

Client Privacy Notice

Blackmount Private Wealth is committed to protecting the information provided to us by our clients (past and present), prospective clients, and visitors to our website. This is paramount to our core business values and regulatory compliance.

This privacy policy applies between you, the client, prospective client, and/or User of this Website, and Blackmount Private Wealth Limited which is the owner and provider of our Website.

About this document and why you should read it

Blackmount Private Wealth Limited (we/us/our/the Firm) will ask you to provide detailed personal information relating to your existing circumstances, your financial situation and, in some cases, your health and family health history (**Your Personal Data**). We must do this to successfully conduct business. This document is important as it allows us to explain to you what we need to do with Your Personal Data, and the various rights you have in relation to Your Personal Data.

Blackmount Private Wealth Limited (a UK registered company, registered in Scotland with company number SC724182) is the data controller of your personal data and is subject to the Data Protection Act 1998 (“DPA”) and the General Data Protection Regulation (“GDPR”).

Blackmount Private Wealth Limited is an Appointed Representative of Vision Independent Financial Planning Ltd which is Authorised and Regulated by the Financial Conduct Authority (FCA). Firm reference number 487395.

What do we mean by “Your Personal Data”?

Your Personal Data means any information that describes or relates to your personal circumstances. Your Personal Data may identify you directly – for example your name, address, date of birth, national insurance number. Your Personal Data may also identify you indirectly – for example your employment situation, your physical and mental health history, or any other information that could be associated with your cultural or social identity.

In the context of providing assistance to you in relation to financial advice (including on your investments, insurance, finances etc.) Your Personal Data may include:

- Title, name, date of birth, gender, nationality, civil/marital status, contact details, addresses, and documents that are necessary to verify your identity
- Employment and remuneration information (including salary/bonus schemes/overtime/sick pay/other benefits), employment history
- Bank account details, tax information, loans and credit commitments, personal credit history, sources of income and expenditure, family circumstances and details of dependents
- Health status and history, details of treatment and prognosis, medical reports (further details are provided below specifically about the processing we may undertake in relation to this type of information)
- Any pre-existing financial products (investments, insurance, mortgage, and/or finance) and the terms and conditions relating to these.

The basis upon which the firm will deal with Your Personal Data

When we speak with you about your requirements for financial advice (on investments, insurance, finances etc.) we do so on the basis that both parties are entering a contract for the supply of services.

To perform that contract, and to arrange the products you require, we have the right to use Your Personal Data for the purposes detailed below.

Alternatively, either in the course of initial discussions with you or when the contract between us has come to an end for whatever reason, we have the right to use Your Personal Data provided it is in our legitimate business interest to do so and your rights are not affected. For example, we may need to respond to requests from insurance providers, mortgage lenders, and our Compliance Service Provider relating to the advice we have given to you; or contact you to seek feedback on the service you received.

On occasion, we will use Your Personal Data for contractual responsibilities we may owe our regulator, The Financial Conduct Authority (FCA), or for wider compliance with any legal or regulatory obligation to which we



might be subject. In such circumstances, we would be processing Your Personal Data to meet a legal, compliance, or other regulatory obligation to which we are subject.

The basis upon which we will process certain parts of Your Personal Data

Where you ask us to assist you with, for example, your insurance – in particular life insurance and insurance that may assist you in the event of an accident or illness – or ethical investments we will ask you for information about your ethnic origin, your health and medical history, and/or religious or philosophical beliefs (**Your Special Category Data**). We will record and use your Special Category Data to make enquiries of insurance or investment providers in relation to insurance or investment products that may meet your needs and to provide you with advice or guidance regarding the suitability of any product that may be available to you.

If you have parental responsibility for children under the age of 13, it is also very likely that we will record information on our systems that relates to those children and potentially, to their Special Category Data.

The arrangement of certain types of insurance may involve disclosure by you to us of information relating to historic or current criminal convictions or offences (together “**Criminal Offense Data**”). This is relevant to insurance related activities such as underwriting, claims, and fraud management.

We will use Special Category Data and any Criminal Offense Data in the same way as Your Personal Data generally, as set out in this Client Privacy Notice.

Information on Special Category Data and Criminal Offense Data must be capable of being exchanged freely between insurance intermediaries such as the Firm, and insurance providers to enable clients to secure the important insurance protection that their needs require.

How do we collect Your Personal Data?

