

PRIVACY POLICY



Privacy Policy

We are committed to protecting and respecting your privacy and this policy (together with our Client Agreement Appendix: Protecting your personal information) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. This policy set out our practices regarding your personal data and how we will treat it.

For the purpose of the Data Protection Act 1998 (the Act), CDC Wealth Management Ltd of North East BIC, Enterprise Park East, Sunderland, SR5 2TA is the data controller.

Information we may collect from you

We may collect and process the following data about you:

- Information that you provide to us in the process of the delivery of our service. This includes information provided when completing our 'Fact Find' Document, your contact information, and information provided during completion of any financial reviews and application forms for financial products.
- If you contact us, we will keep a record of that correspondence.
- We may also ask you to complete surveys that we use for client feedback purposes, although you do not have to respond to them.

Where we store your personal data

The data that we collect from you is stored at a destination within the European Economic Area ("EEA"). It may be processed by staff who work for us or for one of our suppliers. Such staff maybe engaged in, among other things, the provision of support and administration services. By submitting your personal data, you agree to this transfer, storing or processing. These agents have access to the personal information required in order to perform their functions but may not use it for any other purpose and we will take all reasonable steps necessary to ensure that your data is treated securely and in accordance with this privacy policy.

All information you provide to us is stored on our secure servers.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

Uses made of the information

We use information held about you in the following ways:

- Where you have consented to be contacted for such purposes, to provide you with information or services that you request from us or which we feel may interest you.
- To perform our contract for services entered into with you. Generally this will be the lawful basis on which we intend to rely for the processing of your data.
- To notify you about changes to our service.

Disclosure of your information

We may disclose your personal information to third parties:

- If you have given your consent for us to do so for marketing or other specified purposes. In the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets.
- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or to protect our rights or property and the safety of our customers or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

Our Client Agreement Appendix: Protecting your personal information allows you to ask us to, or not to process your personal data for marketing purposes. We will usually inform you (before collecting your data) if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes. You can exercise your right to prevent such processing by refusing your consent at the time of collection or at any other time by contacting us at our main office number (0191 516 6812).

How long we retain your personal data for

In principle, your personal data shouldn't be held for longer than is required under the terms of our contract for services with you. However, we are subject to regulatory requirements to retain data for specified minimum periods. As such, we are obliged to retain data relating to pension transfers, pension conversions, pension opt-outs and free-standing additional voluntary contributions indefinitely, and for at least five years from the end of terminating a relationship with CDC for all other products. We also reserve the right to retain data for longer than this if we feel the records could be called upon in the future.

You have the right to request deletion of your personal data. We'll comply with this request, subject to the restrictions of our regulatory obligations and legitimate interests as noted above.

Access to information

The Act gives you the right to access information held about you. Your right of access can be exercised in accordance with the Act.

What can you do if you are unhappy with how your personal data is processed?

You also have a right to lodge a complaint with the supervisory authority for data protection. In the UK this is:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF
0303 123 1113 (local rate)

Changes to our privacy policy

Any changes we may make to our privacy policy in the future will be posted within this policy and, where appropriate, notified to you.