

Data Protection Policy

Version 24 (28 March 2022)

Introduction

This policy relates to 'Wealth Wizards', which currently includes Wealth Wizards Limited and its subsidiary Wealth Wizards Benefits Limited.

Wealth Wizards takes its responsibilities regarding the requirements of the General Data Protection Regulation (GDPR) very seriously. This policy sets out how Wealth Wizards manages those responsibilities.

Wealth Wizards obtains, uses, stores and otherwise processes personal identifiable data relating to potential employees (applicants), current employees, former employees, contractors and customers, collectively referred to in this policy as *data subjects*. When *processing* personal identifiable information, Wealth Wizards is obliged to fulfil the *data subjects'* reasonable expectations of the applicable data privacy and protection laws, including the Data Protection Act 2018 in the UK and the GDPR.

This policy therefore seeks to ensure that Wealth Wizards employees are;

1. clear about how personal identifiable information must be processed and our expectations for all those who *process personal data* on Wealth Wizards' behalf;
2. complying with the data protection law;
3. protecting our reputation by ensuring that personal identifiable information entrusted to us is processed in accordance with *data subjects'* rights; and
4. protecting Wealth Wizards from the risks of data breaches and other breaches of data protection law.

Italicised words in this Data Protection Policy have their meaning set out in Appendix 2 Glossary of Terms at the end of this document.

Scope

The Wealth Wizards Data Protection Policy applies to all personal identifiable information we *process* regardless of the location where that *personal data* is stored and regardless of the *data subject*. All employees and others *processing* personal identifiable information on behalf Wealth Wizards must read this policy, failure to comply with this policy may result in disciplinary action.

All line managers are responsible for ensuring that Wealth Wizards employees within their area of responsibility comply with this policy and should review all appropriate practices, processes, controls and training to ensure that compliance have been implemented.

The Wealth Wizards *Data Protection Officer* is responsible for overseeing this policy.

GDPR Data Protection Principles

When *processing* personal identifiable information, Wealth Wizards is guided by the following principles, which are set out in the GDPR (Article 5). Wealth Wizards is

responsible for, and must be able to demonstrate compliance with, the data protection principles listed below:

Those principles require the management of personal identifiable information to conform to the following:

Lawfulness, fairness and transparency	<i>Personal data</i> shall be processed lawfully, fairly and in a transparent manner in relation to the <i>data subject</i> . (Details on how we achieve this can be found in Appendix 1).
Purpose limitation	<i>Personal data</i> shall be collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with the purpose for which it was collected. (Details on how we achieve this can be found in Appendix 1).
Data minimisation	<i>Personal data</i> shall be adequate, relevant and limited to what is necessary in relation to the purposes for which it was collected. (Details on how we achieve this can be found in Appendix 1).
Accuracy	<i>Personal data</i> shall be accurate and, where necessary, kept up to date. (Details on how we achieve this can be found in Appendix 1).
Storage limitation	<i>Personal data</i> shall be kept in a form which permits identification of <i>data subjects</i> for no longer than is necessary for the purposes for which the <i>personal data</i> was collected. (Details on how we achieve this can be found in Appendix 1).
Integrity and confidentiality	<i>Personal data</i> shall be processed in a manner that ensures appropriate security of the <i>personal data</i> , including protection against unauthorised or unlawful <i>processing</i> and against accidental loss, destruction or damage, using appropriate technical or organisational measures. (Details on how we achieve this can be found in Appendix 1).
Accountability	The controller shall be responsible for and be able to demonstrate compliance with the GDPR.

Data Subjects' Rights

Data subjects have rights in relation to the way that Wealth Wizards processes their *personal data*. These include the following rights to:

