**Privacy Notice**

*Your privacy matters*

This Privacy Notice explains in detail how the new legislation from the European Union under the General Data Protection Regulation (GDPR) will give you more rights about your personal information and us more obligations to protect your privacy. It comes into effect on the 25 May 2018 and we want you to know how we collect your personal information, how we use it and how you can interact with us about it. We use plain English but please contact us on +44 203 890 8222 or email info@globalwealthmap.com if you need further explanation on any of our terms.

In the following pages we explain:

1. Who we are and the legal basis we rely on
2. How we collect information about you
3. How we keep your information safe
4. How we use your information
5. How your information is shared
6. How long we keep your information
7. How we meet our regulatory and legal obligations
8. Consent
9. International transfers of data
10. Your personal information rights
11. How to lodge a complaint and contact the regulator
12. Updates
13. Any questions

We hope the following sections will answer any questions you have but if not, please do get in touch with us.

1. **Who we are and the legal basis we rely on**

Global WealthMAP Limited is an independent wealth planning business serving an international client base. When we refer to Global WealthMAP, we or us we refer to the above-mentioned company. Global WealthMAP Limited is authorized and regulated by the Financial Conduct Authority. Our Company Registration Number is 09194858 (England and Wales).

1. **How we collect information about you**

We collect personal information from you in our discovery meetings. We ask for your consent to record these meetings and send you a written copy for you to edit and approve. You also fill in fact find forms and / or confidential client questionnaires and share information through our continued wealth planning services. We maintain a schedule of personal data held, how it is held (for example, electronically, on paper), purpose for which the information is held (administration, ongoing support, marketing).

**3.** **How we keep your information safe**

We protect your information with security measures under the laws that apply to meet international standards. Global WealthMAP ensure that our computers, files and offices are secure. All your personal information is stored on our secure privacy protected cloud-based platform. All emails with personal detail are password protected. If you contact us to ask about your information, we may ask you to identify yourself in order to protect your information.

1. **How we use your information**

We use information about you to develop a summary of your financial position and maintain a client profile which highlights your priorities and what is important to you. We use the relevant personal data to provide you with a bespoke WealthMAP and to identify ways that Global WealthMAP can improve our wealth planning services. Your information helps us to understand your lifestyle choices and your financial behaviour. It helps us to discover the best way for us to interact with you. We use your information to protect both our interests and to meet our legal and regulatory obligations.

1. **How your information is shared**

We sometimes need to share your information with third parties in order to provide you with the financial products, service and information that you require. We expect these third parties (who also have to comply with GDPR) to have the proper data protection in place to ensure that your rights are protected. We also have to share information with third parties to meet our legal and regulatory obligations or lawful request. When we believe we have been given false or misleading information, or we suspect criminal activity we must record this and tell law enforcement agencies, which may be either in or outside the European Union.

1. **How long we keep your information**

In order to satisfy Global WealthMAP’s regulatory and legal commitments, we hold your information while you are a client and for a period of time thereafter. We will not hold your personal data any longer than necessary.

**7. How we meet our regulatory and legal obligations**

To meet our regulatory and legal obligations, Global WealthMAP collects your personal information, verifies it with you, keeps it up to date through regular checks, and deletes it when we no longer need to keep it. We may also gather information about you from third parties to help us meet our obligations. If you do not provide the information we need, or help us keep it up to date, we may not be able to provide you with our services. We explain how you can interact with us about your personal information.

1. **Consent**

With the new GDPR regulations we need your ongoing consent because we hold your personal information like your name and date of birth. You will need to sign a declaration of ongoing consent saying that you know what personal data we hold and how we use it, but you will have the option to withdraw your consent at any time. If you provide us with data of your minor children, you must be aware that we hold their names and dates of birth and if your children are over the age of thirteen they need to be advised directly that we hold their information and must read our Privacy Notice. We maintain a declaration of ongoing consent log. You can remove your consent at any time by contacting us.

**9. International transfers of data**

We may transfer your personal information outside of the European Economic Area (EEA) to help us provide your products and services. We expect the same standard of data protection is applied outside of the EEA to these transfers and the use of the information, to ensure your rights are protected.

**10. Your personal information rights**

You are entitled to access your information – on your written request we will provide you with a copy of the personal information we hold. You can ask us about how we collect, share and use your personal information. On your written request we will update and correct your personal information and you can change your mind and withdraw your consent at any time. If you ask us to delete your personal information (your right to be forgotten) we will oblige if you have a legitimate and valid reason for doing so and if it complies with our retention policy set out in our Client Agreement. Where possible we can share a digital copy of your information directly with you or another organisation (your right to portability). When you contact us to ask about your information, we may ask you to identify yourself. This is to help protect your information. We generally do not charge you when you contact us to ask about your information.

**11. How to lodge a complaint and contact the regulator**

If you have a complaint about the way your personal data is handled by us, please lodge complaint with the Information Commissioner’s Office. You can contact the Information Commissioner’s Office on 0303 123 1113 or online at [www.ico.org.uk/concerns](http://www.ico.org.uk/concerns). If based outside the UK, you have the right to lodge a complaint with the relevant data protection regulator in your country of residence.

**12. Updates**

It is likely that we will need to update this Privacy Notice from time to time. We promise to notify you of any significant changes, but you are most welcome to check back with us at any time.

**13. Any questions**

We hope this Privacy Notice has been helpful in setting out the way we handle your personal data and your rights to control it. If you have any questions that haven’t been covered, please contact our Data Protection Officer who will be pleased to help you.

Email us at [info@globalwealthmap.com](mailto:info@globalwealthmap.com) or write to us at Global WealthMAP Limited, Hanover House, 203 High Street, Tonbridge, Kent, TN9 1BW

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