



Data Privacy Notice

Together.
A better future.

We take your privacy very seriously and we ask that you read this privacy notice carefully as it contains important information on who we are, how and why we collect, store, use and share personal data, your rights in relation to your personal data and on how to contact us and supervisory authorities in the event you have a complaint.

Who we are

AFH Wealth Management collects, uses and is responsible for certain personal data about you. When we do so we are required to comply with data protection regulation, and we are responsible as a data controller of that personal data for the purposes of those laws.

AFH Wealth Management is a trading style of AFH Independent Financial Services Limited, a company registered in England and Wales (company number 04049180) whose registered office is at:

AFH House
Buntsford Drive
Stoke Heath
Bromsgrove
Worcestershire
B60 4JE

We are authorised and regulated by the Financial Conduct Authority. AFH Independent Financial Services Limited can be found on the Financial Services Register, number 216704.

AFH Independent Financial Services Limited is a wholly-owned subsidiary of AFH Financial Group Limited (company no: 07638831).

The personal data we collect and use

In the course of providing our service to you we may collect the following personal data when you provide it to us:

- contact information: including your title, full name, email address, home and mobile telephone numbers and correspondence address
- identity information: date of birth, Identification documents, national insurance number, nationality, tax residency
- financial information: bank details, financial information, mortgage / investment information,
- product details
- employment status
- lifestyle information.

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Some Special categories of personal data, such as:

- health information
- data about criminal convictions or offences
- details of any vulnerability
- details of your dependents and/or beneficiaries under a policy – **If you are providing information about another person, we expect you to ensure that they know you are doing so and are content with their information being provided to us. You might find it helpful to show them this privacy notice and if they have any concerns, please contact us in one of the ways described below.**

Information collected from other sources

We will generally collect your personal information from you directly. We also obtain personal data from other sources in the course of providing our intermediary services. Where we obtain this information from another party it is their responsibility to make sure they explain that they will be sharing personal data with us and, where necessary, ask permission before sharing information with us.

The personal data we obtain from other sources may include the following:

- from lenders and/or product providers:
 - product details
- from identification and verification checking agencies:
 - identity information
 - sanction check information.

How we use your personal data

The below table sets out how we use your personal data. In each of these instances we have determined that consent and legitimate interest form the lawful basis of collecting and using personal data.

| Rationale / Reason for Processing | Lawful Basis for Processing |
|--|--|
| <ul style="list-style-type: none">• For prospective clients who are enquiring about our services, products and discretionary services• Adviser engagement• Collecting data for the purpose of deciding if we can provide a service to yourself | <ul style="list-style-type: none">• Contract: where we use your personal information prior to the provision of our services for the purpose of establishing your preferred service and advice requirements and where it is necessary to meet the lawful basis of the contract between you and us |

| | |
|--|--|
| <ul style="list-style-type: none"> • To provide prospective clients with information on our products and services provided. | <ul style="list-style-type: none"> • Consent: During our initial meetings with you when enquiring about our services and products, we may gather information from you which may also include collecting any sensitive personal data. |
| <ul style="list-style-type: none"> • Provision of advisory, intermediary and discretionary services <ul style="list-style-type: none"> ○ Adviser engagement ○ To manage client's accounts with us ○ To complete transactions on client's behalf ○ To provide clients with information on advice, products and services provided ○ To process any payments ○ Product selection <p>In order to carry out our contractual obligations on the above we may routinely share personal data with product providers where necessary.</p> | <ul style="list-style-type: none"> • Contract: Where we use your personal information for the purposes of providing services, advice or assistance to you on the basis it is necessary to meet the requirements of the contract between us and the client • Legitimate Interests • Legal Obligation: We may collect data in line with our legal obligations such as monitoring and quality purposes in order to comply with a legal obligation. |
| <ul style="list-style-type: none"> • Anti-Money Laundering Requirements <ul style="list-style-type: none"> ○ To verify identity of clients ○ To verify address of clients. | <ul style="list-style-type: none"> • Legal Obligation: We may collect data in line with our legal obligations such as monitoring and quality purposes in order to comply with a legal obligation. |
| <ul style="list-style-type: none"> • Marketing <ul style="list-style-type: none"> ○ To contact clients with details of services offered by the AFH Group of companies ○ To write to clients about third party products or services that we may believe would be of interest. | <ul style="list-style-type: none"> • Consent: If we have gathered sensitive information about your circumstances to provide a service to you or retain your explicit consent for marketing preferences. |

