ASPIRE WEALTH MANAGEMENT

Customer Privacy Notice

INDEPENDENT | HOLISTIC | CHARTERED

CUSTOMER PRIVACY NOTICE

Aspire Wealth Management Ltd is a part of Satus Capital Ltd. This privacy notice explains how we use any personal information we collect about you.

During the course of our relationship, we will ask you to provide us with detailed personal information relating to your circumstances, your financial situation and, in some cases, your health and family health history **(Your Personal Data).**

The following sections are important as they explain what we will need to do with Your Personal Data and the various rights you have.

WHAT DO WE MEAN BY "YOUR PERSONAL DATA"?

Your Personal Data means any information that describes or relates to your personal circumstances. Your Personal Data may identify you directly, for example your name, address, date of birth, or National Insurance number.

Your Personal Data may also identify you indirectly, for example, your employment situation, your physical and mental health history, or any other information that could be associated with your cultural or social identity.

In the context of assisting you in relation to your investment and / or insurance requirements, Your Personal Data may include:

- Title, names, date of birth, gender, nationality, civil/marital status, contact details, addresses 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 dependants.
- Health status and history, details of treatment and prognosis, medical reports (further details are provided below specifically with regard to the processing we may undertake in relation to this type of information).
- Any pre-existing investment, mortgage, finance and / or insurance products and the terms and conditions relating to these.

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.

THE BASIS UPON WHICH WE WILL DEAL WITH YOUR PERSONAL DATA

When we speak with you about your investments and / or insurance requirements, we do so on the basis that both parties are entering a contract for the supply of services.

In order to perform that contract, and to arrange the products you require, we have the right to use Your Personal Data for the purposes detailed below.

Alternatively, either in the course of initial discussions with you or when the contract between us has come to an end for whatever reason, we have the right to use Your Personal Data as long it is in our legitimate business interest to do so, and your rights are not affected. For example, we may need to respond to requests from investment or insurance providers or our Compliance Service Provider relating to the advice we have given to you, or to contact you to seek feedback on the service you received.

On occasion, we will use Your Personal Data for contractual responsibilities we may owe our regulator, The Financial Conduct Authority, or for wider compliance with any legal or regulatory obligation to which we might be subject. In such circumstances, we would be processing Your Personal Data in order to meet a legal, compliance or other regulatory obligation to which we are subject.

THE BASIS UPON WHICH WE WILL PROCESS CERTAIN PARTS OF YOUR PERSONAL DATA

Where you ask us to assist you with, for example, your insurance or ethical investments, in particular life insurance and insurance that may assist you in the event of an accident or illness, we will ask you information about your ethnic origin and your health and medical history (Your Special Data).

We will record and use Your Special Data to make enquiries of insurance and / or investment providers in relation to solutions that may meet your needs, and to provide you with advice regarding the suitability of any solution that may be available to you.

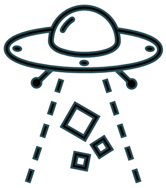
If you have parental responsibility for children under the age of 13, it is also very likely that we will record information on our systems that relates to those children and potentially, to their Special Data.

The arrangement of certain types of insurance may involve disclosure by you to us of information relating to historic or current criminal convictions or offences (together "Criminal Disclosures"). This is relevant to insurance related activities such as underwriting, claims and fraud management.

We will use special Data and any Criminal Disclosures in the same way as Your Personal Data generally, as set out in this Privacy Notice.

Information on Special Category Data and Criminal Disclosures must be capable of being exchanged freely between insurance intermediaries, such as Aspire Wealth Management, and insurance providers, to enable customers to secure the important insurance protection that their needs require.

HOW DO WE COLLECT YOUR PERSONAL DATA?



We will collect and record Your Personal Data from a variety of sources, but mainly directly from you. You will usually provide information during the course of our initial meetings or conversations with you to establish your circumstances, needs and preferences in relation to investments and / or insurance. You will provide information to us verbally and in writing, including email.

We may also obtain some information from third parties, for example, credit checks, information from your employer, and searches of information in the public domain such as the voter's roll.

If we use technology solutions to assist in the collection of Your Personal Data, for example, software that is able to verify your credit status, we will only do this if you have consented to us or our nominated processor accessing your information in this manner.

We may also use technology solutions to perform electronic ID checks. We would not require your consent for this, but will inform you of how such software operates and the purpose for which it is used.

WHAT HAPPENS TO YOUR PERSONAL DATA WHEN IT IS DISCLOSED TO US?