<p>access <i>personal data</i></p>	<p>The <i>data subject</i> can request Wealth Wizards to confirm whether we have and are using their personal data. <i>Data subjects</i> can also ask for a copy of their <i>personal data</i> from Wealth Wizards and for information on how we <i>process</i> it. Wealth Wizards is required to ask the <i>data subject</i> for proof of identity when making a request to exercise these rights. Wealth Wizards does this to ensure we only disclose information or change personal identifiable information where we know we are dealing with the <i>data subject</i>.</p> <p>Wealth Wizards will not ask for a fee, unless we believe the <i>data subjects'</i> request is unfounded, repetitive or excessive. Where a fee is necessary, Wealth Wizards will inform the <i>data subject</i> before proceeding with their request. Wealth Wizards aims to respond to all valid requests within one month. It may however take longer if the request is particularly complicated or the <i>data subject</i> has made several requests. Wealth Wizards will always let the <i>data subject</i> know if a response will take longer than one month. To speed up the response, we may ask for more details to be provided about what the <i>data subject</i> wishes to receive or are concerned about.</p> <p>Wealth Wizards may not always be able to fully address the request, for example if it would impact the duty of confidentiality of others, or if we are otherwise legally entitled to deal with the request in a different way.</p>
<p>correction or erasure of <i>personal data</i></p>	<p>The <i>data subject</i> can ask that Wealth Wizards rectify any information which is incorrect. Wealth Wizards will be happy to rectify such information but may need to verify the accuracy of the information first.</p> <p>The <i>data subject</i> can ask that Wealth Wizards erases their <i>personal data</i> if they believe we no longer need to use it for the purpose we originally obtained it. The <i>data subject</i> can ask that Wealth Wizards erase their <i>personal data</i> if they have withdrawn their <i>consent</i> to Wealth Wizards using their information (if we originally asked for <i>consent</i> to use the information).</p> <p>It should be noted that Wealth Wizards may not always be able to comply with the <i>data subjects</i> request, for example where we are required to keep using the <i>personal data</i> in order to comply with our legal obligation or where we need to retain it to establish, exercise or defend legal claims.</p>
<p>restrict how Wealth Wizards uses <i>personal data</i></p>	<p>The <i>data subject</i> can ask that Wealth Wizards restricts the use of their <i>personal data</i> in certain circumstances, for example:</p> <ul style="list-style-type: none"> • where the <i>data subject</i> believes the information is inaccurate and Wealth Wizards needs to verify it; • where Wealth Wizards' use of the <i>data subject's personal data</i> is no longer required, but they do not want us to erase it;

	<ul style="list-style-type: none"> • where the information is no longer required for the purposes for which it was collected, but Wealth Wizards needs it to establish, exercise or defend legal claims; or • where the <i>data subject</i> has objected to Wealth Wizards' use of their <i>personal data</i>, but we still need to verify if we have overriding grounds to use it. <p>Wealth Wizards can continue to use <i>personal data</i> following a request for restriction where we have regulatory obligations; or we need to use it to establish, exercise or defend legal claims, or we need to use it to protect the rights of another individual or a company.</p>
object to how Wealth Wizards uses <i>personal data</i>	<p>The <i>data subject</i> can object to any use of their <i>personal data</i> which Wealth Wizards has justified based on of our legitimate interest, if the <i>data subject</i> believes their fundamental rights and freedoms to data protection outweigh our legitimate interest in using the information. If the <i>data subject</i> raises an objection, Wealth Wizards may continue to use the <i>personal data</i> if we can demonstrate that we have compelling legitimate interests to use the information.</p>
to transfer <i>personal data</i> to another organisation	<p>The <i>data subject</i> can request Wealth Wizards to provide their <i>personal data</i> to them in a structured, commonly used, machine-readable format, or they may ask to have it transferred directly to another <i>data controller</i> (e.g. another company).</p> <p>The <i>data subject</i> may only exercise this right where Wealth Wizards uses the <i>personal data</i> in order to perform a contract with them, or where we asked for their <i>consent</i> to use their <i>personal data</i>. This right only applies to data that:</p> <ul style="list-style-type: none"> • is held electronically, and • the <i>data subject</i> has provided to Wealth Wizards.
object to <i>automated decisions</i> (including <i>profiling</i>)	<p>If Wealth Wizards made a decision about the <i>data subject</i> based solely by automated means (i.e. with no human intervention), and the decision made by us produces a legal effect concerning them, or significantly affects them, then the <i>data subject</i> may have the right to contest that decision, expressing their point of view and ask for a human review. These rights do not apply where Wealth Wizards is authorised by law to make such decisions and has adopted suitable safeguards in the decision-making processes to protect the <i>data subjects'</i> rights and freedoms.</p>
find out more about how Wealth Wizards uses <i>personal data</i>	<p>If the <i>data subject</i> is not satisfied with the level of information that they have been provided, then they can request Wealth Wizards to supply the following:</p> <ul style="list-style-type: none"> • What <i>personal data</i> we have about them and where we got their data from; • What we use their information for and what <i>automated decisions</i> were made; • Who we disclose their information to and whether we transfer it abroad;

	<ul style="list-style-type: none"> • How we protect their information and how long we keep it for; • What rights they have and how they can make a complaint.
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Accountability and Responsibilities

