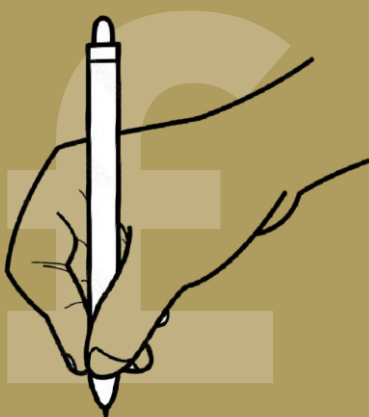


Customer Privacy Notice

Protecting your information
with the utmost care and transparency



THANKS[®]
WEALTH PLANNING

The Privacy Notice

Introduction

In order to provide you with financial planning services we will collect and hold personal data about and on you **(Your Personal Data)** and, in some cases, your health and family health history **(Your Special Category Data)**. This document is important as it allows us to explain to you what we will need to do with Your Personal Data and Your Special Category Data, and the various rights you have in relation to Your Data.

We are also required to comply with the UK GDPR (General Data Protection Regulation), which sits alongside the Data Protection Act 2018, and as such hereby set out details as to how we process your data and your rights.

What do we mean by “Your Personal Data” and “Your Special Category Personal Data”?

Your Personal Data and Special Category Personal Data means any information that describes or relates to your personal circumstances. In the context of providing, you with assistance in relation to our wealth planning services and your investment, pension, finance and/or insurance requirements Your Personal Data and Your Special Category Data may include:

Your Personal Data

- Title, name, date of birth, gender, nationality, civil/marital status, contact details, national insurance number, addresses, email address and documents that are necessary to verify your 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
- Any pre-existing investment, pension, finance and/or insurance products and the terms and conditions relating to these

Your Special Category Personal Data

- Physical and mental health history
- Cultural or social identity
- Political opinions
- Racial or ethnic origin
- Religious and philosophical beliefs
- Sexual orientation or sex life
- Genetic or biometric data
- Health status and history, details of treatment and prognosis and medical reports

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Why we need your data:

We need your data in order for us to:

- Provide financial planning services to you in accordance with this agreement which may include but not limited to giving you financial advice and making recommendations as to investments and financial products which are suitable for you, taking into account current financial markets and economic conditions, availability of products and the providers of those products, as well as a detailed analysis of your personal circumstances and requirements.
- Comply with our regulatory obligations imposed by the Financial Conduct Authority in regard to the relevant 'Know Your Client' obligations. In addition, to comply with the Regulator's requirements for record keeping for the purposes of audits and reviews, records of transactions undertaken and customer histories for prescribed periods of time as directed.
- Respond to any legitimate legal requests for information about you to the Regulatory authority or pursuant to an order of any court or tribunal having relevant jurisdiction, or as required by law for the purposes of but not limited to combatting fraud, money-laundering and criminal activities.
- Carry out our legitimate business and professional management responsibilities which include but are not limited to providing you with suitable advice, ensuring your portfolio and financial products continue to be suitable for you, adhere to anti money laundering requirements and investigating and resolving complaints.

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General information about your data and your rights:

Where we collect data directly from you, we will undertake:

- In addition to those third-party companies expressly detailed in this agreement, to inform you in writing of the name and contact details of the data controller for that data and their representative. For example, where we arrange an investment on your behalf with a third-party investment provider, the data controller may be the financial institution in question.
- To inform you, where appropriate, of the contact details for any Data Protection Officer appointed by us.
- To inform you and make clear the purposes for which the data is to be processed and the legal basis for that processing. In the event that the legal basis to be relied on is that of the legitimate interests of the data controller or any third party, we will inform you as to the nature of those legitimate interests.
- To inform you of the recipients or categories of recipients of data.
- In the event that the data controller proposes to transfer the data to a country other than those covered by the GDPR, to provide you with details of the safeguards surrounding such transfers and how to obtain a copy of them.
- To inform you of the period for which we propose to hold the data, or where this is not possible, the criteria which we will apply to data retention.

