

PRIVACY POLICY

Introduction

This privacy statement applies to Wilmslow Wealth Management Limited T/a Personal Guarantees UK, in the UK and any of its associated or subsidiary undertakings and affiliates which control and make use of any visitor information collected via this site.

If as a visitor to this website, you choose to submit information, you agree to the use of such data in accordance with the terms set out in this privacy statement. Please note that this site contains links to other sites, including sites maintained by other associated members of Wilmslow Wealth Management Limited T/a Personal Guarantees UK, which may not be governed by this privacy statement.

If you have any questions regarding this privacy statement or do not feel that your concerns have been addressed, please direct your questions to our website administrator via info@personalguaranteesuk.com.

Data Protection Controller and Contact Details

Wilmslow Wealth Management Limited T/a Personal Guarantees UK is a “Data Controller” and as such it is required to notify you how your information is held and used pursuant to relevant data protection laws. Questions and queries about this privacy policy and or about or how we as an organisation use your personal data can be sent to our information security manager by email via info@personalguaranteesuk.com.

Information Collection

As a visitor, you do not have to submit any personal information in order to use the Website. The site collects and stores personally identifiable information that is specifically and voluntarily provided by visitors. Such information may consist of, but is not limited to, your name, job title, company address, email address, telephone and fax numbers and any financial information that you choose to disclose and we do not collect such personal information without your knowledge. This information is broadly termed as “personal data” or “personal information”.

In the event that you choose to supply personal information either through the website or by telephone we will collect, use, share and store this personal data. We collect this information when we speak to you on the telephone, from an online application made via our website and from documents, email or other correspondence that you send to us.

Where personal and financial information relating to another person or your partner is supplied by you, you confirm that you have their consent or are otherwise entitled to provide this information to us and for us to use it.

We will collect further information if you contact us with comments or specific requests which may include requests to be contacted for marketing purposes or by social media in which case, in addition to the data set out above, we may also hold, use, share and store marketing preferences, payment details, event attendances, usernames, engagement details, likes, retweets, shares, reactions, comments.

We may also use cookies which are explained below.

We do not usually seek sensitive information (e.g., data relating to race or ethnic origin, religious beliefs, criminal record, physical or mental health, or sexual orientation) from you. We will, where necessary, obtain your explicit consent to collect and use such information.

For training purposes, any calls with us may be recorded. Where calls are recorded you will be advised of this at the outset of the call. Details of any call will be monitored and recorded. Such details will include (but not be limited to) the caller identification telephone number, the number called, the time, date and duration of the call and the disposition of the call (please note that call monitoring excludes the actual call recording).

Cookies

To ensure that our website is well managed and to facilitate improved navigation within the site, we or our service provider(s) may use cookies (small text files stored in a user's browser) to collect aggregate data. We may use such devices to track information on our systems and identify categories of visitors by items such as IP address, domain, browser type and pages visited. This information is reported to our website administrator who uses the information to analyse the number of visitors to different areas of the site and to make sure that our website is serving as a useful, effective information source.

Cookies do not collect personal information such as your name or email address. Cookies can be rejected, however, under specific circumstances visitors may be denied access to some parts of our site if their browsers reject cookies.

To ensure that our website is well managed, we or our service provider may track information on our systems and identify categories of visitors by items such as domain, company IP address and

browser type. Our internal website administrator uses this information to analyse the number of visitors to different areas of our site to make sure that our website is serving as a useful and effective information source.

A list of all of the cookies used on our website is set out below. Brief details of the purpose of these cookies are also set out below together with a guide to indicate the relative intrusive nature of the cookies:

Cross references to the table below

Type of Cookies

1. **Strictly Necessary Cookies** – essential for the operation of the site and to enable you to move around the site. Without these cookies certain parts of the site may not be available.
2. **Performance Cookies** – These cookies collect anonymous information about how visitors use the site. These cookies are only used to improve how the site works.
3. **Functionality Cookies** – Remember choices you make to improve your experience of visiting the site.

Intrusion level key	
Red	Intrusive and collecting personally identifiable information.
Amber	Somewhat intrusive.
Green	Not intrusive and maybe necessary for website operation.

Cookies on this site						
Cookie	Data	Purpose of this cookie	Level	Type	Owner	Lifespan
ASP.NET_SessionID	Tracking ID	Tracks referrer, search engine used, user location, keyword clicked etc.	Green	1	Microsoft	Session
_utma	Tracking ID	Tracks number of visits, last visit, first visit etc.	Amber	2	Google	Infinite
_utmb	Timestamp	Records when visitor enters a site to track total time spent on website.	Amber	2	Google	Session
_utmc	Timestamp	Records when visitor leaves a site to track total time spent on website.	Amber	2	Google	Session
_utmz	Tracking ID	Tracks referrer, search engine used, user location, keyword clicked etc.	Amber	2	Google	6 Months
_utmv	Tracking ID	User-defined report classifications etc.	Amber	2	Google	Infinite

You may be able to block cookies by activating the settings on your browser that allows you to refuse the setting of all or some cookies. If you use your browser settings to block all cookies (to include essential cookies) you may not be able to access all or parts of the site. Unless you have

adjusted your browser setting so that it will refuse cookies, our system will issue cookies as soon as you visit our site and by using the site you agree that we may place these types of cookies on your machine/device.

If you do not wish to consent to cookies being placed, you must change your browser settings which can be done by accessing the following link <http://windows.microsoft.com/en-GB/windows7/Cookies-frequently-asked-questions>. If you choose to do this you should not continue to access the site as the site will issue cookies as soon as you continue to use the site.