Wealth Wizards must implement appropriate technical and organisational measures in an effective manner to ensure compliance with data protection principles. As a *data controller*, Wealth Wizards is responsible for establishing policies and procedures in order to comply with data protection law. Wealth Wizards must be able to demonstrate compliance with, the data protection principles therefore we must apply adequate resources and controls to ensure and to document GDPR compliance including:

<p>Appointment a suitably qualified <i>Data Protection Officer</i> (DPO).</p>	<p>The <i>Data Protection Officer</i> is responsible for:</p> <p>(a) advising Wealth Wizards and its staff of its obligations under GDPR.</p> <p>(b) monitoring compliance with this Regulation and other relevant data protection law, Wealth Wizards' policies with respect to this and monitoring training and audit activities relating to GDPR compliance.</p> <p>(c) to provide advice where requested on <i>data protection impact assessments</i>.</p> <p>(d) to cooperate with and act as the contact point for the Information Commissioner's Office.</p> <p>(e) the <i>data protection officer</i> shall in the performance of his or her tasks have due regard to the risk associated with <i>processing</i> operations, considering the nature, scope, context and purposes of <i>processing</i>.</p>
<p>Implement <i>Privacy by Design</i> when <i>processing personal data</i>.</p>	<p>We are required to implement privacy-by-design measures when <i>processing personal data</i>, by implementing appropriate technical and organisational measures (like <i>pseudonymisation</i>) in an effective manner, to ensure compliance with data-protection principles. Wealth Wizards must ensure therefore that by default only <i>personal data</i> which is necessary for each specific purpose is processed. The obligation applies to the volume of <i>personal data</i> collected, the extent of the <i>processing</i>, the period of storage and the accessibility of the <i>personal data</i>. By default, <i>personal data</i> should not be available to an indefinite number of persons.</p>
<p>Complete a <i>Data Protection Impact Assessment (DPIA)</i> (where <i>processing</i> presents a high risk to the privacy of <i>data subjects</i>).</p>	<p>Wealth Wizards must also conduct <i>DPIAs</i> in respect of high-risk <i>processing</i> before that <i>processing</i> is undertaken.</p> <p>We should conduct a <i>DPIA</i> (and discuss our findings with the <i>DPO</i>) in the following circumstances:</p>

	<ul style="list-style-type: none"> • the use of new technologies (programs, systems or processes), or changing technologies (programs, systems or processes); • automated <i>processing</i> including <i>profiling</i>; • large scale <i>processing</i> of special category data; and • large scale, systematic monitoring of a publicly accessible area. <p>A <i>DPIA</i> must include:</p> <ul style="list-style-type: none"> • a description of the <i>processing</i>, its purposes and the <i>data controller's</i> legitimate interests if appropriate; • an assessment of the necessity and proportionality of the <i>processing</i> in relation to its purpose; • an assessment of the risk to individuals; and • the risk-mitigation measures in place and demonstration of compliance.
Integrate data protection into our policies and procedures	Wealth Wizards must document the way <i>personal data</i> is handled by us and by producing required documentation such as Privacy Policies, Data Processing Registers and records of <i>Personal Data Breaches</i> ;
Implement Staff training	Wealth Wizards must train employees on compliance with Data Protection Law and keeping a record accordingly; and regularly test the privacy measures implemented, conducting periodic reviews and audits to assess compliance, including using results of testing to demonstrate compliance improvement effort.
Ensure employee engagement	<p>Employees who process personal identifiable information about <i>data subjects</i>, must comply with the requirements of this policy. Employees must ensure that:</p> <ul style="list-style-type: none"> • all <i>personal data</i> is kept securely; • no <i>personal data</i> is disclosed either verbally or in writing, accidentally or otherwise, to any unauthorised third party; • <i>personal data</i> is kept in accordance with Wealth Wizards' retention schedule; • any queries regarding data protection, including subject access requests and complaints, are promptly directed to <i>Data Protection Officer</i>; • any data protection breaches are swiftly brought to the attention of the <i>Data Protection Officer</i> and that they support Risk Engineering in resolving breaches; • where there is uncertainty around a data protection matter advice is sought from Risk Engineering and the <i>Data Protection Officer</i>;

	<p>All managers responsible for supervising employees whose work involves the <i>processing</i> of personal information, must ensure that those employees are aware of the Data Protection principles.</p> <p>Employees who are unsure about to whom they can legitimately disclose <i>personal data</i> should seek advice from their line manager or the <i>Data Protection Officer</i>.</p>
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Contractors, Short-Term Employees

