

VINCO WEALTH MANAGEMENT PRIVACY POLICY

www.vincowealth.co.uk (the “Website”) is owned and operated by Vinco Wealth Management Limited (8692727) of registered office Highview House, 1st Floor, Tattenham Crescent, Epsom Downs, KT18 5QJ, company number (we, us and our).

We are authorised and regulated by the Financial Conduct Authority.

We are committed to preserving the privacy of Our clients, investors and any individual with whom we have a relationship in the course of Our business directly or through this Website (“You”).

Any personal information that we process about you will be dealt with in accordance with this privacy policy (Privacy Policy). If we provide services or products to you, we shall provide you separately with any applicable terms and conditions that are to apply.

1. Data protection

1.1 For the purposes of the Data Protection Act 2018 and the General Data Protection Regulation (Regulation (EU) 2016/679) as amended from time to time (together, the data protection legislation) Vinco Wealth Management Limited is the data controller of your personal data as defined in the Data Protection Legislation.

We are registered with the Information Commissioner's Office (the ICO) under registration number ZA164065.

1.2 In accordance with data protection legislation we are required to collect and process your personal information lawfully, fairly and in a transparent manner. This includes providing you with the information set out in this Privacy Policy.

1.3 Our appointed Data Protection lead contact is Mark Vincent, CEO, and he can be contacted at compliance@vincowealth.co.uk

2. What personal information do we collect and how do we collect it?

2.1 Personal data means any information from which you can be identified, whether directly or indirectly.

2.2 We collect a variety of personal information about you, including:

- Personal identity data such as your title, name, date of birth, gender, residential and employment details;
- Financial information, such as bank account details and income and expenditure;
- Contact information such as your address, place of business or employment, email and telephone contact numbers;
- records of all correspondence with you, including any call recordings (where we are required or entitled by law or regulation to make such recordings); and
- Any other information that you provide to us.

Please note that we require certain personal information to be able to provide you with our services or products. If you do not provide such information, this may limit our ability to do so.

We may ask you to provide information that contains special categories of personal data about you (for example, your health information). In such cases we will obtain your express consent to process the information.

If you volunteer information to us that contains special categories of personal data you will be regarded as giving your explicit consent to us processing it. We will always seek to confirm with you that this is the case.

Where you provide personal information to us about other individuals (for example, members of your family or other dependants) we will also be the data controller of their personal information and we are responsible for protecting their data and using it appropriately. You agree only to pass us such personal information where you have obtained consent of the individual concerned and you will ensure that the individual reads, understands and accepts the terms of this Privacy Policy.

Subject to compliance with Data Protection Legislation and applicable law we may process personal information relating to criminal convictions or offences as a result of our fraud prevention searches.

2.3 We will collect personal information:

Directly from you, for example:

- through information provided in completion of our forms, whether submitted on our Website, electronically or in person; and
- in correspondence with you and in our dealings with you, whether in person, by telephone or online.

Indirectly, for example from:

- our agents and intermediaries, or other introducers such as financial advisors;
- credit reference agencies (CRAs) or fraud prevention agencies (FPAs) from their records relating to you and other people with whom you are linked financially;
- any person that provides your information to us (for example, a member of your household in seeking to obtain a product or service from us); and
- publicly available sources, such as Companies House and social media sites.

3. Why do we collect your personal information and on what lawful grounds?

3.1 We process your personal information for a number of reasons connected with the provision of investment management and stockbroking services. These include:

- understanding your circumstances and verifying your identity before we offer you a service or product;
- administering and managing any account you have with us;
- communicating with you, including to send marketing to you by post and email in respect of services and products which we feel will be of interest to you (unless you have opted out of receiving such marketing communications);
- maintaining and improving the Website; and

- reporting to our regulator, the Financial Conduct Authority (FCA), or any other regulatory or enforcement body or government agency as required by law.

3.2 The lawful bases that we rely upon in order to process your personal information are that the processing is necessary:

- for the performance of any contract we enter into with you or to take steps at your request prior to entering into a contract with you;
- in order to comply with our legal obligations;
- to fulfil our legitimate interests, including, of:
 - ensuring that we provide you with responsible advice and appropriate services and products;
 - seeking to prevent fraud and money laundering; and
 - providing you with an excellent standard of service, which includes providing you with information about services or products, investment news & opportunities, invitations to seminars & events and publications & newsletters that we feel will be of interest to you.