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| <ul style="list-style-type: none"> • Visiting our offices: <ul style="list-style-type: none"> ○ CCTV cameras to capture images, in our offices. | <ul style="list-style-type: none"> • Legitimate Interest: our legal basis for using your personal information captured via CCTV for security reasons and employee safety or to verify information. |
| <ul style="list-style-type: none"> • Monitoring of your personal data <ul style="list-style-type: none"> ○ To monitor activities where we are required to do so by law ○ To fulfil our regulatory obligation to record certain types of telephone calls ○ To monitor and review data for training and monitoring purposes. | <ul style="list-style-type: none"> • Legal Obligation: We may collect data in line with our legal obligations such as monitoring and quality purposes in order to comply with a legal obligation • Legitimate Interests: to monitor quality and to take action on complaints or for training and monitoring purposes. |
| <ul style="list-style-type: none"> • Processing special category data such as health, criminal data, lifestyle data or if you are a vulnerable client. | <ul style="list-style-type: none"> • Consent: If we have gathered sensitive information about your circumstances in order to provide a service to you. • Vital interest: In line with the legislation we will collect or share data if we believe this meets the criteria to cover only the interests that are essential for someone's life. |
| <ul style="list-style-type: none"> • Collecting and processing data in line with our legal and regulatory requirements, such as providing information to our supervisory bodies and collecting data in line with our legal obligations, for example; Anti Money Laundering regulations or recording telephone conversations in line with the FCA legal obligation. | <ul style="list-style-type: none"> • Legal Obligation: We may collect data in line with our legal obligations such as monitoring and quality purposes we do in order to comply with our legal obligation. |
| <ul style="list-style-type: none"> • Collecting personal data via an AI transcription App, to provide summary meeting notes for client meetings. | <ul style="list-style-type: none"> • Consent: We will gather your explicit consent to collecting data via AI Transcription. This will include both normal and sensitive personal data. |

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 annuity products.

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 some circumstances we may process your data to protect the vital interests of a person or for a substantial public interest under laws that apply to us where this helps us to meet our broader social obligations or safeguard others, such as:

- processing of special categories of personal data such as about your health or if you are a vulnerable customer
- when we share your personal information with other people and organisations, such as your relatives, social services, your carer, the person who has control of your affairs e.g. power of attorney, court appointed deputy, someone with parental responsibility, if they need to know that you are a vulnerable customer; and
- When we share your personal information with other organisations to help prevent and detect fraud or financial crime.

Marketing

We may use personal data we hold about you to 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 obtained your consent 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: 01527 577 775

By email: privacy@afhgroup.com

By Post: AFH House
Buntsford Drive
Stoke Heath
Bromsgrove
Worcestershire
B60 4JE

How and when can you withdraw your consent?

Much of what we do with your personal information is not based on your consent, instead it is based on other legal grounds as outlined above. For processing that is based on your consent, you have the right to take back that consent for future processing of any time. You can do this by contacting us using the details above. It is important to remember, when withdrawing consent that you will not receive any marketing from us or any data may not be processed if we are using consent for the legal basis for processing. If you wish to withdraw your consent, please contact us at;

By phone: 01527 577 775

By email: privacy@afhgroup.com

By Post: AFH House
Buntsford Drive
Stoke Heath
Bromsgrove
Worcestershire
B60 4JE

Cookies

When you visit the AFH website we may use a short text file called a 'cookie' which is downloaded to your computer. Many websites do this, because cookies facilitate useful features such as the ability to identify whether a user has successfully logged into the site or to find out whether the computer (and probably its user) has visited the website before.

During the course of your visit, we (and our service providers) may use cookies and other technologies to automatically collect the following information:

Technical information, including your IP address, your login information, browser type and version, device identifier, location and time zone setting, browser plug-in types and versions, operating system and platform, page response times and download errors;

Information about your visit, including the websites you visit before our website and the components of our website you viewed during your visit; the number of visits, length of visits to certain pages, pages viewed, page interaction information (such as scrolling, clicks and mouseovers) and methods used to browse away from the page; and similar information for additional content that can be accessed from website pages, such as opening or printing pages or documents.

Your personal information is important to us and will be used solely by us. Under no circumstances will your personal information be sold or used by any other organisation.

If you wish to find out further information on how we process your data please go to our cookie policy [here](#).