To remind you of your rights whereby you may:

- request access to data of which you are the data subject
- object to, or withdraw consent for, the processing of the same
- obtain rectification of inaccurate data
- prevent data processing for the purposes of direct marketing
- object to decisions being taken by automated means and to have the logic behind those decisions clearly explained
- claim compensation for damages caused by a breach of the Act
- request data erasure

Where you exercise your right to request (via email or post) access to data of which you are the data subject, we will undertake to respond to you within 30 calendar days of receipt of your request. There will be no charge for this service unless the request is manifestly unfounded or excessive in which case we reserve the right to charge a fee or refuse to respond.

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You may at any time, by giving notice to us in writing, request that we cease to process your data. We will undertake to comply with any such request as soon as is reasonably practicable.

Where the legal basis for the processing of your data is to adhere to compliance with a statutory or contractual obligation, or the necessary precondition to entering into a contract, including compliance with the requirements of any Regulator, we will inform you as to:

- Whether you are legally required to provide such data, and
- The consequences of failing to provide such data

Where we obtain your data otherwise than directly from you, you will have the same or equivalent rights to those set out above.

Save in the circumstance as detailed below, we will inform you which source the data originated from and whether it came from publicly accessible sources. The information to be provided will be in accordance with the following time periods, whichever shall occur first:

- As soon as practicable after obtaining the data and in any event within 1 month
- At the time of our first communication with you using the data
- When the data is first disclosed to another person

We shall not be obliged to provide you with the information:

- Where you already have this information
- Where we are subject to an obligation of professional secrecy prohibiting the disclosure of the information
- Where disclosure would render impossible or severely impair the achievement of the reasons for which the data is to be processed. In such cases, we will do what we can to protect your rights and freedoms with respect to our processing of the data

You have the right to complain in regard to any aspect of the processing of your data and any breach of the above rights to the relevant supervisory authority, who in the case of the United Kingdom is the Information Commissioners Office, whom may be contacted at:

- Online: www.ico.org.uk
- Phone: 0303 123 1113

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Sensitive Data:

We may need to collect sensitive personal data including information about your health, ethnic origin, or criminal prosecutions from you and third parties such as employers and credit reference agencies, fraud prevention agencies and other similar organisations in order to provide you with the services, for example where you require advice on protection or annuity products.

To provide our financial planning services, we must ensure we understand your health, beliefs, and other factors to ensure we are able to provide you with the most appropriate advice and products. This means that we may obtain your sensitive personal data from the third parties referred to above for the purpose of providing you with the services and share it with third party providers to obtain quotes on your behalf for example where we are providing you with annuity or protection advice as part of our services.

We believe that we can obtain and hold sensitive data about you under the lawful basis of 'Legal Claims'.

Holding your data:

We undertake to review the data we hold on you on a regular basis to ensure compliance with data protection law. In the course of any review, we will:

- Delete any data which is trivial or transitory in nature, or which in our opinion is no longer required for the purposes set out above.
- Update the data to ensure that any errors or inaccuracies are corrected.
- Archive data as detailed below.
- Subject to the data retention periods, as detailed below, securely delete the data when it is identified that we no longer need to hold it.
- The data collected by our AI systems may be stored and processed in data centres located in [insert country or region]. We may also use third-party service providers who store data on our behalf in these locations. Please be aware that the data may be transferred to, processed, and stored in different locations, some of which may be outside of your country of residence. We take necessary steps to ensure that your data is handled securely in accordance with applicable privacy regulations.

