

Our Privacy Statement

INVESTORS IN PEOPLE®
We invest in people Platinum

wingate BENEFIT SOLUTIONS

Privacy Notice

If you would like this document in larger print or in another format, please contact us.

WFS Consulting Limited trading as **Wingate Benefit Solutions** is part of the **Wingate Group** which includes **Wingate Wealth Management Limited** trading as **Wingate Financial Planning**.

We take your privacy seriously and are committed to handling your personal information lawfully, fairly and transparently under the UK GDPR and the Data Protection Act 2018.

This privacy notice explains how we collect, use, share, store and protect your personal information – including where we use artificial intelligence (AI).

When we refer to personal information about you this includes details we collect, process and hold on individuals and/or employees of the companies who engage us for the delivery of services.

This privacy notice also explains how you can make a complaint with us about how we handle your personal information.

Contact details

Please contact us if you have any questions about our privacy policy or personal information, we hold about you.

Via post
Quadrant House North, 61-65 Croydon Road, Caterham, Surrey CR3 6PB
Via phone
01883 332260
Via email
info@wingatebs.com
Data Protection Officer
Ben Clarke

What information do we collect about you?

We will collect or use your personal information when you engage us for employee benefits and/or financial advice services. This information may include;

- **Personal identifiers** – details that help us to confirm who you are, such as:
  - Your name, date of birth, address, contact details
  - Your gender and marital status
  - Employee ID reference
  - National insurance number
  - Identification documents (passport, driving licence)
- **Financial and professional information** – Information that helps us understand your financial position including:
  - Your income and regular spending
  - Employment information
  - Details of your employee benefit entitlements
  - Details of your assets, liabilities, pensions & investments
  - Tax information
  - Bank account details
  - We may also need to use **special category information**, but only, where relevant and with your explicit consent. This could include:
    - Health information
    - Racial or ethnic origin
    - Political opinions
    - Religious or philosophical beliefs
    - Trade union membership
    - Genetic information
    - Biometric information (where used to identify someone, such as for access or payment purposes)
    - Sexual orientation information
- **Communications** – to keep accurate records and meet regulatory requirements we may record:
  - Emails and notes of telephone calls and meetings
  - Records required to meet the Financial Conduct Authorities (FCA) requirements

How we collect your personal information

We collect personal information from your employer and directly from you during meetings, telephone calls, emails and through the completion of documents and online forms, which include client feedback surveys.



#obsessionwithquality

How we use your personal information

We use your personal information to help us deliver the services you have engaged us to deliver. This may include:

- Understanding your financial situation so we can give you the right advice
- Providing recommendations that meet FCA rules on suitability
- Enrolling you in to employee benefit schemes you have applied to join or are entitled to receive
- Applying for or arranging financial products on your behalf
- Carrying out identity, fraud and anti money laundering checks
- Keeping accurate and compliant records
- Communicating with you about employee benefits, pensions, policies and our services
- Investigating and responding to complaints

Who we share your personal information with

To provide you with our services, we sometimes need to share your personal information with trusted third parties. These may include:

- **Financial product providers** such as insurers, employee benefit, pension, health and wellbeing providers
- **Compliance consultants, auditors and professional advisers** who help us meet regulatory requirements
- **IT service providers and secure cloud platforms** that support our systems
- **Regulators and authorities** such as the FCA, HMRC and the Financial Ombudsman Service and, where appropriate, to support fraud prevention or safeguarding
- **Identity Verification agencies**, to help us fulfil our obligations in respect of prevention of money-laundering and other financial crime
- **Credit reference agencies**, but only when necessary

We never sell your personal information to anyone.

Using artificial intelligence (AI)

We will collect personal data, which may include sensitive personal data via AI transcription services, to provide transcripts and summary notes of meetings and/or telephone discussions.

AI tools may also be used for:

- Drafting documents or summarising information from documents, data and/or meeting notes
- Identify patterns or errors in data
- Enhance compliance monitoring
- Support risk assessments or vulnerability detection (non decision making)
- Transfer of information from documents and notes into our back-office system

We do not use any systems for making automated decisions.

We do not use AI tools that use your personal information to train public models.

Your data protection rights

You have several rights under data protection law. This helps you understand and control how your personal information is used.

- **Right to be informed** - you can ask us to explain how we collect, use, share, and store your personal information.
- **Right of access** - you can request a copy of the personal information we hold about you, along with details of how we use it.
- **Right to rectification** - if you think any of your information is wrong or incomplete, you can ask us to correct or update it.
- **Right to erasure** - in some situations, you can ask us to delete your personal information.
- **Right to restrict processing** - you can ask us to limit how we use your information in certain circumstances.
- **Right to object** - you can object to us using your personal information, for example for direct marketing.
- **Right to data portability** - you can ask us to send your personal information to you, or directly to another organisation, in a structured, commonly used electronic format.
- **Rights related to automated decision making and profiling** - if a significant decision about you is ever made without meaningful human involvement, you have the right to request human review, ask for an explanation and challenge the decision.