Wealth Wizards is responsible for the use made of *personal data* by anyone working on its behalf. When employing contractors, or short-term staff, Wealth Wizards must ensure that they are appropriately vetted for the data they will be *processing*. In addition, line managers should ensure that;

- any *personal data* collected or processed in the course of work undertaken for Wealth Wizards is kept securely and confidentially;
- all *personal data* is returned to Wealth Wizards on completion of the work. Alternatively, that the data is securely destroyed, and Wealth Wizards receives notification in this regard from the contractor or short-term staff;
- Wealth Wizards receives prior notification of any disclosure of *personal data* to any other organisation or any person who is not a direct employee of the contractor;
- any *personal data* made available by Wealth Wizards, or collected in the course of the work, is neither stored nor processed outside the UK unless written *consent* to do so has been received from Wealth Wizards; and
- all practical and reasonable steps are taken to ensure that contractors, short term staff do not have access to any *personal data* beyond what is essential for the work to be carried out effectively.

Third-Party Data Processors

Where external companies are used to *process personal data* on behalf of Wealth Wizards, responsibility for the security and appropriate use of that data remains with Wealth Wizards.

Where a third-party data processor is used;

- a data processor must be chosen which provides sufficient guarantees about its security measures to protect the *processing of personal data*;
- reasonable steps must be taken that such security measures are in place;
- a written contract establishing what *personal data* will be processed and for what purpose must be set out; and
- a data processing agreement must be signed by both parties.

For further guidance about the use of third-party data processors should be sort from the *Data Protection Officer*.

Data Subject Access Requests

Data subjects have the right to receive a copy of their *personal data* which is held by Wealth Wizards. In addition, an individual is entitled to receive further information about Wealth Wizards' *processing* of their *personal data* as highlighted above in the section *Data Subjects' Rights*.

Employees should not allow third parties to persuade them into disclosing *personal data* without proper authorisation. For example, a partner or spouse does not have an automatic right to gain access to their partner or spouse's data.

Wealth Wizards employees must immediately forward any Data Subject Access Request they receive to the *Data Protection Officer*. The entitlement is not to documents per se, but to such *personal data* as is contained in the document. The right relates to *personal data* held electronically and to limited manual records. Under no circumstances should you alter, conceal, block or destroy personal data once a request for access has been made. Guidance should be sort from the *Data Protection Officer* before any changes are made to *personal data* which is the subject of an access request.

Full details relating on the steps to be followed upon receiving such a request can be found here [Subject Access Request Process](#).

Reporting a Personal Data Breach

The GDPR requires that we report to the Information Commissioner's Office (ICO) any *personal data breach* where there is a risk to the rights and freedoms of the *data subject*. Where the *Personal data breach* results in a high risk to the *data subject*, he/she also has to be notified unless subsequent steps have been taken to ensure that the risk is unlikely to materialise, security measures were applied to render the *personal data* unintelligible (e.g. encryption) or it would amount to disproportionate effort to inform the *data subject* directly. In the latter circumstances, a public communication must be made, or an equally effective alternative measure must be adopted to inform *data subjects*, so that they themselves can take any remedial action.

Wealth Wizards has put in place procedures to deal with any suspected *personal data breach* ([Personal Data Breach Notification](#)) and will notify *data subjects* or the ICO where we are legally required to do so.

If an employee identifies or suspects that a *personal data breach* has occurred, they should immediately contact the *Data Protection Officer* and follow the instructions in the *Personal Data Breach Notification* procedure. Employees must retain all evidence relating to *personal data* breaches to enable Wealth Wizards to maintain a register of such breaches, as required by the GDPR.

Records of *personal data* breaches must include;

- the facts surrounding the breach;

- its effects; and
- the remedial action taken.

Limitations on the Transfer of Personal Data

The GDPR restricts data transfers to countries outside the UK in order to ensure that the level of data protection afforded to individuals by the GDPR is not undermined. Wealth Wizards will only transfer *personal data* outside the UK if one of the following conditions applies;

- a decision confirming that the country to which we transfer the *personal data* ensures an adequate level of protection for the *data subject's* rights and freedoms.
- appropriate safeguards are in place such as standard contractual clauses, an approved code of conduct or a certification mechanism; and
- the performance of a contract between us and the *data subject* (e.g. the *data subject* is residing overseas).

Employees should seek guidance from the *Data Protection Officer* before any cross-border transfer of *personal data* to outside the UK or the EEA takes place.

