

## VINCO WEALTH MANAGEMENT PRIVACY NOTICE

Welcome to the Privacy Notice of Vinco Wealth Management Limited (company number: 08692727) of registered office Highview House, 1<sup>st</sup> Floor, Tattenham Crescent, Epsom Downs, KT18 5QJ.

We are authorised and regulated by the Financial Conduct Authority (“FCA”) and are registered with the Information Commissioner's Office (“ICO”) under registration number ZA164065.

This Privacy Notice applies to all website users, candidates and prospective and existing clients, partners and third parties that engage with us. We are committed to preserving the privacy of any individuals with whom we have a relationship in the course of our business. Any personal data that we process about you will be dealt with in accordance with this Privacy Notice.

### **1. Data protection legal requirements**

Vinco Wealth Management Limited complies with the European Union’s General Data Protection Regulation 2016/679 (“EU GDPR”) and the UK GDPR. The UK GDPR is the UK’s version of the EU GDPR and comprises of the Data Protection Act 2018 and the Data Protection, Privacy and Electronic Communications (Amendments etc) (EU Exit) Regulations 2019 (SI 2019/419)). Any reference to “Data Protection Legislation” throughout this Privacy Notice refers to the EU GDPR and UK GDPR.

Vinco Wealth Management Limited is a “data controller” of your personal data as defined in Data Protection Legislation. In accordance with Data Protection Legislation, we are required to collect and process your personal data lawfully, fairly and in a transparent manner. This includes providing you with the information set out in this Privacy Notice.

### **2. What personal data do we collect?**

Personal data means any information from which you can be identified whether directly or indirectly. It does not include data where your identity has been removed (as this would be anonymous data).

While the personal data that we collect from you depends on our relationship with you, in general, we collect, store and process a variety of personal data including:

- website usage data such as your internet protocol address;
- 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 data 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 data 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 data to us about other individuals (for example, members of your family or other dependants) we will also be the data controller of their personal data and as such we will protect their data and use it appropriately. You agree only to pass us such personal data where you have obtained consent of the individual concerned and you will ensure that the individual reads and understands the terms of this Privacy Notice.

Subject to compliance with Data Protection Legislation and applicable law we may process personal data relating to criminal convictions or offences as a result of our fraud prevention searches. We only obtain and process this data when we have a lawful basis in which to do so (e.g., consent has been given to us by the individual concerned).

### **3. How do we collect personal data?**

We collect personal data either directly from you or indirectly through third parties.

We collect it directly from you, for example, in the following situations:

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

We collect it indirectly from third parties, for example, in the following situations:

- our agents and intermediaries, or other introducers such as financial advisors;
- credit reference agencies or fraud prevention agencies 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 websites.

As it is important that the personal data we hold about you is accurate and current, we request that in the instances where you provide us with your personal data directly, that you keep us informed of any changes.

### **4. Why do we collect your personal data and on what lawful grounds?**

We process your personal data 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 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 our website; and
- reporting to our regulator, the FCA, or any other regulatory or enforcement body or government agency as required by law.

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

- for the performance of any contract we enter into with you or to take steps 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 our website and appropriate services and products;
  - seeking to prevent fraud and money laundering; and
  - providing you with information about services or products, investment news and opportunities, invitations to seminars and events and publications and newsletters that we feel will be of interest to you.

We will inform you should we process your personal data for a purpose other than the purpose for which it was obtained, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose.

#### **5. Who do we share your personal data with?**

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

- software companies that provide us with desktop and/or cloud-based products (such as Dropbox and Adobe);
- electronic trading platforms that we use (such as those offered by Saxo Capital Markets UK and City Index);
- regulatory bodies and enforcement agencies (such as the FCA);
- government agencies (such as HMRC, and the London Stock Exchange); and
- credit reference agencies and fraud prevention agencies' third parties who we engage to provide services to us.

#### **6. How do we protect your personal data when shared with others and/or transferred outside of the European Economic Area ("EEA") and/or the United Kingdom ("UK")?**

We have put in place appropriate technical and organisational security measures to prevent your personal data from being accidentally lost, falsified, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, contractors and other third-parties who have a business need to know it only.

We require all third parties to respect the security of your personal data and to treat it in accordance with Data Protection Legislation. Where we use third parties that are categorised as "data processors" as defined under Data Protection Legislation, we ensure that appropriate data processing terms are in place in our contractual documentation to protect the confidentiality and security of your personal data.

There are instances where we do transfer your personal data outside of the UK and/or the EEA. In these situations, we ensure that your personal data is protected by implementing at least one of the following safeguards:

- we will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission and/or the ICO (where applicable); and

- we will use certain contracts which are approved by the European Commission (such as the Standard Contractual Clauses) and/or the ICO (such as the International Data Transfer Agreement) which give personal data the same protection that it has in EEA and/or the UK (where applicable).

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA and/or the UK.

### **7. Where do we store your personal data and how do we protect it when it's transferred to others?**

All information you provide to us is stored on secure servers within the EEA and/or UK. We do not systematically transfer your personal data outside the EEA and the UK.

If you hold shares overseas, we may transfer personal data 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 and that you have agreed for us to do so.

Should we need to transfer your personal data to a country outside of the EEA and/or the UK, we will take all reasonable steps as necessary to hold the data securely and in accordance with Data Protection Legislation, in particular by putting in place appropriate technical and organisational safeguards.

### **8. How long do we retain your personal data for?**

We will retain your personal data for as long as we need to in order to fulfil the relevant purposes it was collected for and for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

### **9. What are your data protection rights?**

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

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 all of 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.
- 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 data portability which means the right to receive, move, copy or transfer your personal data to another data controller. You have the right to this when we are processing your personal data based on consent or on a contract and the processing is carried out by automated means.
- the right to lodge a complaint with the ICO (see below).

Please write to [compliance@vincowealth.co.uk](mailto: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.

#### **10. How do we approach compliance with marketing legal requirements?**

We will only send marketing communications to you if you have requested information from us or purchased services from us and you have not opted out of receiving that marketing. We will get your express opt-in consent before we share your personal data with any third-party for marketing purposes. You can ask us or third parties to stop sending you marketing messages at any time by contacting us at any time on [info@vincowealth.co.uk](mailto:info@vincowealth.co.uk) and withdrawing your consent. Where you opt out of receiving these marketing messages, this will not apply to messages that we need to send you a result of performing a contract that we have with you.

#### **11. Links to other websites**

Our website may include links to third-party websites and if you click on those links, you will be allowing third parties to collect and/or share data about you. We do not control these third-party websites and are not responsible for their privacy statements and therefore you are encouraged to read the privacy statements of other websites that you visit.

#### **12. Changes to this Privacy Notice**

We may edit or amend this Privacy Notice from time to time in which case we shall publish the amended version on our website.

#### **13. Contacting us**

If you have any questions about our Privacy Notice, please contact us at:

Vinco Wealth Management Limited  
County House, St. Mary's Street, Worcester WR1 1HB  
Telephone: 020 7412 8907  
E-mail: [compliance@vincowealth.co.uk](mailto:compliance@vincowealth.co.uk)  
Office Opening Times: 8am - 5pm, Monday to Friday.

Please note that you can complain to our data protection 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](http://www.ico.org.uk).

Last updated: January 2023