

Privacy Policy.

Claritas Wealth are committed to protecting your privacy. However, you should recognise that your use of the Internet and our website or the Claritas client portal is entirely at your own risk. We will not pass your details to anyone outside except in accordance with this statement.

We collect information about you so we can provide you with the service you have entered into a contract with us to carry out.

We will never pass your personal data to anyone else, except for any successors in title to our business, without your explicit permission.

The policy

This privacy policy is for clients of Claritas Wealth at 10 Moorside Road, Heaton Moor, Stockport, Cheshire, SK4 4DT. It explains how we comply with the GDPR (General Data Protection Regulation), and the PECR (Privacy and Electronic Communications Regulations).

Your right to privacy is important to us. This policy will explain how we process, collect, manage and store those details and how your rights under the GDPR & PECR are adhered to. Additionally, it will explain the use of cookies or software, advertising or commercial sponsorship from third parties and the download of any documents, files or software made available to you (if any) on our website and/or Claritas WealthView client portal.

Our contact information is provided if you have any questions.

Personal data we collect about you

The type of personal data we collect about you and how it is used depends on what you contact you have with us, your needs, the relationship you have with us and the products and services you hold or enquire about.

We are committed to ensuring that your privacy is protected. When you provide certain information to us, it will only be used in accordance with this policy statement.

The information which we obtain about you includes your:

- Name;
- Address;
- Telephone number;
- Email address; and
- Any other contact details.
- Health details.
- Your cash deposits, investments, pensions, protection plans and other financial products.
- Your wills and Lasting Powers of Attorney.
- Current and expected future expenditure.
- Any information required to deliver a comprehensive financial planning service.

It can also include information which either you give to us or which we obtain about you. This is only gathered in connection with any products we provide to you.

We may also gather data from the use of our website 'contact us' form to enquire about products and services or register to receive one of our newsletters.

Sharing your personal information

Claritas Wealth Management will only share your personal data where data protection law allows it, with adequate protection and where appropriate will have contracts in place to protect the security and confidentiality of your data for the following purposes:

- To provide you with the information, products and services that you have requested from us.
- To meet a legal or regulatory obligation.
- To market our own products and services by mail and email in accordance with your communication preferences

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 direct marketing purposes.

We will not sell or distribute your personal data to other organisations.

Your individual rights

Requesting access to your personal data.

Under the data protection legislation, you have the right to request access to information held about you. Where you have provided your consent to the collection, processing and transfer of your personal data, you may withdraw that consent at any time. This will not affect the lawfulness of data processing based on consent before it is withdrawn. To withdraw your consent please contact Tim Walsham via email – tim@claritaswm.co.uk

You also have the right to:

- Object to processing of personal data that is likely to cause, or is causing, damage or distress
- Prevent processing for the purpose of direct marketing
- Object to decisions being taken by automated means
- In certain circumstances, have inaccurate personal data rectified, blocked, erased or destroyed.
- Receive a copy of the personal information you have provided to us or have this information be sent to a third party, this will be provided to you or the third party in a structured, commonly used and readable format
- Claim compensation for damages caused by a breach of the Data Protection regulations

Certain personal data will also be reported to government authorities where required by law and for tax or other purposes. We will not sell your personal data to any third party. We do not transfer personal data outside the EEA. If this is required in the future, we will ensure that safeguards are in place so that such transfers comply with data protection legislation.

Note that in relation to requests to access personal data, we reserve the right to charge a reasonable fee to comply with your request if we believe it is excessive. If not, then we will provide this free of charge.

If you have a concern about the way we are collecting or using your personal data, we request that you raise your concern with us in the first instance. Alternatively, you can contact the Information Commissioner's Office at <https://ico.org.uk/concerns/>.

Our Legitimate Interest

We hold a person's data under a **Legitimate interest** and will be held for as long as you remain a client of Claritas Wealth Management require us to continue within the original client terms of engagement. Due to the nature of the service we offer, it may be required for us to retain personal data even after an account has been closed for legal or operational reasons under the guidance of the FCA.

You have a right to challenge our legitimate interest if you believe we do not have a valid reason to collect, use, share or hold your data. You can withdraw your consent at any time. If you withdraw your consent for marketing you may miss out on information about our products, services, offers and other news that may be of interest to you. We will however continue to contact you regarding the administration of your existing accounts and relationship with us.

Contact information – Information used in marketing with your consent or to pursue a legitimate interest will be kept for 30 days once you have withdrawn your consent.

Storing Your Personal Data

When your data is stored on paper, it will be kept in a secure place where unauthorised people cannot see it.

- When we require the information that is kept on paper or in files, these will be locked in a drawer or in a filing cabinet.
- When it is no longer required, the paper or files will be shredded and dealt with as 'confidential waste'.
- Our employees should make sure paper and printouts are not left where unauthorised people could see them, like on a printer.