Record Keeping

The GDPR requires Wealth Wizards to keep full and accurate records of all our data *processing* activities. All business areas must keep and maintain accurate records reflecting their *processing*, including records of *data subjects' consents* and procedures for obtaining *consents*, where *consent* is the legal basis of *processing*.

These records should be maintained within the [Wealth Wizards Data Processing Register](#), the minimum information required includes, clear descriptions of the *personal data* types, *data subject* types, *processing* activities, *processing* purposes, third-party recipients of the *personal data*, *personal data* storage locations, *personal data* transfers, the *personal data's* retention period and a description of the security measures in place.

Training and Audit

We are required to ensure that all Wealth Wizards employees undergo adequate training to enable them to comply with data protection law. Wealth Wizards must also regularly test systems and processes to assess compliance.

All employees must undergo all mandatory data protection related training, line managers must regularly review all the systems and processes under their control to ensure they comply with this policy.

Direct Marketing

We are subject to certain rules and privacy laws when marketing to our clients and any other potential users of our services.

A *data subject's* prior *consent* is required for electronic direct marketing (for example, by email or text). The limited exception is for existing customers known as "soft opt in" which allows Wealth Wizards to send marketing texts or emails if we have obtained contact details in the course of providing a service to that person, are marketing similar services, and we give the *data subject* an opportunity to opt out of marketing when first collecting the details and in every subsequent message.

The right to object to direct marketing must be explicitly offered to the *data subject* in an intelligible manner so that it is clearly distinguishable from other information.

A *data subject's* objection to direct marketing must be promptly honoured. If a *data subject* opts out at any time, their details should be suppressed as soon as possible. Suppression involves retaining just enough information to ensure that marketing preferences are respected in the future.

Sharing Personal Data

In the absence a legal basis of *processing*, *personal data* should not generally be disclosed to third parties unrelated to Wealth Wizards.

Some bodies have a statutory power to obtain information (e.g. regulatory bodies such as the Financial Conduct Authority, ICO and HMRC). Wealth Wizards should seek confirmation of any such power before disclosing *personal data* in response to a request. For further guidance, please contact the *Data Protection Officer*.

Further, without a warrant, the police have no automatic right of access to records of *personal data*, though voluntary disclosure may be permitted for the purposes of preventing/detecting crime or for apprehending offenders. Wealth Wizards should seek written assurances from the police that the relevant exemption applies. For further guidance, please contact the *Data Protection Officer*.

Some additional sharing of *personal data* for research purposes may also be permissible, subject to certain safeguards.

Appendix 1 - Principles of the GDPR

Principle 1 of the GDPR – Processing personal data lawfully, fairly and transparently

Lawfulness and fairness

Wealth Wizards may only *process personal data* fairly and lawfully and for specified purposes. These restrictions are not intended to prevent *processing* but ensure that we *process personal data* for legitimate purposes without prejudicing the rights and freedoms of *data subjects*. In order to be justified, Wealth Wizards may only *process personal data* if the *processing* in question is based on one (or more) of the legal basis set out below. The section below deals with justifying the processing of sensitive *personal data* including special category data.

Conditions for lawful processing under Article 6(1)

Processing personal data will be lawful only if, and to the extent that, at least one of the conditions in Article 6 of the GDPR is met.

The legal basis for *processing* non-sensitive *personal data* are as follows:

- The *data subject* has given their *consent*.
- The *processing* is necessary for the performance of a contract with the *data subject*.
- To meet our legal compliance obligations.
- To protect the *data subject's* vital interests (i.e. matters of life or death).
- To pursue our legitimate interests (or another's legitimate interests) which are not overridden because the *processing* prejudices the interests or fundamental rights and freedoms of the *data subject*. When *processing personal data* on the grounds of legitimate interests, Wealth Wizards will complete a legitimate interest assessment to judge the purpose, need and balance (is the legitimate interest overridden by the *data subjects'* interests, rights or freedoms?) of the *processing*.

Wealth Wizards must identify the legal basis that is being relied on for each *processing* activity, which will be included in the *Privacy Policy* provided to *data subjects*.

Consent

Wealth Wizards will only obtain a *data subject's consent* if there is no other legal basis for the *processing*. *Consent* requires genuine choice and genuine control.

A *data subject* *consents* to *processing* of their *personal data* if they indicate agreement clearly either by a statement or positive action to the processing. Silence, pre-ticked boxes or inactivity are therefore unlikely to be sufficient. If *consent* is given in a document that deals with other matters, Wealth Wizards must ensure that the *consent* is separate and distinct from those other matters.

