

Privacy Policy for Efficient Portfolio Wealth Limited

This policy applies to our trading styles of The Trusted Team and The Oakham Office

Data Overview

The type of personal information we collect

During the course of our relationships with clients and customers, we ask them to provide us with detailed personal information relating to their existing circumstances, their financial situation and, in some cases, their health and family health history (Sensitive Personal Data).

The definition of Sensitive Personal Data means any information that describes or relates to an individual's personal circumstances. Personal Data may identify someone directly, for example their name, address, date of birth, national insurance number. Personal Data may also identify someone indirectly, for example, their employment situation, their physical and mental health history, or any other information that could be associated with their cultural or social identity.

In the context of providing estate planning, introductions to Financial Advisers, or in the case of The Trusted Team, our coaching services, and sometimes for the purpose of health and safety at our events, the Sensitive Personal Data we collect, process and store may include:

- Title, name, date of birth, gender, nationality, civil/marital status, contact details, addresses and documents that are necessary to verify identity.
- Employment and remuneration information, (including salary/bonus schemes/overtime/sick pay/other benefits), employment history.
- Bank account details, tax information, loans and credit commitments, personal credit history, sources of income and expenditure, family circumstances and details of dependents.
- Health status and history, details of treatment and prognosis, medical reports (further details are provided below specifically with regard to the processing we may undertake in relation to this type of information).
- Any pre-existing investment and/or protection products and the terms and conditions relating to these.

How we get the personal information and why we have it

Most of the personal information we process is provided to us directly by our clients and prospects for one of the following reasons:

- To obtain information, access a marketing tool or to enter a competition. Examples of this are book downloads and online calculators.
- In order for us to review and assess existing financial products or strategies in order to provide estate planning services or recommend the best Financial Adviser for their needs.
- In order for us to comply with health and safety laws and procedures.

We also receive personal information indirectly, from the following sources in the following scenarios:

- Through online directories that we subscribe to, such as Vouched For and Unbiased.
- Through our joint venture partners and introducers, such as accountants and solicitors.
- Through the purchasing of data used for marketing campaigns.

We use the information that you have given us in order to:

- Provide information or invitations through marketing.
- Provide financial planning (both assessment and new guidance).
- Validate identity for anti-money laundering purposes.

We may share this information with affiliated partners, or third-party accountants and solicitors within our 'Trusted Team', but only with the client's consent. We may also share information with providers of the estate planning products or strategies that you have asked for us to arrange on your behalf.

Under the General Data Protection Regulation (GDPR), the lawful bases we rely on for processing this information are:

(a) Your consent. You are able to remove your consent at any time. You can do this by contacting Charlotte Colton on charlotte@efficientportfolio.co.uk or calling 01572 898060

(b) We have a contractual obligation.

(c) We have a legal obligation.

(d) We have a vital interest.

(e) We need it to perform a public task, i.e. AML checks.

(f) We have a legitimate interest.

How We Store Your Personal Information

Your information is securely stored on our encrypted servers and within our secure back-office systems (Intelligent Office and Send In Blue). For full details surrounding our data security, please request a copy of our Data Security Policy from Charlotte Colton (charlotte@efficientportfolio.co.uk).

We keep Sensitive Personal Data for various period of time, depending on the strategies we have put in place and the various required retention periods dictated by the FCA. In the case of pure marketing data (i.e. where a prospect does not take u our services) data is deleted after a period of 3 months or sooner if requested. We will then dispose your information by fully deleting electronic files or data entries and confirming that these have been removed from our cloud storage, or having paper copies securely destroyed by our outsourced shredding company.

Your Data Protection Rights

Under data protection law, you have rights including:

- Your right of access - You have the right to ask us for copies of your personal information.
- Your right to rectification - You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.
- Your right to erasure - You have the right to ask us to erase your personal information in certain circumstances.
- Your right to restriction of processing - You have the right to ask us to restrict the processing of your personal information in certain circumstances.

- Your right to object to processing - You have the right to object to the processing of your personal information in certain circumstances.
- Your right to data portability - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.
- You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

Please contact us at hello@efficientportfolio.co.uk or call 01572 898060 if you wish to make a request. Alternatively, you can write to us at:

Portfolian House
30 Melton Road
Oakham
Rutland
LE15 6AY.

How to Complain

If you have any concerns about our use of your personal information, you can make a complaint to us at hello@efficientportfolio.co.uk or call 01572 898060.

You can also complain to the ICO if you are unhappy with how we have used your data.

The ICO's address:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Helpline number: 0303 123 1113

ICO website: <https://www.ico.org.uk>