Whether information has to be provided by you and how we share your information

We will tell you if providing some personal data is optional, including if we ask for your consent to process it. In all other cases, you must provide your personal data in order for us to provide you with intermediary services.

In order to, provide you with our services and comply with our legal obligations, we need to share your personal data with others. We have listed examples above, of who we need to share your personal information with and why this is necessary. Whenever we share your data, we require all third parties to respect the security of your personal data and to treat it in accordance with the law.

Some of the organisations we share your data and act as either a controller of the information or act as processors of your information. Processors are not allowed to use your personal data for their own purposes and can only process your personal data for the reasons it was collected. If they are a controller of the information, this means they will need to determine themselves how to use your personal information lawfully.

How long your personal data will be kept

We will hold your personal data for differing periods of time depending upon the reason we have for processing it. These retention periods are set out below.

We will usually retain your information for a period of up to 9 years from the point at which AFH are no longer deemed to be your servicing agent, dependent upon the type of product you have been advised upon.

If you are unsure of who your servicing agent is, you can contact us or alternatively speak to your provider.

Where we have provided you with advice or services relating to pensions transfers, conversions, opt-outs of Free-Standing Additional Voluntary Contribution Schemes, we may retain your information indefinitely in order to comply with our legal and regulatory obligations in relation to these products.

International Transfers

We are based in the United Kingdom; however, some of our service providers are located outside the UK. As a result, your personal data may be transferred to countries outside the UK.

Where we transfer personal data internationally, we ensure that appropriate safeguards are in place to protect your information in accordance with UK data protection law. These safeguards may include:

- Transfer to countries that have been deemed to provide an adequate level of protection by the UK Government; or
- The use of approved contractual mechanisms, such as the UK International Data Transfer Agreement (IDTA) or Standard Contractual Clauses.

We also carry out transfer risk assessments to evaluate whether the laws and practices in the recipient country may affect the level of protection for your personal data.

Further details about the countries to which your data may be transferred, and the safeguards we use, can be obtained by contacting us.

What should you do if your personal information changes?

You should tell us without delay, so that we can update our records. So that we can maintain accurate records of your personal data. We are unable to provide you with our services, without accurate records of your personal information. Your personal information is required before you can enter into the relevant contract with us, or it is required during the life of that contract, or it is required by laws that apply to us.

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 understand how we protect information transferred outside Europe

- to find out more about how we use personal data.

We may ask you for proof of identity when making a request to exercise any of these rights. We do this to ensure we only disclose information or change your details where we know we are dealing with the right individual.

We will not ask for a fee other than in exceptional circumstances.

We aim to respond to all valid requests as quickly as possible. We will always let you know if we think a response will take an extended period of time. To speed up our response, we may ask you to provide more detail about what you want to receive or are concerned about.

We may not always be able to fully address your request, for example if it would impact the duty of confidentiality we owe to others, or if we are otherwise legally entitled to deal with the request in a different way.

To access personal data

You can ask us to confirm whether or not we have and are using your personal data. You can also ask to get a copy of your personal data from us and for information on how we process it.

To rectify / erase personal data

You can ask that we rectify any information about you which is incorrect. We will be happy to rectify such information but would need to verify the accuracy of the information first.

You can ask that we erase your personal data if you think we no longer need to use it for the purpose we collected it from you.

You can also ask that we erase your personal data if you have either withdrawn your consent to us using your information (if we originally asked for your consent to use your information), or exercised your right to object to further legitimate use of your information, or where we have used it unlawfully or where we are subject to a legal obligation to erase your personal data.

We may not always be able to comply with your request, for example where we need to keep using your personal data in order to comply with our legal obligation or where we need to use your personal data to establish, exercise or defend legal claims.

To restrict our use of personal data

You can ask that we restrict our use of your personal data in certain circumstances, for example:

- where you think the information is inaccurate and we need to verify it;

- where our use of your personal data is not lawful but you do not want us to erase it;
- where the information is no longer required for the purposes for which it was collected but we need it to establish, exercise or defend legal claims; or
- where you have objected to our use of your personal data but we still need to verify if we have overriding grounds to use it.

We can continue to use your personal data following a request for restriction where we have your consent to use it; 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.

To object to use of personal data

You have the right to ask us to review and explain our legitimate interests to you where we are collecting, storing and using your personal data on a legitimate interest basis, including where we collecting, storing and using for profiling or by automated means. You have the right to object to our legitimate interests and that collection, storage and use unless we can demonstrate that we have compelling legitimate interests to use the personal data. You also have the right to object to us sending you marketing communications as stated above.