Data subjects must be able to withdraw *consent to processing* easily at any time. Withdrawal of *consent* must be promptly honoured. *Consent* may need to be renewed if Wealth Wizards intends to *process personal data* for a different and incompatible purpose which was not disclosed when the *data subject* first consented, or if the consent is historic.

Wealth Wizards must ensure that we have evidence of *consent* and should keep a record of all consents obtained so that we can demonstrate compliance.

Legal basis for Processing Special Category Data

Special Category Data is data concerning:

- Racial or ethnic origin.
- Political opinions.
- Religious or philosophical beliefs.
- Trade union membership.

It also includes the *processing* of:

- Bio-metric data for the purpose of uniquely identifying a natural person.
- Data concerning health.
- Data concerning a natural person's sex life or sexual orientation.

Personal data relating to criminal convictions and offences including the alleged commission of offences or proceedings for offences or alleged offences should be treated in the same way to special category data.

The *processing* of special category data by Wealth Wizards must be based on one of the following (together with one of the legal basis for *processing* non-sensitive *personal data* as listed above):

- The *data subject* has given explicit *consent* (requiring a clear statement, not merely an action).
- The *processing* is necessary for complying with employment law.
- The *processing* is necessary to protect the vital interests of the *data subject* or another person where the *data subject* is physically or legally incapable of giving *consent*.
- The *processing* relates to *personal data* which are manifestly made public by the *data subject*.
- The *processing* is necessary for the establishment, exercise or defence of legal claims.
- The *processing* is necessary for reasons of substantial public interest (provided it is proportionate to the aim pursued and considers the privacy rights of the *data subject*).

- The *processing* is necessary for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes if it is subject to certain safeguards (i.e. *pseudonymisation* or *anonymisation* where possible, the research is not carried out for the purposes of making decisions about particular individuals and it must not be likely to cause substantial damage/distress to an individual and is in the public interest).

Examples of special category data processed by Wealth Wizards may include:

1. Details of relevant unspent convictions for the purposes of assessing eligibility to access products or services offered by Wealth Wizards.
2. Details of relevant unspent convictions for the purposes of recruiting relevant staff.
3. Checks conducted by the Disclosure and Barring Service for the purposes of assessing eligibility of employees to engage in work within financial services.
4. Health data for the purposes for assessing fitness to work/occupational health.
5. Details of disability for the purposes of assessing and implementing reasonable adjustments to Wealth Wizards' policies, criteria or practices.

Processing special category data represents a greater intrusion into individual privacy than *processing* non-sensitive *personal data*. Wealth Wizards therefore takes special care when *processing* special category data and ensures that all employees comply with this policy and the data protection principles (as set out in the main body of this policy), in ensuring the security of special category data.

Transparency (notifying data subjects)

Under the GDPR Wealth Wizards is required to provide detailed, specific information to *data subjects* depending on whether the information was collected directly from *data subjects* or from elsewhere. That information is provided through our *Privacy Policy* which must be concise, transparent, intelligible, easily accessible, and in clear and plain language so that a *data subject* can easily understand what happens to their *personal data*.

Whenever Wealth Wizards collects *personal data* directly from *data subjects*, at the time of collection we provide the *data subject* with all the prescribed information which includes:

- Wealth Wizards' details.
- Contact details for the *Data Protection Officer*.
- Purposes of *processing*.
- Legal basis of *processing*.
- Where the legal basis is legitimate interest, identify the specific interest.
- Where the legal basis is *consent*, the right to withdraw.

Principle 2 of the GDPR - Purpose limitation

Personal data must be collected only for specified, explicit and legitimate purposes. It must not be further processed in any manner incompatible with those purposes.

Wealth Wizards does not use *personal data* for entirely new, different or incompatible purposes from those disclosed when it was first obtained unless we have informed the *data subject* of the new purposes. Where the further *processing* is not based on the *data subject's consent* or on a lawful exemption from data-protection law requirements, Wealth Wizards will assess whether a purpose is incompatible by considering factors such as:

- The link between the original purpose/s for which the *personal data* was collected and the intended further *processing*.
- The context in which the *personal data* has been collected – in particular Wealth Wizards -*data subject* relationship, we should consider whether the *data subject* would reasonably anticipate the further *processing* of their *personal data*.
- The nature of the *personal data* whether it involves special categories of *personal data* (i.e. sensitive) or *personal data*.
- The consequences of the intended further *processing* for the *data subjects*.
- The existence of any appropriate safeguards e.g. encryption or *pseudonymisation*.