When your data is stored electronically, it must be protected from unauthorised access, accidental deletion and malicious hacking attempts:

- Data will be protected by strong passwords and never shared between employees.
- If your data is stored on removable media (like a CD or DVD), these should only be uploaded to an approved cloud computing services. When they are no longer required, they will be cleaned and destroyed in the manner described in our Data Protection Policy.
- Servers containing personal data should be sited in a secure location, away from general office space.
- Your data will be backed up frequently. Those backups should be tested regularly, in line with the company's standard backup procedures.
- Data will never be saved directly to laptops or other mobile devices like tablets or smart phones.
- All servers and computers containing data will be protected by approved security software and a firewall.

Downloads & Media Files

Any downloadable documents, files or media made available on this website and client portal are provided to users at their own risk. While all precautions have been undertaken to ensure only genuine downloads are available users are advised to verify their authenticity using third party anti-virus software or similar applications.

We accept no responsibility for third party downloads and downloads provided by external third-party websites and advise users to verify their authenticity using third party anti-virus software or similar applications.

Contact & Communication With us

Users contacting this us through this website and client portal do so at their own discretion and provide any such personal details requested at their own risk.

Email Mailing List & Marketing Messages

We operate an email mailing list program, used to inform subscribers about products, services and/or news we supply/publish. Subscriber personal details are collected, processed, managed and stored in accordance with the regulations named in 'The policy' above. Subscribers can unsubscribe at any time through an automated online service, or if not available, other means as detailed in the footer of sent marketing messages. The type and content of marketing messages subscribers receive, and if it may contain third party content, is clearly outlined at the point of subscription.

Email marketing messages may contain tracking beacons / tracked clickable links or similar server technologies in order to track subscriber activity within email marketing messages. Where used, such marketing messages may record a range of subscriber data relating to engagement, geographic, demographics and already stored subscriber data.

External Website Links & Third Parties

Although we only look to include quality, safe and relevant external links, users are advised to adopt a policy of caution before clicking any external web links mentioned throughout this website.

Shortened URL's; URL shortening is a technique used on the web to shorten URL's (Uniform Resource Locators) to something substantially shorter. This technique is especially used in social media and looks similar to this (example: <http://bit.ly/zyVUBo>). Users should take caution before clicking on shortened URL links and verify their authenticity before proceeding.

We cannot guarantee or verify the contents of any externally linked website despite our best efforts. Users should therefore note they click on external links at their own risk and we cannot be held liable for any damages or implications caused by visiting any external links mentioned.

Social Media Policy & Usage

We adopt a Social Media Policy to ensure our business and our staff conduct themselves accordingly online. While we may have official profiles on social media platforms users are advised to verify authenticity of such profiles before engaging with or sharing information with such profiles. We will never ask for user passwords or personal details on social media platforms. Users are advised to conduct themselves appropriately when engaging with us on social media.

There may be instances where our website features social sharing buttons, which help share web content directly from web pages to the respective social media platforms. You use social sharing buttons at your own discretion and accept that doing so may publish content to your social media profile feed or page. You can find further information about some social media privacy and usage policies in the resources section below.

Google Analytics

Your privacy is incredibly important to us, especially given the trust you place in us with your financial well-being. This section of our Privacy Policy is here to give you a clear, straightforward overview of how we handle your information when you visit our website. Like almost all websites today, we use common tools such as Google Analytics to understand how our site is being used – things like which pages are most popular or if you're browsing on a mobile. This helps us make our website better and more relevant for you. We want to assure you that any data collected, such as your IP address or general location, is used purely for these analytical purposes and to ensure our services are running smoothly and securely. This information is stored securely by Google, and we do not have access to the specific individualised details. We're committed to being transparent about this process and empowering you with choices regarding your data.

We may share your information with Google Analytics to track and analyse the use of the services. To opt out of being tracked by Google Analytics across the services visit <https://tools.google.com/dlpage/gaoptout>. For more information on the privacy practices of Google, please visit the Google privacy & terms page.

The information we collect includes:

- *Log and Usage Data.* Log and usage data is service-related, diagnostic, usage, and performance information our servers automatically collect when you access or use our Services and which we record in log files. Depending on how you interact with us, this log data may include your IP address, device information, browser type, and settings and information about your activity in the Services (such as the date/time stamps associated with your usage, pages and files viewed, searches, and other actions you take such as which features you use), device event information (such as system activity, error reports (sometimes called “crash dumps”), and hardware settings).
- *Device Data.* We collect device data such as information about your computer, phone, tablet, or other device you use to access the Services. Depending on the device used, this device data may include information such as your IP address (or proxy server), device and application identification numbers, location, browser type, hardware model, Internet service provider and/or mobile carrier, operating system, and system configuration information.
- *Location Data.* We collect location data such as information about your device’s location, which can be either precise or imprecise. How much information we collect depends on the type and settings of the device you use to access the Services. For example, we may use GPS and other technologies to collect geolocation data that tells us your current location (based on your IP address). You can opt out of allowing us to collect this information either by refusing access to the information or by disabling your Location setting on your device. However, if you choose to opt out, you may not be able to use certain aspects of the Services.

Review of this Policy

We reserve the right to update this privacy policy at any time, and any changes we make to our privacy policy will be posted on this page. We will notify you if there are any changes to this policy that materially affect how we collect, store or process your personal data.