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## Privacy Notice

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# Privacy Notice

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This privacy notice explains how we use any personal information we collect about you. Vintage Wealth Management Limited (VWM) and Vintage Corporate Limited (VC) (together 'we') are authorised and regulated by the Financial Conduct Authority (FCA). VWM and VC have associated companies; Vintage Asset Management Limited, and Vintage Health Limited, which are also authorised and regulated by the FCA under number 593380.

Everyone has rights with regard to the way in which their personal data is handled. During the course of our activities we will act as a Data Processor in determining how your employees' data will be processed. We recognise that correct and lawful treatment of this data will maintain confidence in the organisation and will provide for successful business operations.

## A. What information do we collect about you?

We collect information about you when you engage us for financial advice and planning services.

This information will relate to your personal and financial circumstances and may also include special categories of personal data such as data about your health, if this is necessary for the provision of our services.

We may also collect information when you voluntarily complete client surveys or provide feedback to us.

Information relating to usage of our website is collected using cookies. These are text files placed on your computer to collect standard internet log information and visitor behaviour information.

## B. Information about connected individuals

We may need to gather personal information about your close family members and dependants in order to provide our service to you effectively. In such cases it will be your responsibility to ensure that you have the consent of the people concerned to pass their information on to us. We will provide a copy of this privacy notice for them or, where appropriate, ask you to pass the privacy information to them.

## C. Why do we need to collect and use your personal data?

We will only ever collect and use information which is personal to you where it is necessary, fair and lawful to do so.

The primary legal basis that we intend to use for the processing of your data is for the performance of our contract with you. The information that we collect about you is essential for us to be able to carry out the services that you require from us effectively.

Without collecting your personal data we would also be unable to fulfil our legal and regulatory obligations.

Where special category data is required we will obtain your explicit consent in order to collect and process this information.

If you do not wish us to collect and use your personal information in this way, it may mean that we will be unable to provide you with any of our services.

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## D. How long do we keep hold of your information?

We collect information about you in order to provide you with the services for which you engage us.

**If you agree**, we may contact you about other products or services that we think may be of interest to you.

## E. Who might we share your information with?

If you agree, we will pass on your personal information to our group of companies so that they may offer you their products and services.

We will not share your information for marketing purposes with companies outside our group of companies.

In order to deliver our services to you effectively we may send your details to third parties such as those that we engage for professional services as well as product and platform providers that we use to arrange financial products for you.

Where third parties are involved in processing your data we will have a contract in place with them to ensure that the nature and purpose of the processing is clear, that they are subject to a duty of confidence in processing your data and that they will only act in accordance with our written instructions.

Where it is necessary for your personal data to be forwarded to a third party we will use appropriate security measures where necessary to protect your personal data in transit. Methods used to enhance the security of the data during transfer may include password protection and/or data encryption.

To fulfil our obligations in respect of prevention of money-laundering and other financial crime we may send your details to third party agencies for identity verification purposes.

## F. How long do we keep hold of your information?

During the course of our relationship we will retain personal data which is necessary to provide services to you, and will take all reasonable steps to keep your personal data up to date throughout our relationship.

In principle, your personal data should not be held for longer than is required under the terms of our contract for services with you. If we are providing services to you, there are minimum periods for which we are legally obliged to retain your personal data. Moreover, your personal data will be retained for as long as is necessary to enter into or perform a contract with you; or for compliance with a legal obligation under EU law or the laws of the United Kingdom; or for the establishment, exercise or defence of future legal claims.

Where you do not enter into a contractual relationship with us, we would expect to retain your information for a period of up to two years. This timeframe has been selected as a reasonable time period for you to decide whether you wish to utilise our services. This period of time can of course be extended, should you wish to do so.

Everybody has a right to erasure under the General Data Protection Regulations. Should you make such a request, we will endeavour to comply subject to the restrictions of our regulatory obligations and legitimate interests. Given that we operate within a regulated financial services environment, it is unlikely that we will delete or remove any data from our systems once a contractual relationship has been entered into as we may be required to provide this either by the Financial Conduct Authority, the Financial Ombudsman Service, or in the establishment, exercise or defence of future legal claims. As such, data provided as part of a contractual relationship is likely to be retained until past the time of your death given the open ended nature of some legal claims.

This does not impact upon your rights of access, rectification, or portability of personal data. You also have the right to withdraw your consent at any time, where relevant.

## G. How can I access the information you hold about me?

You have the right to request a copy of the information that we hold about you. If you would like a copy of some or all of your personal information please email or write to us using the contact details noted below. We will normally provide a copy of the information free of charge, however we may charge a reasonable fee when a request is manifestly unfounded or excessive, particularly if it is repetitive.

When your personal data is processed by automated means you have the right to ask us to move your personal data to another organisation for their use.

We have an obligation to ensure that your personal information is accurate and up-to-date. Please ask us to correct or remove any information that you think is incorrect.

## H. Marketing

We would like to send you information about our products and services and those of other companies in our group which may be of interest to you.

If you have agreed to receive marketing information, you may opt out at a later date.

You have a right at any time to stop us from contacting you for marketing purposes or giving your information to other members of the group. If you no longer wish to be contacted for marketing purposes, please contact us by email or post using the contact details shown below.

## I. Cookies

We use cookies to track visitor use of our website and to compile statistical reports on website activity. For further information visit <http://www.allaboutcookies.org/>

You can set your browser not to accept cookies and the above website tells you how to remove cookies from your browser. However in a few cases some of our website features may not function as a result.

## J. Other websites

Our website contains links to other websites. This privacy notice only applies to this website so when you link to other websites you should read their own privacy policies.

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

We will always strive to collect, use and safeguard your personal information in line with data protection laws. If you do not believe we have handled your information as set out in our Privacy Notice, please contact our Compliance Department at the address below, and we will do our utmost to make things right.

### Vintage Wealth Management Limited

Fairchild House, Redbourne Avenue  
Finchley, London, N3 2BP

If you remain unhappy 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)

## L. Changes to our privacy notice

We keep our privacy notice under regular review and will place any updates on our web page. This privacy notice was last updated on 8th June 2022.

## M. How to contact us

Please contact us if you have any questions about our privacy policy or information we hold about you by email at [info@vintagewealth.co.uk](mailto:info@vintagewealth.co.uk).

Alternatively, you may write to us at the address provided above.



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**Call: 020 8371 3111**

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London N3 2BP

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