Provided that prescribed safeguards are implemented, further *processing* for research purposes or for statistical purposes will not be regarded as incompatible. Safeguards include ensuring data minimisation (e.g. *pseudonymisation* or *anonymisation* where possible), the research will not be carried out for the purposes of making decisions about individuals and it must not be likely to cause substantial damage/distress to an individual.

Principle 3 of the GDPR – Data minimisation

Personal data must be adequate, relevant and limited to what is necessary in relation to the purposes for which it is processed. Wealth Wizards will not therefore amass large volumes of *personal data* that is not relevant for the purposes for which it is intended to be processed. Conversely, *personal data* must be adequate to ensure that we can fulfil the purposes for which it was intended to be processed.

Wealth Wizards employees will only *process personal data* when performing their role requires it and do not *process personal data* for any reason unrelated to their duties.

Wealth Wizards ensures that when *personal data* is no longer needed for specified purposes, it is deleted or *anonymised* in accordance with Wealth Wizards' data retention policy and schedule.

Principle 4 of the GDPR - Accuracy

Personal data must be accurate and, where necessary, kept up to date.

Incomplete records can lead to inaccurate conclusions being drawn and, where there is such a risk, Wealth Wizards will ensure that relevant records are completed.

Wealth Wizards must check the accuracy of any *personal data* at the point of collection and at regular intervals thereafter. Wealth Wizards takes all reasonable steps to destroy or amend inaccurate records without delay and up-dates out-of-date *personal data* where necessary.

Where a *data subject* has required their *personal data* to be rectified or erased, Wealth Wizards will inform recipients of that *personal data* that it has been erased/rectified, unless it is impossible or significantly onerous to do so.

Principle 5 of the GDPR – Storage limitation

Wealth Wizards does not keep *personal data* in a form that allows *data subjects* to be identified for longer than needed for the legitimate business purposes or other purposes for which Wealth Wizards collected it. Those purposes include satisfying any legal, accounting or reporting requirements. Records of *personal data* can be kept for longer than necessary if *anonymised*.

Wealth Wizards takes all reasonable steps to destroy or erase from our systems all *personal data* that we no longer require in accordance with all relevant retention schedules and policies. Wealth Wizards has a data retention policy which can be found [here](#).

Wealth Wizards ensures that *data subjects* are informed of the period for which their *personal data* is stored or how that period is determined in our *Privacy Policy*.

Principle 6 of the GDPR – Security, Integrity and Confidentiality

Wealth Wizards is required to implement and maintain appropriate safeguards to protect *personal data*, considering the risks to *data subjects* presented by unauthorised or unlawful *processing* or accidental loss, destruction of, or damage to their *personal data*. Safeguarding will include the use of encryption and *pseudonymisation* where appropriate. It also includes protecting the confidentiality (i.e. that only those who need to know and are authorised to use *personal data* have access to it), integrity and availability of the personal data. Wealth Wizards regularly evaluates and tests the effectiveness of those safeguards to ensure security of our processing of personal data.

Wealth Wizards employees are also responsible for protecting the *personal data* that they *process* in the course of their duties. Employees must therefore handle *personal data* in a way that guards against accidental loss or disclosure or other unintended or unlawful *processing* and in a way that maintains its confidentiality. Staff must exercise particular care in protecting special category data from loss and unauthorised access, use or disclosure.

Wealth Wizards ensures compliance with all procedures and technologies we put in place to maintain the security of all *personal data* from the point of collection to the point of destruction.

Wealth Wizards employees must comply with all applicable aspects of our [Information Security Policy](#) and comply with and not attempt to circumvent the administrative, physical and technical safeguards Wealth Wizards implements and maintains in accordance with the Data Protection Law standards to protect *personal data*.

Wealth Wizards only transfers *personal data* to third-party service providers (i.e. data processors) who provide sufficient guarantees to implement appropriate technical and organisational measures to comply with Data Protection Law and who agree to act only on Wealth Wizards' instructions. Data processors are therefore only appointed subject to Wealth Wizards' standard contractual requirements for data processors.