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We may retain and process your data for the following periods. investments, more than one period applies to the same data, we will retain the data to the last such period to expire:

- We will hold any agreements between you and us for a period of 6 years from the termination or expiry of the agreement unless we have been notified of any claim or circumstance which might give rise to a claim under or by reference to such agreements.
- We will process data relating to investments which we have provided advice on and / or arranged for you. We will process such data throughout the entire period you are and remain a client of the firm and for a period of not less than 6 years following our ceasing to provide service to you Active, those investments. In the case of long-term investments, we may process your data until the date of maturation of such long-term investments.
- We will hold data as required by any Regulator until the end of any limitation period imposed by that Regulator, which in the case of the Financial Conduct Authority is currently 6 years for all types of business undertaken except for Occupational Pension Schemes, which can include Defined Benefit Transfers and Scheme Money Purchase Transfers, whereby the data retention period is indefinite.
- We will hold data as required by any relevant third party until the end of any limitation period imposed by that relevant third party, which in the case of HMRC shall be 7 years, unless we are notified that any period is considered "open" by HMRC in which case it will be until we are notified the period is "closed".
- We will hold data as required for the purposes of any legal proceedings for a period of 6 years following the conclusion of any such proceedings unless a longer period is required pursuant to any court rule or enactment. Proceedings will be taken to have concluded on the expiry of any period given for appealing any final judgment or on the date of concluding any settlement staying all relevant claims if the proceedings were settled before judgement.
- Save for the above, we will hold data for a maximum of 50 years from the date we receive the data.

Archiving data:

We will regularly review data and where in our opinion such data has ceased to be Active, we will archive it and process it only as Archived Data. Any data which is deemed Archived Data will only be processed in limited circumstances.

All storage of data, whether Active Data or Archived Data will be in accordance with good industry practice and will be undertaken in accordance with organisational systems and procedures, which will be regularly reviewed, to maintain the security of data.

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Data portability:

On the termination or expiry of any agreement to provide services to you and on your written request, we will, subject to our right to retain copies of data for the purposes set out above, agree to return any data you have provided to us in a structured, commonly used machine-readable format, or transfer the same to a new data controller nominated by you.

Whom we may share your data with:

In order to carry out our legitimate business and to provide you with financial planning services, we have entered into agreements with and will share your information with several external companies, for the purposes fulfilling our regulatory and servicing duties and include Compliance, IT systems security, data management, control and auditing. Full details of these companies addresses (all UK based) and contact details are available on request:

You have the right to:

- Access your data processed by our AI systems.
- Request correction or deletion of your personal data.
- Object to the processing of your data by AI in certain circumstances.
- Withdraw consent where processing is based on consent.

For any concerns or enquiries about your data or our AI practices, please contact us at **07563 529918**

In addition to the above listed companies, you will be notified in accordance with the terms of this agreement as to the name and contact details of the data controller for any other third-party entity with whom we share and / or transfer your data and their representative.

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Marketing

From time to time, we may wish to contact you with details of other investment, pension or financial products and/or services which we think may be of interest and/or beneficial to you. If you consent to us contacting, you for this purpose then please tick the options below options, how you would like to be contacted:

Post ☐ Phone ☐ SMS ☐ Email ☐ Instant Messaging ☐

If you do not tick any of the above options, we will reasonably assume that you do not wish to be contacted by us purposes, additional investment, pension or financial products and services.

We will not use your data for marketing purposes of any sort unless you have expressly given us your prior consent. The use of your data as detailed in the remained of this agreement is not affected by whether you choose to consent to the use of data for marketing purposes.

- From Third Party Investment, Pension or Financial Institutions within the UK:

We may also like to pass on your details to other Investment, Pension or Financial Institutions within the UK so that they may contact you with details of their products and services which may be of interest and/or beneficial to you. If you consent to us passing on your details to third party financial institutions within the UK for this purposes, then please tick the options below options, how you would like them to contact you:

Post ☐ Phone ☐ SMS ☐ Email ☐ Instant Messaging ☐

If you do not tick any of the above options, we will reasonably assume that you do not wish to be contacted by any third-party financial institutions within the UK regarding their investment, pension or financial products and services.