In the course of handling Your Personal Data, we will:

- Record and store Your Personal Data in our paper files, mobile devices and on our computer systems (*websites, email, hard drives, and cloud facilities*). This information can only be accessed by our employees and advisers, and only when it is necessary to provide our service to you and to perform any administration tasks associated with or incidental to that service.
- Submit Your Personal Data to Product Providers and / or Insurance Providers, both in paper form and on-line via a secure portal. The provision of this information to a third party is essential in allowing us to progress any enquiry or application made on your behalf and to deal with any additional questions or administrative issues that lenders and providers may raise.
- Use Your Personal Data for the purposes of responding to any queries you may have in relation to any investment and / or insurance policy you may take out, or to inform you of any developments in relation to those products and / or polices of which we might become aware.

SHARING YOUR PERSONAL DATA

From time to time, your Personal / Special Data will be shared with:

- Investment Providers and / or insurance providers.
- Third parties who we believe will be able to assist us with your enquiry or application, or who are able to support your needs as identified. These third parties may include but are not be limited to, our Compliance Advisers, Product specialists, providers of legal services such as estate planners (in each case where we believe this to be required due to your particular circumstances).

In each case, your Personal Data will only be shared for the purposes set out in this customer privacy notice, i.e. to progress your investment and / or insurance enquiry and to provide you with our professional services.

Please note that this sharing of Your Personal Data does not entitle such third parties to send you marketing or promotional messages: it is shared to ensure we can adequately fulfil our responsibilities to you, and as otherwise set out in this Customer Privacy Notice.

We do not envisage there will be a requirement for Your Personal Data to be transferred outside of the European Economic Area to enable us to perform our service.

SECURITY & RETENTION OF YOUR PERSONAL DATA

Your privacy is important to us, and we will keep Your Personal Data secure in accordance with our legal responsibilities. We will take reasonable steps to safeguard Your Personal Data against it being accessed unlawfully or maliciously by a third party.

We also expect you to take reasonable steps to safeguard your own privacy when transferring information to us, such as not sending confidential information over unprotected email, ensuring email attachments are password protected or encrypted and only using secure methods of postage when original documentation is being sent to us.

Your Personal Data will be retained by us either electronically or in paper form for a minimum period of 6 years following the advice / service you receive from us, although your data could be held for a longer period where this may be needed to meet the requirements of our regulatory bodies.

YOUR RIGHTS IN RELATION TO YOUR PERSONAL DATA

You have the right to:

- Request copies of Your Personal Data that is under our control.
- Ask us to further explain how we use Your Personal Data.
- Ask us to correct, delete or require us to restrict or stop using our Personal Data (details as to the extent to which we can do this will be provided at the time of any such request).
- Ask us to send an electronic copy of Your Personal Data to another organisation should you wish.
- Change the basis of any consent you may have provided to enable us to market to you in the future (including withdrawing any consent in its entirety).

MARKETING

We would like to send you information about our products and services and those of other companies in our group 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 or giving your information to other members of the group. If you no longer wish to be contacted for marketing purposes, please contact us by email or post.

COOKIES

Information relating to usage of our website is collected using cookies. These are text files placed on your computer to collect standard internet log information and visitor behaviour information. We will use your information collected from the website to personalise your repeat visits to the site.

We use cookies to track visitor use of the website and to compile statistical reports on website activity.

For further information visit http://www.allaboutcookies.org/

You can set your browser not to accept cookies and the above website tells you how to remove cookies from your browser. However, in a few cases some of our website features may not function as a result.

OTHER WEBSITES

Our website may contain links to other websites. This privacy policy only applies to our website so when you link to other websites you should read their own privacy policies.

HOW TO MAKE CONTACT WITH US 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 us via email at info@aspireifa.co.uk or write to us at the following address:

Aspire Wealth Management

21 Lansdown Crescent

Edinburgh

EH12 5EH

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 make contact with us as soon as possible if you become aware of any unauthorised disclosure of Your Personal Data, so that we may investigate and fulfil our own regulatory obligations.

If you have any concerns or complaints as to how we have handled Your Personal Data you may lodge a complaint with the UK's data protection regulator, the Information Commissioner's Office (ICO), who can be contacted through their website at https://ico.org.uk/global/contact-us/ or by writing to Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.

To agree to the terms laid out in this document, please sign and return the Data Subject Consent Form and Marketing Consent on the following pages.

CONTACT US

Address: 21 Lansdowne Crescent, Edinburgh, EH12 5EH

Email: info@aspireifa.co.uk

Telephone: 0131 535 1100

Website: **www.aspireifa.co.uk**

Please speak to your adviser if you would like to receive this document in an alternative format.