Appendix 2 - Glossary of Terms

GDPR Standard Glossary of Terms	
<i>Anonymisation or Anonymised</i>	<i>Anonymisation</i> is the process of removing personal identifiers, both direct and indirect, that may lead to an individual being identified. Once data is truly <i>anonymised</i> and individuals are no longer identifiable, the data will not fall within the scope of the GDPR and it becomes easier to use.
<i>Automated decisions</i>	When a decision is made which is based solely on automated <i>processing</i> (including <i>profiling</i>) which produces legal effects or significantly affects an individual. The GDPR prohibits Automated Decision-Making (unless certain conditions are met) but not automated <i>processing</i> .
<i>Consent</i>	Agreement which must be freely given, specific, informed and be an unambiguous indication of the <i>data subject's</i> wishes by which they, by a statement or by a clear positive action, signifies agreement to the <i>processing of personal data</i> relating to them.
<i>Data Controller</i>	A natural or legal person (such as a company) which determines the means and purposes of the processing of personal data. For example, Wealth Wizards Benefits Ltd is a data controller as we determine how we will collect personal data, the scope of the personal data which will be collected, and the purposes for which it will be used in the course of us providing our <i>services</i> .
<i>Data Processor</i>	A natural or legal person, public authority, agency or other body which processes personal data on behalf of the <i>Data Controller</i> . <i>Data Processors</i> act on behalf of the relevant <i>Data Controller</i> and under their authority.
<i>Data Subject</i>	A living, identified or identifiable individual about whom we hold <i>Personal Data</i> .
<i>Data Protection impact assessment (DPIA)</i>	Tools and assessments used to identify and reduce risks of a data <i>processing</i> activity. A <i>DPIA</i> can be carried out as part of <i>Privacy by Design</i> and should be conducted for all major system or business change programs involving the <i>processing of personal data</i> .
<i>Data Protection Officer (DPO)</i>	The person appointed as such under the GDPR and in accordance with its requirements. A <i>DPO</i> is responsible for advising Wealth Wizards (including its employees) on their obligations under Data Protection Law, for monitoring compliance with data protection law, as well as with Wealth

	Wizards' policies, providing advice, cooperating with the ICO and acting as a point of contact with the ICO.
Personal Data	Any information identifying a <i>data subject</i> or information relating to a <i>data subject</i> that we can identify (directly or indirectly) from that data alone or in combination with other identifiers we possess or can reasonably access. <i>Personal data</i> includes special categories of data and <i>pseudonymised personal data</i> but excludes anonymous data or data that has had the identity of an individual permanently removed. <i>Personal data</i> can be factual (for example, a name, email address, location or date of birth) or an opinion about that person's actions or behaviour.
Personal Data Breach	Any breach of security resulting in the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or unauthorised access to, <i>personal data</i> , where that breach results in a risk to the <i>data subject</i> . It can be an act or omission.
Privacy by Design	Implementing appropriate technical and organisational measures in an effective manner to ensure compliance with the GDPR.
Privacy Policy	Separate policies setting out information that may be provided to <i>data subjects</i> when Wealth Wizards collects information about them. These policies may take the form of general privacy statements applicable to a specific group of individuals (for example, employees, tenants and customers or a website <i>privacy policy</i>) or they may be stand-alone, one-time privacy statements covering <i>processing</i> related to a specific purpose.
Processing or Process	Any activity that involves the use of <i>personal data</i> . It includes obtaining, recording or holding the data, or carrying out any operation or set of operations on the data including organising, amending, retrieving, using, disclosing, erasing or destroying it. <i>Processing</i> also includes transmitting or transferring <i>personal data</i> to third parties. In brief, it is anything that can be done to <i>personal data</i> from its creation to its destruction, including both creation and destruction.
Profiling	Any form of automated <i>processing</i> of <i>personal data</i> consisting of the use of <i>personal data</i> to evaluate certain personal aspects relating to an individual, to analyse or predict aspects concerning that individual's performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements. <i>Profiling</i> is an example of automated <i>processing</i> .
Pseudonymisation or Pseudonymised	Replacing information that directly or indirectly identifies an individual with one or more artificial identifiers or pseudonyms so that the person, to whom the data relates, cannot be

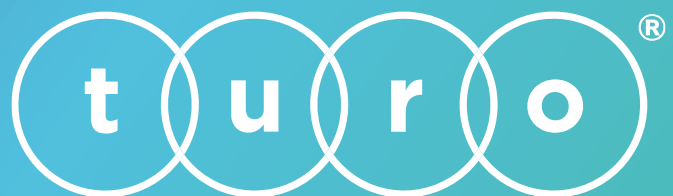
	identified without the use of additional information which is meant to be kept separately and secure.
<i>Re-identification or Re-identify</i>	The process of re-connecting <i>Pseudonymised</i> data with a <i>Data Subject</i> using one or more additional data sets.

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