



WAVERTON  
INVESTMENT MANAGEMENT

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## WAVERTON INVESTMENT MANAGEMENT LIMITED PRIVACY NOTICE

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Waverton Investment Management Limited, 16 Babmaes Street, London SW1Y 6AH United Kingdom

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**This Privacy Notice explains how Waverton Investment Management Limited (“the Company”) collects, uses and discloses your personal data, and your rights in relation to the personal data it holds.**

**In this Privacy Notice, “us”, “we” and “our” refers to the Company.**

**The Company is the data controller of your personal data and is subject to the Data Protection Act 1998 (“DPA”) (and, once in force, to EU Regulation 2016/679 (“GDPR”)).**

**We may amend this Privacy Notice from time to time, to reflect any changes in the way that we process your personal data. This Privacy Notice supersedes any previous version of it which you may have been provided with or had sight of before the date stated in this document as well as anything to the contrary contained in any agreement with us.**

## **YOUR RIGHTS**

Under the GDPR you have the following rights:

- to obtain access to, and copies of, the personal data that we hold about you;
- to require that we cease processing your personal data if the processing is causing you damage or distress;
- to require us not to send you marketing communications.
- to require us to correct the personal data we hold about you if it is incorrect.
- to require us to erase your personal data;
- to require us to restrict our data processing activities;
- to receive from us the personal data we hold about you which you have provided to us, in a reasonable format specified by you, including for the purpose of you transmitting that personal data to another data controller;

Please note that the above rights are not absolute, and we may be entitled to refuse requests where exceptions apply.

You can find out more about your rights under data protection legislation at [www.ico.org.uk](http://www.ico.org.uk).

If you have any questions about how we use your personal data, or you wish to exercise any of the rights set out above, please contact our compliance team using any of the following:

- By post – 16 Babmaes Street, London, SW1Y 6AH
- By email - [compliance@waverton.co.uk](mailto:compliance@waverton.co.uk)
- By telephone - +44 (0) 207 484 7484

If you are not satisfied with how we are processing your personal data, you can make a complaint to the Information Commissioner at [www.ico.org.uk](http://www.ico.org.uk).

## **HOW WE COLLECT YOUR DATA**



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We may collect your personal data in a number of ways, for example:

- from the information you provide to us when you meet with one of our employees;
- when you communicate with us by telephone, fax, email or other forms of electronic communication. In this respect, we may monitor, record and store any such communication;
- when you complete or we complete on your behalf client on-boarding, application or other forms;
- from other companies in our Group;
- from your agents, trustees, platforms, advisers, intermediaries, insurance companies, fund managers, investment managers and custodians of your assets;
- from publicly available sources or third parties where we need to conduct background checks about you.

### **THE CATEGORIES OF THE DATA WE COLLECT**

We may collect the following categories of personal data about you:

- your name, and contact information such as address, email address & telephone number;
- your date of birth, tax identification number, passport number or national identity card details, country of domicile and your nationality;
- information relating to your financial situation such as income, expenditure, assets and liabilities, sources of wealth, and your bank account details;
- information about your knowledge and experience in the investment field;
- an understanding of your goals and objectives in connection with your wealth;
- information about your employment, education, family or personal circumstances and interests;
- information or background checks to assess whether you may represent a money laundering risk, for example, whether you are a Politically Exposed Person; and

### **THE BASIS FOR PROCESSING YOUR DATA OTHER THAN WITH YOUR CONSENT, HOW WE USE THAT DATA AND WHOM WE SHARE IT WITH**

We may process your personal data because **it is necessary for the performance of a contract** to which you are a party or in order to take steps at your request prior to entering into a contract.

- In this respect, we use your personal data for the following:
  - to prepare a Proposal for you regarding the services we offer;
  - to provide you with the services as set out in our Terms of Engagement with you or as otherwise agreed with you from time to time;
  - to deal with any complaints or feedback you may have;
  - for any other purpose for which you provide us with your personal data.



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In this respect, we may share your personal data with the following:

- your advisers, intermediaries, insurance companies, fund or investment managers and custodians of your assets;
- your advisers and agents of other third parties;
- third party administrators who we may engage to assist in delivering the services to you;
- our advisers where it is necessary for us to obtain their advice or assistance;
- other third parties such as intermediaries, insurance companies, fund managers or investment managers who we introduce to you;
- companies or Trusts within our Group;
- payment processors where we are making payments on your behalf;
- our data storage providers.

We may also process your personal data because **it is necessary for our legitimate interests**.

- In this respect, we may use your personal data for the following:
  - training our staff or monitoring their performance;
  - for the administration and management of our business, including recovering money you owe to us;
  - seeking advice on our rights and obligations, such as where we require our own legal advice.
- In this respect, we may share your personal data with the following:
  - our advisers or agents where it is necessary for us to obtain their advice or assistance;
  - with third parties and their advisers where those third parties are acquiring, or considering acquiring all or part of our business.

We may also process your data for our **compliance with a legal obligation** which we are under.

- In this respect, we may use your personal data:
  - to meet our compliance and regulatory obligations, such as compliance with anti-money laundering laws, and where we are required to monitor, record or store telephone conversations.
- In this respect, we may share your personal data with the following:
  - our advisers where it is necessary for us to obtain their advice or assistance;
  - our auditors where it is necessary as part of their auditing functions;
  - with third parties who assist us in conducting background checks;
  - with relevant regulators or law enforcement agencies where we are required to do so.



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## SHARING OF INFORMATION

Individual's personal data may be disclosed by the Company to its delegates, professional advisors, service providers, regulatory bodies, auditors, technology providers and any duly authorised agents or related, associated or affiliated companies of the foregoing for the same or related purposes.

Individual's personal data may be transferred to countries which may not have the same or equivalent data protection laws as UK. If such transfer occurs, the Company is required to ensure that such processing of Individual's personal data is in compliance with Data Protection Legislation

If you wish to receive details regarding all of the companies which we have engaged to assist in delivering services to entities in respect of which you are connected or have an interest and with whom we have shared your information please contact us at [compliance@waverton.co.uk](mailto:compliance@waverton.co.uk).

## RETENTION OF YOUR DATA

We may retain your personal data for a period of seven years after the termination of our relationship with you in case any claims arise out of the provision of our services to you. However:

- a) Where we have collected personal data as required by anti-money laundering legislation, we may retain your personal data for five years after the termination of our relationship, unless we are required to retain this information by another law or for the purposes of court proceedings.
- b) Where we have provided advice relating to a pension transfer, pension conversion, pension opt-out or free-standing additional voluntary contribution, we will keep your personal data relevant to this indefinitely as we are required to do so by the Financial Conduct Authority.

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