rejected or result in higher quotes being provided to you** (in particular those relating to health or life insurance or annuities).

Do you consent to us processing the special category personal data listed in the table on page 2?

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| Client 1 | | Client 2 | |
| Yes |  | Yes |  |
| No |  | No |  |

## Communications about other products or services

We would like to contact you from time to time with details of offers, products, reminders and services which may be of interest to you. Please tick the relevant boxes below if you **do not want** to receive this information from us:

Client 1 Client 2

by email  by email 

by post  by post  by text message  by text message  by telephone  by telephone 