3.3 Where we send marketing communications by email, and where required we will obtain your consent. Where you have provided consent please note that you may withdraw it at any time. This shall not affect the lawfulness of any processing that was based on your consent before you withdrew it.

3.4 If you do not wish to receive marketing communications from us, you may opt out at any time. You can send an email to info@vincowealth.co.uk or write to us at the address below.

4. Who will we share your personal information with?

4.1 In providing our services to you as described above, we may disclose your personal information to the following third parties:

- regulatory bodies and enforcement agencies
- government agencies, such as HMRC, and the London Stock Exchange
- credit reference agencies and fraud prevention agencies third parties who we engage to provide services to us.

4.2 We will ensure that appropriate data processing agreements are in place as appropriate to protect the confidentiality and security of your information.

5. Storage and transfer of your personal data

5.1 All information you provide to us is stored on secure servers within the UK. We do not systematically transfer your personal data outside the European Economic Area (EEA).

5.2 If you hold shares overseas we may transfer personal information relating to your shareholding to the location in which they are held. We do so on the basis that the transfer is necessary for the performance of the contract that we have with you or the implementation of pre-contractual measures taken at your request, or that it is necessary for the conclusion or performance of a contract concluded in your interest.

5.3 Should we need to transfer your personal information to a country outside of the EEA we will take all reasonable steps as necessary to hold the data securely and in accordance with this Privacy Policy, in particular by putting in place appropriate technical and organisational safeguards.

6. Retention of your personal data

We will retain your personal information for as long as we need to in order to fulfil the relevant purpose(s) it was collected for, as set out above in this Privacy Policy, unless we are required to keep it for a longer period by law or regulation or we have legitimate reasons for doing so.

If you do not have an account with us but you have agreed to receive marketing from us we will hold your contact details for marketing purposes unless you request otherwise.

7. What are your data protection rights?

7.1 You have specific rights in respect of the personal information that we process about you.

7.2 Your rights include:

- The right of access to the personal data we hold about you.
- The right to rectify (i.e. correct) your personal data where it is inaccurate or incomplete.
- The right to delete your personal data, but only in specific circumstances, for example where the personal data are no longer necessary in relation to the purpose for which it was originally collected or processed. It may not therefore always be possible for us to delete the information we hold about you if you request this, for example, if we have an ongoing contractual relationship with you.
- The right to restrict processing in specific circumstances, for example while we are reviewing the accuracy or completeness of data, or deciding on whether any request for erasure is valid. In such cases we shall continue to store the data, but not further process it until such time as we have resolved the request.
- The right to data portability which means the right to receive, move, copy or transfer your personal data to another controller. You have the right to this when we are processing your personal information based on consent or on a contract and the processing is carried out by automated means.
- The right to object to processing in cases where processing is based upon our legitimate interests or where processing is for direct marketing purposes (including profiling).
- The right to lodge a complaint with the Information Commissioner's Office (see below).

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your relationship with us.

7.3 Please write to compliance@vincowealth.co.uk if you would like to exercise any of your data protection rights or if you have any queries in respect of your rights.

8. Changes to this privacy policy

We may edit or amend this Privacy Policy from time to time in which case we shall publish the amended version on our Website. We will inform you should we process your personal information for a purpose other than the purpose for which it was obtained.

9. Links to other websites

This Privacy Policy does not extend to your use of, provision of data to or collection of data on any website to which you may link by using the hypertext links within this Website. You are therefore encouraged to read the privacy policies of other websites you may visit.

10. Contacting us

If you have any questions about our Privacy Policy or any other aspect of the Website please contact us at:

Vinco Wealth Management Limited

County House, St. Mary's Street, Worcester WR1 1HB

Telephone: 020 7412 8907

E-mail: info@vincowealth.co.uk

Office Opening Times: 8am - 5pm, Monday to Friday.

Please note that you can complain to our supervisory authority, the ICO by telephoning 0303 123 113 or writing to Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF. For further information, the ICO's website can be accessed at www.ico.org.uk.

Last updated: November 2018