

## Privacy Policy Statement

Stewardship Wealth Ltd is committed to protecting your personal information. This privacy policy explains how we use any personal information we collect about you when you use our services.

### What the law says

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Data Protection regulations state that we are allowed to use personal information only if we have a proper reason to do so. The reasons we collect and use your data are:

- ☒ To fulfil our contract to provide services to you.
- ☒ When we have a legal duty - to obey laws and regulations that apply to us.
- ☒ When it is in the legitimate interest of the firm or of a third party - to run our business in an efficient and proper way.
- ☒ When you consent to it - when you agree for us to contact you to advise you of events or services that may be of interest to you.

### What information do we collect about you?

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By submitting your personal data to us via the enquiries request form and by using the various facilities on the site which enable you to e-mail us, you agree that any information we hold about you can be held on computer and/or paper files.

We collect information about you once you talk to us about your personal and financial circumstances. We may also collect information about you if you voluntarily complete customer surveys or provide feedback, for example.

Information we may collect includes:

- ☒ Contact details - names, addresses, phone numbers, email addresses.
- ☒ Financial details - employment details, bank details, investment and pension information.
- ☒ Data classified as 'sensitive' personal information e.g. relating to your health, marital or civil partnership status. This information will only be collected and used where it's needed to provide the product or service you have requested or to comply with our legal obligations.
- ☒ Open data and public records.
- ☒ Documentary data - passport, driving licence.
- ☒ Information on children e.g. where a child is named as a beneficiary for Inheritance Tax planning or on the policy taken out by a parent or guardian on their behalf. In these cases, we will collect and use only the information required to identify the child (such as their name, age, gender).

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

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We collect information about you to provide you with advice, periodically process your orders, manage your account and, if you agree, to contact you about products and services we think may be of interest to you. If you have agreed, we will pass on your relevant personal information to other firms party to transactions. We may be required to share your information with our regulators, compliance consultants, credit reference agencies and fraud prevention agencies (including for tax and anti-money laundering purposes).

We will collect and use your information only where:

- ☒ It's necessary to provide the service or product you have requested i.e. to fulfil the Terms of our Engagement with you.
- ☒ You have given us your consent e.g. when you agree for us to contact you to advise you of events, or general communication including blogs and industry insights.
- ☒ It's necessary for us to meet our legal or regulatory obligations - to obey laws and regulations that apply to us.

There may be situations where the information we require is a special category of personal data under the legislation. In this case we will explain why we need it and obtain your consent to obtain the data. This situation most commonly occurs where we are arranging life assurance products and need to obtain medical information from you.

We may share your data with these organisations but only for the reasons outlined above in "What the law says":

- ☒ Companies we have chosen to support us in the delivery of products and services we offer.
- ☒ Our Regulators and Supervisory Authorities.
- ☒ Law enforcement for the prevention and detection of crime.

We periodically check that these third parties have appropriate safeguards in place to protect your data and that they are compliant with Data Protection Regulations.

### How long will we hold the information about you?

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If we acquire information about you before we agree services, we will retain that information for a reasonable time (usually a year) in case you change your mind. Once we have formally agreed services, we will keep your personal information while you are a client or as long as required to meet our legal or regulatory obligations. We may keep it longer if we cannot delete it for legal, regulatory or technical reasons.

You can ask us to delete information we hold about you at any time, which we will do unless we have legal reason not to.

### Marketing

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We would like to send you information about services of ours or events we hold which may be of interest to you. If you have consented to receive marketing, 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, refer to the 'How to contact us' section below.

### Access to your information and correction

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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 email or write to us at the address below. We want to make sure that your personal information is accurate and up to date. You may ask us to correct or remove information you think is inaccurate.

## Scottish law

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While we will use all reasonable endeavours to ensure the accuracy of any information placed on this website, we make no representations or give any warranties of any kind with respect to this site or its contents and we disclaim all representations, except where fraudulently made, and warranties. In addition, we make no representation or warranties about the accuracy, or the information contained on this website.

The information on this website is for residents of the UK only. These Terms shall be governed by and construed in accordance with Scottish law and the Scottish courts shall have jurisdiction over any disputes between us.

## Other websites

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In the event that there are third party links to other websites for your convenience, we do not endorse the contents of any external sites and are not responsible or liable, directly or indirectly, for any loss however caused to you by your use of any external site. This privacy policy only applies to our own website so when you link to other websites you should read their own privacy policies.

## Capital at risk

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Past performance is not indicative of future results and no representation is made that results, where stated, will be replicated. Investment values rise and fall and the value of them is not guaranteed. On encashment you may not get back the amount invested.

## Financial Ombudsman Service (FOS)

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Clients are at the heart of our business and delivering an outstanding service at all times is what we strive to do. However, we recognise that from time to time our clients may have cause to make a complaint.

We are committed to dealing with complaints effectively and fairly in accordance with the Financial Conduct Authority's complaint handling rules and guidance. If clients have a cause to complain, a dedicated complaints handler, focused on ensuring that the clients are treated fairly during the process, will deal with the complaints.

If our clients are not satisfied with the outcome of their complaint, they will have the right to refer it to the Financial Ombudsman Service, free of charge, at The Financial Ombudsman Service Exchange Tower, London E14 9SR, or by going to their website [www.financial-ombudsman.org.uk](http://www.financial-ombudsman.org.uk).

## Professional/Retail status

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Each client with whom the firm does business is categorised to identify the level of regulatory protection to be applied. Although you may have extensive experience with investments through your pensions, ISAs and other plans, we take the view that it is unlikely that you will have the necessary knowledge of economic, market and tax issues surrounding your assets, to enable you to “run your wealth” efficiently without support. We have therefore chosen to categorise all clients as retail clients, which imposes a higher level of care on us and provides you with full regulatory protection.

If you believe you do have the investment knowledge and experience to run your financial affairs independently, you should tell us because that gives you more financial independence in your relationship with us. We will then assess your case and if it is justified, will classify you as an Elective Professional. Under certain conditions your circumstances might require us to offer you Professional Client status. The financial independence you gain as a professional investor is balanced by the regulatory protections you lose.

### Aggregated costs & charges

If you enter into a transaction where third parties are involved, they will charge for their services.

Typically, there will be 3 or 4 third parties involved. By way of example, if we placed a £500,000 investment for you the annual charges might look like this.

Third party	Percentage	Value
Platform	0.30%	£1,500.00
Product	Flat Fee	£80.00
Fund	0.35%	£1,750.00
<b>TOTAL</b>	<b>0.67%</b>	<b>£3,330.00</b>

To this you will need to add our ongoing charges, which are set out in our Engagement Terms of Business. We haven't added them here, because of the flexibility you have in how you pay us.

You should consider the impact of these charges. Simply put, if your investment grows by 4.67% before charges, the after charges growth would be 4%. In the above example, a year after the initial investment your £500,000 would be worth £523,330 before charges and £520,000 after charges.

At this point, this is just an example. We have no idea of the actual costs. We will confirm the actual aggregated costs and charges based on our recommendations in our Engagement Letter or Suitability Report, just as soon as we know the figures, but before you sign any commitment documents.

### How to contact us

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

By email at: [hello@stewardshipwealth.uk](mailto:hello@stewardshipwealth.uk)

By post at: Stewardship Wealth, Crichtiebank Business Centre, Mill Road, Inverurie, AB51 5NQ

By phone on: 01224 972 172