

Arcturus Wealth Management

Privacy Notice

Arcturus Wealth Management takes the protection of your privacy very seriously. We will only use your personal information to deliver the services you have requested from us, and to meet our legal responsibilities.

How do we collect information from you?

We obtain information about you when you engage us to deliver our [products and/or] services and/or when you use our website, for example, when you contact us about our [products and/or] services.

What type of information do we collect from you?

The personal information we collect from you will vary depending on which [products and/or] services you engage us to deliver. The personal information we collect might include your name, address, telephone number, email address, your Unique Tax Reference (UTR) number, your National Insurance number, bank account details, your IP address, which pages you may have visited on our website and when you accessed them.

How is your information used?

In general terms, and depending on which [products and/or] services you engage us to deliver, as part of providing our agreed services we may use your information to:

- contact you by post, email or telephone
- verify your identity where this is required
- understand your needs and how they may be met
- maintain our records in accordance with applicable legal and regulatory obligations
- process financial transactions, prevent and detect crime, fraud or corruption

We are required by legislation, other regulatory requirements and our insurers to retain your data where we have ceased to act for you. The period of retention required varies with the applicable legislation but is typically five or six years. To ensure compliance with all such requirements it is the policy of the firm to retain all data for a period of seven years from the end of the period concerned.

Who has access to your information?

We will not sell or rent your information to third parties.

We will not share your information with third parties for marketing purposes.

Any staff with access to your information have a duty of confidentiality under the ethical standards that this firm is required to follow.

Third Party Service Providers working on our behalf

We may pass your information to our third party service providers, agents, subcontractors and other associated organisations for the purposes of completing tasks and providing services to you on our behalf, for example to process payroll or basic bookkeeping. However, when we use third party service providers, we disclose only the personal information that is necessary to deliver the service and we have a contract in place that requires them to keep your information secure and not to use it for their own purposes.

Please be assured that we will not release your information to third parties unless you have requested that we do so, or we are required to do so by law, for example, by a court order or for the purposes of prevention and detection of crime, fraud or corruption.

How you can access and update your information

Keeping your information up to date and accurate is important to us. We commit to regularly review and correct where necessary, the information that we hold about you. If any of your information changes, please email or write to us, or call us using the 'Contact information' noted below.

You have the right to ask for a copy of the information Arcturus Wealth Management holds about you.

Security precautions in place to protect the loss, misuse or alteration of your information

Whilst we strive to protect your personal information, we cannot guarantee the security of any information you transmit to us, and you do so at your own risk.

Once we receive your information, we make our best effort to ensure its security on our systems. Where we have given, or where you have chosen, a password which enables you to access information, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

Your data will usually be processed in our offices in the UK. However, to allow us to operate efficient digital processes, we sometimes need to store information in servers located outside the UK, but within the European Economic Area (EEA). We take the security of your data seriously and so all our systems have appropriate security in place that complies with all applicable legislative and regulatory requirements.

Your choices

We may occasionally contact you with details of any changes in legal and regulatory requirements or other developments that may be relevant to your affairs and, where applicable, how we may assist you further. If you do not wish to receive such information from us, please let us know by contacting us as indicated under 'Contact information' below.

Your rights

Access to your information

You have the right to request a copy of the personal information about you that we hold.

Correcting your information

We want to make sure that your personal information is accurate, complete and up to date and you may ask us to correct any personal information about you that you believe does not meet these standards.

Deletion of your information:

You have the right to ask us to delete personal information about you where:

- you consider that we no longer require the information for the purposes for which it was obtained
- you have validly objected to our use of your personal information - see 'Objecting to how we may use your information' below
- our use of your personal information is contrary to law or our other legal obligations
- we are using your information with your consent and you have withdrawn your consent - see 'withdrawing consent to use your information' below

Restricting how we may use your information

In some cases, you may ask us to restrict how we use your personal information. This right might apply, for example, where we are checking the accuracy of personal information about you that we hold or assessing the validity of any objection you have made to our use of your information. The right might also apply where there is no longer a basis for using your personal information but you do not want us to delete the data. Where this right is validly exercised, we may only use the relevant personal information with your consent, for legal claims or where there are other public interest grounds to do so.

Objecting to how we may use your information

Where we use your personal information to perform tasks carried out in the public interest then, if you ask us to, we will stop using that personal information unless there are overriding legitimate grounds to continue.

Withdrawing consent to use your information

Where we use your personal information with your consent you may withdraw that consent at any time and we will stop using your personal information for the purpose(s) for which consent was given.

Please contact us in any of the ways set out in 'Contact information' below if you wish to exercise any of these rights.

Special category data

Certain types of personal data are considered more sensitive and so are subject to additional levels of protection under data protection legislation. These are known as 'special categories of data' and include data concerning your health, racial or ethnic origin, genetic data and sexual orientation. Data relating to criminal convictions or offences is also subject to additional levels of protection.

We may process: health information and lifestyle information when providing intermediary services in relation to a protection insurance product; and/or criminal conviction or offence information when providing intermediary services in relation to a general insurance product.

In addition to the lawful basis for processing this information set out in the above table, we will be processing it either:

- (i) for the purpose of advising on, arranging or administering an insurance contract or
- (ii) for the establishment, exercise or defence of legal claims.

In the course of our activities relating to the prevention, detection and investigation of financial crime, we may process criminal conviction or offence information. Where we do so, in addition to the lawful basis for processing this information set out in this policy, we will be processing it for the purpose of compliance with regulatory requirements relating to unlawful acts and dishonesty.

Marketing

We may use personal data we hold about you to help us identify, tailor and provide you with details of products and services from us that may be of interest to you. We will only do so where we have a legitimate business reason to do this and will do so in accordance with any marketing preferences you have provided to us. In addition, where you provided your consent, we may provide you with details of products and services of third parties where they may be of interest to you.

You can opt out of receiving marketing at any time. If you wish to amend your marketing preferences please contact us:

By phone: 02392 461988
By email: advice@arcturuwealth.com

Your rights

You have legal rights under data protection regulation in relation to your personal data. These are set out under the below headings:

- To access personal data
- To correct / erase personal data
- To restrict how we use personal data
- To object to how we use personal data
- To ask us to transfer personal data to another organisation
- To object to automated decisions
- To find out more about how we use personal data

Changes to our privacy notice

We keep this privacy notice under regular review. Paper copies of the privacy notice may also be obtained from **Arcturus Wealth Management**.

This privacy notice was last updated on 23 September, 2019.

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W: arcturus-wealth.com

Arcturus Wealth Management is a trading name of AI Wealth Management LLP.

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