

## **GDPR PRIVACY POLICY**

### **GENERAL DATA PROTECTION REGULATION**

The European Union (EU) General Data Protection Regulation (GDPR) will be enforced from 25<sup>th</sup> May 2018. It supersedes the UK Data Protection Act 1998. Under the regulations, the definition of personal data is expanded and individuals are given the right to control and choose how their personal data is used.

### **PERSONAL DATA**

According to the Information Commissioner's Office ([ico.org.uk](http://ico.org.uk)) the GDPR applies to 'personal data' meaning any information relating to an identifiable person who can be directly or indirectly identified by reference to an identifier. The data we collect is detailed below.

### **DATA CONTROLLER**

A controller determines the purposes and means of processing personal data. For the purposes of this policy, Wren is a data controller in respect of any personal information we hold about you.

### **HOW WE OBTAIN YOUR PERSONAL DATA**

We collect personal data through services that we provide and receive. Typically, it comes from the following sources:

- Contractual agreements or other material provided during our relationship.
- Correspondence received from you such as email, telephone conversations, facsimiles, letters, face to face discussions, text messages, contact through our website and other forms of communication. We may keep a record of all correspondence received. We are required to record telephone and electronic communications that contain order execution instructions.
- Depending on our business relationship, we may use third party firms for credit reference and money laundering checks.

### **PERSONAL DATA WE COLLECT**

If you are a customer, we collect information to assist in the provision of services to you. This information may include:

- Your full name including title, maiden name, marital status, date of birth and gender.
- Contact details such as residential address, email and telephone numbers.

- Financial information, including your bank account and details of investments held with us and elsewhere. We may also record details of financial transactions placed across your accounts, whether held with us or elsewhere.
- Identifiers such as your national insurance number or equivalent in overseas jurisdictions, tax reference, driving licence number, passport number, internet protocol address and our own internal identifiers.
- Data used to access our client portal such as username, password, online preferences, and usage information.
- Information required to conduct 'know your client' checks such as details relating to your passport or other photographic identification, your credit history, current and previous addresses and source of funds.
- Other information provided during your dealings with us.

If you are a business associate, we collect information to monitor services we have contracted for, or to assess services that are available to us. This information may include:

- Your full name including title.
- Your occupation and job title.
- Contact details for you at your place of business such as address, email and telephone number.
- Other information provided during your dealings with us.

## **OUR USE OF YOUR INFORMATION**

We collect and use information to provide services to you, or to receive services from you, in accordance with contractual obligations. We only use your information for our legitimate interests or, in certain circumstances, for those of a third party.

Our legitimate interests are:

- To administer and operate customer account(s)
- To provide information relevant to the services we provide.
- To facilitate our business operations and to ensure compliance with any legal and regulatory requirements that we are subject to.

## **INFORMATION DISCLOSURE**

Personal information may be disclosed to third party associates who provide us with professional, legal, accounting or other services. This may include providing personal data to third parties to comply with anti-money laundering regulations. Such processing may involve the use of automated decision making to confirm your identity.

All third parties are required to maintain the confidentiality of your personal data and to treat it in accordance with the law. Third parties are not permitted to use your data for any purpose other than that covered by their contractual arrangements with us.

We may disclose your personal information as required by, or to comply with, legal, regulatory or statutory requirements, or at the request of supervisory or governmental bodies.

Your personal data is not shared with any other organisations for marketing purposes and will not be used by us for marketing purposes unless explicit consent has been provided by you.

## **YOUR RIGHTS**

Data protection laws provide you with the following rights:

- The right to check if we hold personal information about you.
- The right to see the information we hold about you.
- The right to have inaccurate information rectified.
- The right to be forgotten and to have certain information erased.
- The right to restrict processing of your personal data.
- The right to request that your personal information is transferred to a commonly used machine-readable format and provided to you or a third party.
- The right to object to the use of your information, including the right to restrict marketing.
- The right to restrict automated decision making and profiling.
- The right to withdraw consent previously provided to us to handle your information.

To exercise any of these rights, please get in touch using the contact details at the bottom of this policy.

Please note, if you are a client, by executing some of these rights, we may not be able to continue providing services to you.

If you are not satisfied with how we have handled your information you have a right to complain to the Information Commissioner's Office ([ico.org.uk](https://ico.org.uk)).

## **RETENTION**

We can retain your personal information for as long as required to provide services to you. After the termination of contracts, we may retain data for a period of six years to comply with legal and regulatory requirements. After the expiration of six years, your personal data will be deleted.

If compelled to do so by statutory, regulatory or governmental bodies, we may retain your personal data for longer than six years.