We will respond to any request you make about your data protection rights within one month.

To make a request, please contact us using the contact details in this privacy notice.



Privacy Notice ...continued

Our lawful bases for processing your personal information

UK data protection law requires us to have a valid legal reason—called a 'lawful basis'—for collecting and using your personal information. The lawful basis we rely on may affect which data protection rights apply to you. You can read more about your data protection rights, including any exceptions, on the Information Commissioner's Office (ICO) website: https://ico.org.uk/for-the-public/

The lawful basis we rely on for collecting and using your personal information to provide the financial planning advice and investment management services are:

Contractual obligations

This is the main reason we use your personal information. We need certain details from you and/or your employer, so we can deliver the services we've agreed to provide.

Legal obligations

Sometimes the law requires us to collect and use specific information. For example, UK anti money laundering laws require us to verify your identity.

Consent

In some situations, we may need your explicit consent to use special category information (listed under the section above headed 'What information do we collect about you?'. We will always explain why we need this information and ask for your clear agreement before using it.

We also ask for your consent if you would like to receive updates about products or services that may interest you.

If we rely on your consent, you can withdraw it at any time.

Legitimate interests

We may keep certain personal information because we have a legitimate business reason to do so, for example, to check the suitability of our services, respond to any complaints in the future, or to meet the requirements of our Professional Indemnity insurer.

Recognised legitimate interest

In limited cases, we may rely on recognised legitimate interests for specific public interest purposes, such as fraud prevention or safeguarding. This is narrowly defined and unlikely to apply to most of our routine services, but where used, we will ensure the processing is necessary and appropriate.

How long we keep your personal information

We keep the personal information to provide our services to you, and take reasonable steps to make sure it stays accurate and up to date. Some information must be kept for minimum periods set by our regulator, the Financial Conduct Authority (FCA):

- **Investment business** - 5 years
- **Pension transfers and optouts** - kept indefinitely
- **Insurance business** - 3 years

We also have to keep certain records to meet UK anti money laundering requirements. These include identity verification documents and other information used to confirm your identity.

- We will keep this information for at least 5 years after our relationship with you ends.
- Some records relating to transactions may be kept for longer where this is necessary to meet legal, regulatory or business requirements.

Because these are legal and regulatory requirements, we cannot delete your information before these minimum time periods have passed.

We may keep your personal information for longer if we have a legitimate business reason to do so, but we will not keep personal information for longer than necessary and will assess appropriate retention periods based on the purpose for which the information is held.

You can ask us to delete your personal information. We will do so unless we are required to keep it for legal or legitimate business reasons.

If you would like more information about how long we keep your personal information or how we decide this, please contact us.



Information about connected individuals

We may need to collect personal information about your close family members and dependents to provide our service(s) effectively. If this is the case, you are responsible for ensuring you have their consent to share this information with us.

If you act as a trustee or attorney, we may also need information about the relevant beneficiaries or donor(s).

We will provide them with a copy of this privacy notice, if requested.

Using cookies

We use cookies to:

- Understand how visitors use our website
- Help us create reports and improve our site
- Where consent is not required, you can still control or opt out of cookies through your browser settings at any time.

If you would like to learn more about cookies, you can visit: http://www.allaboutcookies.org/

You can change your browser settings to block or delete cookies at any time. The website above explains how to do this. Please note that if you choose to block cookies, some parts of our website may not work as expected.

Marketing

We would like to send you information about our products and services and those of the other companies in our group, which we feel may be of interest to you. This type of contact will only be made with your explicit consent.

If you have provided your consent for us to contact you for marketing purposes, you can change your mind at any time. Just get in touch using the contact details in this Privacy Notice.

We will not share your information for marketing purposes with any companies outside of the Wingate Group

Other websites

Our website may include links to other sites.

Please remember that this privacy notice only covers our website, so we recommend checking the privacy policies of any other sites you visit.

How to make a complaint

If you have any concerns about how we use your personal information, you have the right to raise a data protection complaint with us using the contact details in this Privacy Notice. You do not need to follow a specific process or use particular wording.

You can raise a complaint through any of our usual contact channels, including email, telephone or post. We will:

- Acknowledge your complaint promptly and at least within 30 days of receiving it
- Investigate and respond without undue delay
- Keep you informed where appropriate

Further details of our complaints process are available on request.

If you are not satisfied with our response, you have the right to escalate your complaint to the Information Commissioner's Office (ICO).

The ICO's address:
Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Helpline number:
0303 123 1113

Website:
www.ico.org.uk/make-a-complaint





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Wingate Benefit Solutions is the trading name of **WFS Consulting Ltd**.

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