



Rootes Wealth Management Limited Data Protection Policy

Our contact details

Postal address: Rootes Wealth Management Limited, Riverside House, Tonbridge TN9 1EP

Phone: 01732 247 360

Email: contact@rootes.co.uk

Secure messaging: We encourage the use of Qwil Messenger for day-to-day communications over email. We will invite you to join Qwil (no cost) after the initial discussion.

The data controller of your personal information is Rootes Wealth Management Limited, registered in England and Wales. Company number: 14159023. Registered office: 10 Upper Grosvenor Road, Tunbridge Wells, England, TN1 2EP.

What personal information we collect

To provide you with accurate, personalised financial advice, we need to understand your individual circumstances. We collect and process the following types of information:

- Personal details such as your name, date of birth, address, and contact information.
- Employment and financial details including income, expenditure, bank statements, and credit history.
- Identification documents such as your passport or driving licence.

- Information from your existing financial providers, where you have given us authority to contact them.
- Family details, including dependants such as children.
- Health information and medical history, where relevant to the advice we provide.

Why we need this information

We use your information to maintain our professional relationship with you, to provide financial advice, and to obtain quotations and apply for products on your behalf. Some specific examples:

- **Mortgages** — to establish eligibility and affordability.
- **Protection (insurance)** — your or your family's medical history may affect the cost and availability of cover.
- **Pensions, savings and investments** — your expenditure, income, and likely future outgoings affect our recommendations.
- **Identity verification** — we are required by law to verify your identity under the Money Laundering Regulations 2017. We use an electronic verification service, which may leave a "soft search" on your credit record but will not affect your ability to borrow.

Our lawful basis for processing your information

Under the UK General Data Protection Regulation (UK GDPR), we rely on the following lawful bases depending on the type of processing:

- **Contractual necessity** — where processing is necessary to provide the financial advice and services you have engaged us for. This is the basis for most of our day-to-day processing of your information.
- **Legal obligation** — where we are required by law to process your data, for example to comply with anti-money laundering

regulations, FCA record-keeping requirements, and HMRC obligations.

- **Legitimate interests** — where processing is necessary for our legitimate business interests and does not override your rights, for example maintaining our records, managing our ongoing relationship with you, and conducting suitability reviews.

We do not rely on consent as the basis for our core advisory services. Where we do rely on consent (for example, for marketing communications or processing health and vulnerability information), you can withdraw it at any time by contacting us.

Health and vulnerability information

Some of the information we collect, such as your health status, medical history, or circumstances that may make you vulnerable, is classified as "special category data" under the UK GDPR. This information requires additional legal protection.

We may need to collect and use this information where it is directly relevant to the advice we provide — for example, when recommending protection products, assessing long-term care needs, or ensuring we treat you appropriately under our obligations as a regulated firm. We will only process this information with your explicit consent, which forms part of the acknowledgement at the end of this policy.

You can withdraw this consent at any time by contacting us. However, please be aware that doing so may limit our ability to provide certain types of advice.

Who we share your information with

We will only share your information where it is necessary to provide our services or where we are required to do so by law. The categories of organisations we may share your information with include:

- Financial product providers and platforms, in order to obtain quotations and submit applications on your behalf.

- Our professional indemnity insurer, where required.
- Our compliance consultancy partners, who undertake file reviews and regulatory oversight on our behalf.
- Regulatory authorities, including the Financial Conduct Authority.
- Legal authorities, where required by law.
- Technology providers who process data on our behalf (see "Where your data is stored" below). All such providers are subject to appropriate data processing agreements.

We will never sell your personal information to third parties.

Call and meeting recording

We record telephone calls and online meetings (such as Microsoft Teams) to maintain an accurate record of conversations and to help resolve any disputes. Our lawful basis for this is legitimate interests (accurate record-keeping and dispute resolution). You will be informed when a recording is taking place.

Where your data is stored

Your personal data is stored using a combination of cloud-based systems and secure document storage. Our client records and case management data are held on cloud platforms hosted within the European Union (Germany), operated by providers with whom we have appropriate data processing agreements in place. Documents and correspondence are stored within Microsoft 365 (SharePoint), with data held in UK data centres. Client communications are conducted through Qwil Messenger, a secure messaging platform hosted within the EU (Ireland). We use Brevo, a French company, for sending service-related emails and any marketing communications you have opted into; their primary infrastructure is within the EU, though some of their sub-processors operate in other jurisdictions under Standard Contractual Clauses approved by the European Commission. We do not transfer your personal

data outside the UK and EU without appropriate safeguards in place. All systems are access-controlled and, where available, protected by multi-factor authentication.

How long we keep your information

We retain your personal data for a minimum of six years after our professional relationship ends. This is in line with FCA regulatory requirements and limitation periods for potential claims.

For certain types of advice — specifically pension transfer and pension opt-out recommendations — we are required to retain your records indefinitely.

Anti-money laundering records are retained for five years from the end of the business relationship, as required by the Money Laundering Regulations 2017.

When information is due for removal, we will either delete or anonymise it.

Your data protection rights

Under data protection law, you have the following rights:

- **Access** — you can ask us for a copy of the personal information we hold about you.
- **Rectification** — you can ask us to correct information you believe is inaccurate or incomplete.
- **Erasure** — you can ask us to delete your personal information in certain circumstances (though this is subject to our regulatory retention obligations).
- **Restriction** — you can ask us to restrict how we use your information in certain circumstances.
- **Objection** — you can object to our processing of your information where we rely on legitimate interests.
- **Data portability** — you can ask us to transfer the information you provided to another organisation, or to you, in certain circumstances.

There is no charge for exercising these rights. If you make a request, we have one month to respond.

Please contact us if you wish to make a request.

How to complain

If you have any concerns about our use of your personal information, you can raise a complaint with us directly.

You can also complain to the Information Commissioner's Office (ICO):

Information Commissioner's Office Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF **Helpline:** 0303 123 1113 **Website:** <https://www.ico.org.uk>

Acknowledgement and consent

By signing this document, I confirm the following:

1. I have read and understood this policy and how Rootes Wealth Management Limited will process my personal data.
2. I consent to Rootes Wealth Management Limited collecting and processing my health information, medical history, and any information relating to circumstances of vulnerability, where this is relevant to the financial advice provided to me. I understand that I can withdraw this consent at any time by contacting the firm, and that doing so may limit the advice that can be provided.

Name: _____

Signed: _____

Date: _____