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To request a transfer of personal data

You can ask us to provide your personal data to you in a structured, commonly used, machine-readable format, or you can ask to have it transferred directly to another data controller (e.g. another company).

You may only exercise this right where we use your personal data in order to perform a contract with you, or where we asked for your consent to use your personal data. This right does not apply to any personal data which we hold or process outside automated means.

Security and Data Privacy

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. You can ask for a copy of, or reference to, the safeguards we have put in place when your personal data is transferred outside of the European Economic Area. We are not required to share details of these safeguards where sharing such details would affect our commercial position or create a security risk.

Some of the measures we use are:

- ensuring all IT facilities are protected
- ensuring security of our website and portals

- training and procedures are provided to staff, ensuring that understanding and responsibility of our staff to protect the confidentiality of personal data and how they handle the information
- ensuring appropriate procedures and policies are in place to support staff with handling personal data and how to handle suspected data security breaches.

Use of Artificial Intelligence and advancing technologies

With the ever-changing advancements in technology and the introduction of artificial intelligence (AI), we continually explore new avenues of innovation to enhance our services and operations for our clients. Our commitment to adopting cutting edge tools is balanced by a rigorous approach to data protection and privacy.

We investigate a broad range of advancing technologies, which may include:

- machine learning and predictive analytics
- natural language processing and conversational agents
- automated decision-making systems
- process automation and intelligent workflows

All evaluation and deployment of these technologies adhere to UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018. Prior to introduction any new system that processes personal data, we carry out a Data Protection Impact Assessment (DPIA) to identify and mitigate privacy risks.

Where a new technology entails high risk processing, we will seek your explicit consent or rely on another legal basis for processing under UK GDPR and this will be detailed in our privacy notice.

We regularly review our use of emerging technologies, updating this privacy notice and our internal policies to reflect legal developments and best practices. If you have any questions on how we handle your personal data in connection with AI, please contact our Data Protection Officer.

You can contact us for more information

If you are not satisfied with the level of information provided in this privacy notice, you can ask us about what personal data we have about you, what we use your information for, who we disclose your information to, whether we transfer it abroad, how we protect it, how long we keep it for, what rights you have, how you can make a complaint, where we got your data from and whether we have carried out any automated decision making using your personal data.

If you would like to exercise any of the above rights, please:

- email or write to our Data Protection Officer at: privacy@afhgroup.com or:

AFH House
Buntsford Drive
Stoke Heath
Bromsgrove
Worcestershire
B60 4JE

- let us have enough information to identify you, e.g. name, address, date of birth.
- let us have proof of your identity and address (a copy of your driving licence or passport and a recent utility or credit card bill); and
- let us know the information to which your request relates.

Complaints

If you have any concerns about how we handle your personal data, if you wish to contact our Data Protection Officer, please send an email to privacy@afhgroup.com or write to:

AFH House
Buntsford Drive
Stoke Heath
Bromsgrove
Worcestershire
B60 4JE

If you are not happy with the way we are handling your information, you have a right to lodge a complaint with the Information Commissioners Office (ICO). It has enforcement powers and can investigate compliance with data protection regulation (www.ico.org.uk).

We would, however, appreciate the chance to deal with your concerns before you approach the ICO and so, if you are happy to do so, please contact us in the first instance and we will try to resolve your complaint.

- **Website:** www.ico.org.uk
- **Telephone:** 0303 123 1113
- **Post:** Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

Do we do any monitoring that involves processing of your personal information?

We may monitor where permitted by law and we will do this where the law requires it. In particular where we are required by the Financial Conduct Authority's regulatory regime to record certain telephone lines or in person meetings (as relevant) we will do so.

Some of our monitoring may be to comply with regulatory rules, self-regulatory practices or procedures relevant to our business, to prevent or detect crime, in the interests of protecting the security of our communications systems and procedures and for quality control and staff training purposes.

Keeping your personal data secure

We have appropriate security measures in place to prevent personal data from being accidentally lost, or used or accessed in an unauthorised way. We limit access to your personal data to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

How to contact us

Please contact our Data Protection Officer if you have any questions about this privacy notice or the information we hold about you.

If you wish to contact our Data Protection Officer, please send an email to privacy@afhgroup.com or write to:

AFH House
Buntsford Drive
Stoke Heath
Bromsgrove
Worcestershire
B60 4JE

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