



Privacy Notice - How We Use Your Personal Information

Introduction

This Privacy Notice explains how we use your personal information, describes the categories of personal information we process and for what purposes. We take your privacy seriously and we are committed to collecting and using your information fairly and in accordance with the requirements of the General Data Protection Regulation ('GDPR').

This privacy notice may be updated from time to time. You should check www.heartwoodgroup.co.uk regularly so that you can read the up to date version. We will inform you if material changes are made either to the Privacy Notice or to the way that we process your data.

Who we are and how to contact us

Heartwood Investment Management is a trading name of Heartwood Wealth Management Ltd (Heartwood) which is authorised and regulated by the Financial Conduct Authority (FCA) in the conduct of investment business, and is a wholly-owned subsidiary of Svenska Handelsbanken AB (publ).

Our Data Protection Officer can be contacted at No.1 Kingsway, London, WC2B 6AN or at DPO@heartwoodgroup.co.uk if you have queries about this Privacy Notice or wish to exercise any of the rights mentioned in it.

Have you been introduced to us by a broker or other intermediary?

Our products and services are also available through professional and financial advisers and anyone else who acts as a person sitting in between you and us in relation to what we do for you. In this notice we will call these persons "intermediaries".

When an intermediary processes your personal information on our behalf, this privacy notice will apply and you should contact our Data Protection Officer to exercise your rights under data protection laws. When an intermediary processes your personal information as a data controller in its own right, its own privacy notice will apply and you should ask them for a copy if you do not have one by the time you are introduced to us.

What kinds of personal information do we hold about you?

In order to fulfil our obligations to you as our customer, we handle different types of personal information about you. At Heartwood, we organise your personal information into the following categories:

Our Categories of personal information	Description (examples)
Basic personal information	<ul style="list-style-type: none">• Title and full name• Contact details, including: your home address, any other contact address, your address history, home and mobile telephone numbers and email.• Your date of birth• UK National Insurance number• Information on your nationality and citizenship
Personal preferences	<ul style="list-style-type: none">• How you wish to be contacted• Marketing preferences• Acceptance of cookies
Communication	<ul style="list-style-type: none">• A record of your communications with us, including the recording of all telephone calls with us
Financial transactions	<ul style="list-style-type: none">• Bank account and sort code details• Details of third parties we may be asked to make payments to
Financial details	<ul style="list-style-type: none">• Your salary and details of other income• Details of your savings including pensions and other investment products• Details of your expenditure and any borrowings and loans• Details of your knowledge and experience of investments• Information about your tax position

Assessments	<ul style="list-style-type: none"> • Details of assessments carried out for legal and regulatory purposes such as an assessment of the suitability of the advice given
Special categories of personal data	<ul style="list-style-type: none"> • Information about your health • Your marital status, family, lifestyle or social circumstances if relevant to the investment product

Information about other individuals

If you make a joint application with your spouse, partner or family member, we will also collect the personal information mentioned above about that person. You must show this privacy notice to all applicants and ensure they confirm that they know you will share it with us for the purposes described in it.

If there is somebody who has power of attorney over your affairs or has authority to give us instructions, that person will see this privacy notice when we make contact with him/her directly.

How we obtain your personal information

We will generally collect your personal information from you directly via our agreement process and, where relevant, our Client Profile documents. We will also collect and record information about you obtained during telephone conversations, meetings and other correspondence such as emails and letters.

If you are introduced to us by an intermediary, we will obtain some personal information about you from them when they introduce you to us.

We also obtain your personal information from other sources such as:

- publicly available directories and information (eg telephone directory, social media, internet, news articles);
- other third parties you have authorised us to correspond with;
- and other organisations to assist in prevention and detection of crime.

In addition, some of your personal information may come from Handelsbanken if you already have an account or product with them.

How we use your personal information

We only use your personal information where it is fair and lawful to do so. This section explains our legal grounds for collecting and using information about you.

Grounds for collecting and using information about you	Information collected
You have given us your consent	We only rely on your consent for collecting special categories of information such as information about your health when it is relevant to the advice being provided.
It is necessary to fulfil our contract with you	This includes the information we need to provide you with a product or service and where relevant, provide you with suitable advice. Examples include the information we gather about you regarding your financial situation.
It is in our legitimate interest	We may use your information where it is in our legitimate interest to do so. For example using your information to send you publications such as our Monthly Strategy Review and other marketing literature.
It is necessary to fulfil our legal and regulatory requirements	We also use your personal information to meet our regulatory and legal requirements. For example sending you quarterly reports, meeting our anti money laundering obligations and recording and monitoring telephone calls.

How you can withdraw your consent?