Information Use

We will only use any personal information which you supply to us through this website or on the telephone when the law allows us to. The law states that we must identify the purpose and basis upon which we use your personal data. We rely on a number of lawful basis for processing your personal data:-

- i. Where you have given your informed, unambiguous and specific consent;
- ii. Where we need to comply with a lawful obligation;
- iii. Where we need to perform a contract that we have entered into with you; and
- iv. Where it is necessary for us to use your personal information to pursue our legitimate interests (or those of a third party).

We have stated below the purposes for which we use your personal data

We will use your information to comply with our lawful obligations to prevent and detect fraud, money laundering and other crimes, carry out regulatory checks and meet our obligations to any relevant regulatory authority; to assist us in providing our services to you; and to improve and develop our services to you and other customers; and to market to you and we may periodically send promotional emails about new services or other information which we think you may find of interest, using the information you have provided and we will ensure that any such marketing activities comply with applicable law, as well as ensuring that we implement procedures to obtain necessary consents before sending you emails containing information about Personal Guarantees UK and its service offerings so that we can pursue our legitimate interest in creating lasting relationships with our clients. You may at any time request that we discontinue sending you such materials.

In relation to the website and social media platforms only, the personal identifying information you submit is used to process your enquiry and the information gathered from telephone calls allows us to track the source of the call. The cookies information is used pursuant to your consent and to pursue our legitimate interest and to help us understand more about how our website is used and to improve our site.

Disclosure of Information to Third Parties

Although we may provide visitors' information to service providers that handle information on our behalf, we will usually not share the information with third parties or other Redundancy Claims entities for secondary or unrelated purposes unless otherwise disclosed at the point of collection.

Examples of where your personal information will be supplied to third parties are circumstances where we would need to engage those third parties to provide call processing, website administration, public relations and marketing, IT support, document management systems, case management systems, printing, reprographic support, event hosting, email marketing management systems and market insight services. In these scenarios all third parties will be required to take appropriate security measures to protect your personal information in line with our engagement with them and in accordance with the laws. We do not allow third parties to use your personal data for their own purposes.

Where appropriate, personal information may be disclosed to law enforcement, regulatory or other government agencies or third parties where necessary or desirable to comply with legal or regulatory obligations or requests or for the purposes identified above.

In cases where legislation requires us to carry out an identification check, we will validate your name, address and other personal information supplied by you against an appropriate third party database. You should advise us if you do not consent to such a check being made. In performing these checks personal information provided by you may be disclosed to a registered Credit Reference Agency which may keep a record of that information. The checks are only to confirm your identity. A credit check is not performed and your credit rating will be unaffected.

Retention of Personal Data

We will only retain your personal information for as long as necessary to fulfill the purpose for which we collected it in line with statutory and professional rules of retention. In the majority of

instances, the period for retaining your personal data shall be 6 years from the date of closure of contact which you may have with us. In the event that the basis on which we are holding your personal information requires this information to be kept for a reduced period of time then it shall be retained in accordance with our retention policies in place from time to time. Examples of this are:-

- i. Marketing information – the retention period shall be the period of our relationship with you and for a period of 6 years afterwards.
- ii. Social media information – for a period during which we are connected with you on any given social media platform.
- iii. Client matters (including where you are taken on as a client and have an engagement for services with us) – 6 years from the date on which the matter has been closed or has ended.
- iv. Information required by law when commencing a client engagement – period of 6 years from the date on which the relevant matter has ended.

Access to Information

We are dedicated to providing reasonable access to visitors who wish to review the personal information retained, if any. In all cases we will treat requests to access information or change information in accordance with applicable legal requirements and a charge may be levied to cover the administration costs of such requests. Please contact info@personalguaranteesuk.com should you wish to access your personal information.

Your rights in respect of your personal information

Under certain circumstances, by law, you have the right to:-

- i. Request access to your personal information as stated above;
- ii. Request correction of any personal information that we hold about you. We have an obligation to ensure that the information we hold about you is complete and accurate;
- iii. Right to deletion – you have a right to ask us to delete or remove personal information where there is no good reason for us to continue to hold/process it;
- iv. Object to processing – you can object to the processing of your personal information (where we are relying on a legitimate interest or those of a third party) and remove your right to consent in certain circumstances;
- v. Request for transfer – you may request for your data to be transferred to another party and/or put in place a restriction on the processing of such data;

- vi. Withdrawal to consent – where you have provided your consent to the collection, processing and transfer of your personal information for a specific purpose you have the right to withdraw your consent for that specific processing. To withdraw your consent please email info@personalguaranteesuk.com and put in the subject line “withdrawal of consent” and state in the body of the email the nature of the processing to which you wish your consent to be withdrawn.

Information Security

We have in place reasonable commercial standards of technology and operational security to protect all information provided by visitors from loss, misuse, alteration or destruction.

Changes to our Privacy Policy

Wilmslow Wealth Management Limited T/a Personal Guarantees UK, in the UK, reserves the right to modify or amend this privacy statement at any time and for any reason. Nothing contained herein creates or is intended to create a contract or agreement between Wilmslow Wealth Management Limited T/a Personal Guarantees UK and any user visiting the website or providing identifying information of any kind.

Complaints

If you have any concerns over how we have used or are using your data then please contact info@personalguaranteesuk.com in the first instance.

If you are still not satisfied that we have addressed your concerns adequately you have a right to lodge your complaint with the Information Commissioners Office, the details of which are available at www.ico.org.uk.