Please note that you may withdraw your consent to marketing at any time by giving us notice in writing.

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Legal Terms:

If any provision, or part thereof, of this agreement is found by any court or administrative body of competent jurisdiction to be invalid, unenforceable or illegal, the other provisions shall remain in force.

In the event of any change in Data Protection Law occurring after the date of this agreement which requires the adoption of revised provisions dealing with data retention or portability, the parties will use all reasonable endeavours to agree such consequential changes to this agreement as may reasonably be required to comply with the requirements of Data Protection Law ("Compliant Terms") and incorporate the same as an amendment to this agreement.

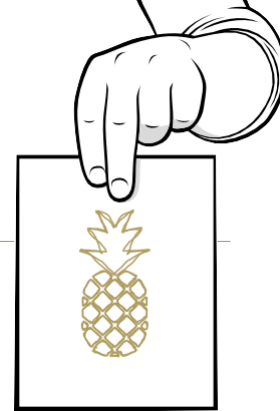
How to contact our Firm in relation to the use of Your Personal Data

If you have any questions or comments about this document, or wish to make contact in order to exercise any of your rights set out within it please contact:

- Sam Whybrow: 07563 529918, sam@thankswp.com or Thanks Wealth Planning, 3rd Floor, 86-90 Paul Street, London, EC2A 4NE

If we feel we have a legal right not to deal with your request, or to action, it in different way to how you have requested, we will inform you of this at the time. You should also contact us as soon as possible on you becoming aware of any unauthorised disclosure of Your Personal Data or Your Special Category Personal Data, so that we may investigate and fulfil our own regulatory obligations.

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Declaration and Consent:

We take your privacy very seriously and will only use your personal information and data to administer the services we have agreed to provide you with, including but not limited to any products or contracts for investments, pensions, life cover or mortgages you have made or entered into through our firm.

By signing this Data Protection and Privacy Notice you are confirming your agreement to these terms.

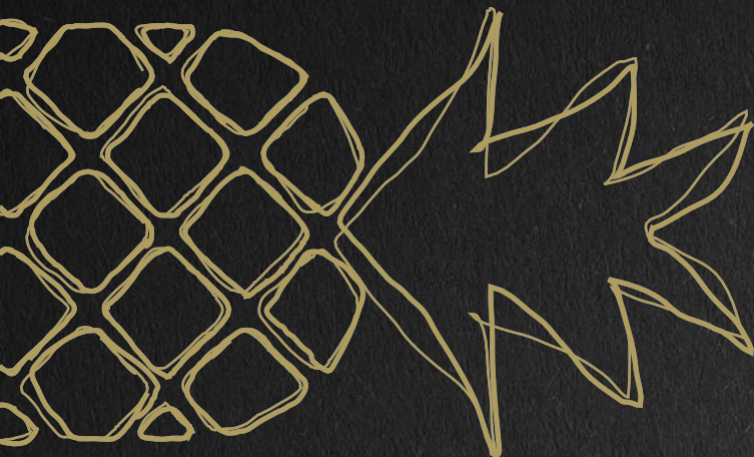
By signing this Data Protection and Privacy Notice you are also confirming your marketing preferences as detailed in the 'Marketing' section of this agreement whereby you have given your consent, or otherwise, for either us and/or third-party providers to contact you about additional products and services.

You further acknowledge, by signing this Data Protection and Privacy Notice, that you have been made aware of, and give your consent to, this firm's policy on sharing your data with other companies as detailed in the 'Whom we may share your data with' section of this agreement.

Name:

Signed:

Date:



So, why the pineapple you may ask.

The pineapple has always been associated with wealth, prestige and luxury due to its exotic appearance. It first appeared in Britain in 1668, gaining notoriety when Charles II used it as part of a public relations opportunity. Pineapples have become known as a symbol for warm welcomes, celebration, and hospitality. Perfect on a pizza too.

Thanks for asking.

The details



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