Where we do rely on your consent and you have given us this, you have the right to withdraw this and we will no longer collect and use this information. Please be aware that withdrawing your consent could mean that we cannot take into account all relevant information when advising you.

Who we share your personal information with

We will only share information with third parties where authorised to do so by you, to fulfil our contract with you, where there is a legal or regulatory requirement or if it is in our best legitimate interest to do so. This section covers who we share your information with and why. If you would like further details regarding who we share information with, please contact the Data Protection Officer.

Person/Organisation	Why
Other individuals involved in your agreement with us	<ul style="list-style-type: none">• Where you have instructed us to provide information to another individual or signatory of the agreement we will do this to fulfil our contract with you.• Where there is more than one signatory to an agreement such as in the case of joint accounts or accounts for trusts or corporate clients. We will provide your information to all signatories to fulfil our contract with you.
Other providers or third parties you may ask us to provide information to or request information from	<ul style="list-style-type: none">• Where we are dealing with third parties on your behalf such as a pension provider, we will ask for your authority to request information from them and, where necessary share information with them.
The Handelsbanken Group	<ul style="list-style-type: none">• We will share information with the wider group where it is in our legitimate interest to do so.
Supervisory Authorities and HMRC	<ul style="list-style-type: none">• We will share your information with regulatory authorities such as the FCA or the Information Commissioner's Office as required.• We will also share information about you with HMRC.
Other companies we have chosen to support us when providing services and products to you.	<ul style="list-style-type: none">• We share information with a limited number of third parties who support us in providing services to you and enable us to fulfil our contract with you and help us meet our legal or regulatory obligations. For example, we will share your name, address and date of birth with credit reference agencies to electronically verify your identity.
Law enforcement and identity check agencies	<ul style="list-style-type: none">• We share information with law enforcement agencies as required.• In order to electronically verify your identity for anti-money laundering purposes we will use a credit reference agency.

Transfers of your personal information outside of the UK or the EEA

We are based in the UK but sometimes we may need to transfer your personal information outside the UK or the European Economic Area (EEA). If it is processed within Europe or other parts of the EEA then it is protected by European data protection standards.

Some countries outside the EEA do have adequate protection for personal information under laws that apply to us. We will make sure that suitable safeguards are in place before we transfer your personal information to countries outside the EEA.

What should you do if your personal information changes?

You should tell us without delay so that we can update our records. You can contact your usual contact to do this. Alternatively, you can contact our Data Protection Officer.

Do you have to provide your personal information to us?

We are unable to provide you with any products or services without having personal information about you. Your personal information is required before you can enter into an agreement with us and is required during the life of that agreement.

How long we keep your personal information for

We will hold the majority of your personal information for a period of 10 years following the end of your contract with us, however there are some exceptions to this. If you would like further information about our data retention practices, contact our Data Protection Officer using the details set out above.

What are your rights under data protection laws?

You have a number of rights under data protection laws. They do not apply in all circumstances. For more information or if you wish to exercise any of them, please contact the Data Protection Officer.

Your data protection rights	Description
The right to be informed	We have to be transparent with you about the personal information we collect and how we use it. This is why we have a privacy notice.
The right to have your personal information corrected	If you believe any of your information is incorrect, wrong or incomplete we will take steps to check it and correct any factual inaccuracies.
The right to object to processing of your personal information	You can object to our use of your personal information where we rely on legitimate interests (as described above).
The right to restrict processing of your personal information	You can ask us to stop using your personal information for certain reasons. In most cases we will still be able to keep your information but we will ensure that we do not use it in the future for the reasons you have restricted.
The right to have your personal information deleted (also known as the “ <i>right to be forgotten</i> ”)	If we no longer need to keep your information you can ask us to delete it. We will do so if we have no legal, regulatory or compelling business reason to keep it.
The right to request access to your personal information	You can ask us to provide you with a copy of the personal information that we hold about you.
The right to port your personal information to another firm	If we hold your personal information electronically and use it with your consent or to fulfil our contractual obligation with you, you can ask us to transfer the data to another organisation in a safe and secure way and in a machine readable format.

Cookies

We may use cookies and other similar technologies on our website. Cookies are small text files that may be stored on your computer or mobile device when you visit a website. These technologies may do different things, such as letting you navigate between web pages efficiently and remembering your preferences. Our website provides further information on how and where we use cookies and how you can control them.

How to make a complaint?

We aim to provide complete client satisfaction but we also recognise that there may be a time when you feel that we haven't delivered and would like to make a complaint. If you think things have gone wrong and you are unhappy with us, please contact your usual contact or the Data Protection Officer in the first instance and they will try to assist you. More information on how to complain can be found on our website.

If you are still unhappy you have the right to complain to the Information Commissioner's Office which enforces data protection laws. Further details can be found on their website www.ico.org.uk.