

# Coloma Wealth Management

## Privacy Notice

This privacy notice explains how we use any personal information we collect about you.

### What information do we collect about you?

We collect information about you when you approach and engage us for financial planning/financial advice/mortgage advice/investment services. This information will relate to your personal and financial circumstances. It may also include special categories of personal data such as data about your health, if this is necessary for the provision of our services.

We may also collect information when you voluntarily complete client surveys or provide feedback to us.

### Information about connected individuals

We may need to gather personal information about your close family members and dependants in order to provide our service to you effectively. In such cases it will be your responsibility to ensure that you have the consent of the people concerned to pass their information on to us. We will provide a copy of this privacy notice for them or, where appropriate, ask you to pass the privacy information to them.

### Why do we need to collect and use your personal data?

The primary legal basis that we intend to use for the processing of your data is for the performance of our contract with you. The information that we collect about you is essential for us to be able to carry out the services that you require from us effectively. Without collecting your personal data we would also be unable to provide you with our services or fulfil our legal and regulatory obligations.

Where “special category” health or lifestyle data is required, we will obtain your explicit consent in order to collect and process this information.

### How will we use the information about you?

We collect information about you in order to provide you with the services for which you engage us.

### Who might we share your information with?

**If you agree**, we may send you e mails about other products or services that we think may be of interest to you.

We will not share your information for **marketing** purposes with other organisations outside our company.

In order to deliver our services to you efficiently, we may share your details with third parties such as those that we engage for compliance advice, accountancy or legal services, as well as product and platform providers that we use to arrange financial products for you.

Where third parties are involved in processing your data we will have a contract in place with them to ensure that the nature and purpose of the processing is clear, that they are subject to a duty of care and confidence in processing your data, and that they will only act in accordance with our written instructions.

Where it is necessary for your personal data to be forwarded to a third party we will use appropriate security measures to protect your personal data in transit. This includes for example, secure, encrypted, messaging services or using other means of protecting such as using passwords to protect documents from unauthorised access.

To comply with UK Money Laundering rules to prevent money-laundering and other financial crime, we may refer your details to third party agencies to verify your identity.

### How long do we keep hold of your information?

During the course of our relationship with you we will retain personal data which is necessary to provide services to you. We will also take all reasonable steps to keep your personal data up to date throughout our relationship.

In principle, your personal data should not be held for longer than is required under the terms of our contract for services with you. However, we are subject to regulatory requirements to retain data for specified minimum periods. These are, generally:

- 5 years for investment business
- 3 years for mortgage and insurance business
- Indefinitely for pension transfers and opt-out business

We also reserve the right to retain data for longer than this due to the possibility that it may be required to defend a future claim against us. In any case, we will not retain your personal data for longer than necessary normally up to 6 years after our relationship with you has ended, unless we have advised you to transfer your pension to an alternative provider. In this case we are bound by the Financial Conduct Authority to retain the records relating to your pension transfer indefinitely.

You have the right to request deletion of your personal data. We will comply with this request wherever possible, subject to the restrictions of our regulatory obligations and legitimate interests as noted above.

### How can I access the information you hold about me?

You have the right to request a copy of the information that we hold about you. If you' would like a copy of some or all of your personal information, please send an e mail or write to us using the contact details noted below.

When your personal data is processed by automated means you have the right to ask us to move your personal data to another organisation for their use.

We have an obligation to ensure that your personal information is accurate and up to date. Please ask us to correct or remove any information that is incorrect.

### Marketing

We would like to send you information about our services which may be of interest to you. If you have agreed to receive marketing information, you may opt out at a later date.

You have a right at any time to stop us from contacting you for marketing purposes. If you no longer wish to be contacted for marketing purposes, please contact us by e mail or post, using the details below.

### What can you do if you are unhappy with how your personal data is processed?

You also have a right to lodge a complaint with the supervisory authority for data protection. In the UK this is:

**Information Commissioner's Office**  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

## Changes to our privacy policy

We keep our privacy policy under regular review and we will place any updates on this web page (and/or) inform you of any changes when they occur. This privacy policy was last updated on 1/9/2021.

## How to contact us

Please contact us if you have any questions about our privacy policy or information we hold about you:

By email at [GDPR@coloma-wealth.com](mailto:GDPR@coloma-wealth.com).

Or write to us:

**Edward Dolan-Abrahams, Managing Partner**  
**Data Controller**  
**5<sup>th</sup> floor Pinnacle House**  
**St Dunstan's Hill**  
**London EC3R 8HN**