We will collect and record Your Personal Data from a variety of sources, but mainly directly from you. You will usually provide information during our initial meetings or conversations with you to establish your circumstances, and needs and preferences in relation to investments, insurance, mortgages, and/or finance etc. You will provide information to us verbally and in writing, including email.

We begin to collect Your Personal Data when you interact with us. This may be, for example:

- When you communicate with us over the phone, via email or the Website (www.blackmountwealth.co.uk)
- From information you provide to us when you interact with the Firm (for example when you contact us about our services)
- When you ask us to provide services to you and subsequently provide us with the necessary information to do so
- In any other ways you interact with us.

We may also obtain some information from third parties, for example: credit checks, information from your employer, and searches of information in the public domain (such as the voters roll). If we use technology solutions to assist in the collection of Your Personal Data (for example, software that can verify your credit status); we will only do this if we have consent from you for us or our nominated processor to access your information in this manner. With regards to electronic ID checks, we would not require your consent but will inform you of how such software operates and the purpose for which it is used.

Where you provide us with personal data relating to others (e.g. your family members), we understand that you either have their consent or are entitled to provide this information to us for subsequent use.

Use of “Cookies”

By using our Website, the online service or any other online facility or service provided by us, you acknowledge that we may:

- Collect information about your computer or device (for example your IP address, operating system and browser type) for security purposes and to administer and monitor our online services; and/or
- Use cookies and similar technologies for security purposes, and where this is essential to provide you with services you have requested; and to monitor and personalise our online services



- To the extent that you access the Website, we will collect Your Personal Data automatically, for example:

We will automatically collect some information about your visit to the Website. This information helps us to make improvements to Website content and navigation, and includes your IP address, the date, times and frequency with which you access the Website and the way you use and interact with its content.

We will collect Your Personal Data automatically via cookies, in line with the cookie settings on your browser. For more information about cookies, and how we use them on the Website, see the section below, headed “Cookies”.

Cookies

Our Website may place and access certain Cookies on your computer. Blackmount Private Wealth Limited uses Cookies to improve your experience of using the Website and to improve our range of services. Blackmount Private Wealth Limited has carefully chosen these Cookies and has taken steps to ensure that your privacy is protected and respected at all times.

All Cookies used by this Website are used in accordance with current UK and EU Cookie Law.

Before the Website places Cookies on your computer, you will be presented with a message bar requesting your consent to set those Cookies. By giving your consent to the placing of Cookies, you are enabling Blackmount Private Wealth Limited to provide a better experience and service to you. You may, if you wish, deny consent to the placing of Cookies; however certain features of the Website may not function fully or as intended.

This Website may place the following Cookies:

Type of Cookie	Purpose
Strictly Necessary Cookies	These are Cookies that are required for the operation of our website. They include, for example, Cookies that enable you to log into secure areas of our website, use a shopping cart or make use of e-billing services.
Analytical/performance Cookies	These allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily.
Functionality Cookies	These are used to recognise you when you return to our website. This enables us to personalise our content for you, greet you by name and remember your preferences (for example, your choice of language or region). By using the Website, you agree to our placement of functionality Cookies.
Targeting Cookies	These Cookies record your visit to our website, the pages you have visited and the links you have followed. We will use this information to make our website and the advertising displayed on it more relevant to your interests. We may also share this information with third parties for this purpose.

You can find a list of Cookies that we use in the Cookies Schedule below.

You can choose to enable or disable Cookies in your internet browser. By default, most internet browsers accept Cookies but this can be changed. For further details, please see the help menu in your internet browser. You can switch off Cookies at any time, however, you may lose any information that enables you to access the Website more quickly and efficiently.

You can choose to delete Cookies at any time; however, you may lose any information that enables you to access the Website more quickly and efficiently including, but not limited to, personalisation settings.

It is recommended that you ensure that your internet browser is up-to-date and that you consult the help and guidance provided by the developer of your internet browser if you are unsure about adjusting your privacy settings.

For more information generally on cookies, including how to disable them, please refer to aboutcookies.org. You will also find details on how to delete cookies from your computer.

Links to other Websites and Services

Our website may contain links to other websites, which are not under our control. The links to other sites are for your convenience and we do not accept any responsibility or liability for enabling you to link to any other website, or for any consequence of your acting upon the contents of such website(s). No endorsement or approval of any third parties or their advice, opinions, information, products or services is expressed or implied by any information on our website.

What happens to Your Personal Data when it is disclosed to us?

While handling Your Personal Data, we will:

- Record and store Your Personal Data in our computer systems (email, hard drives, cloud facilities, and websites), mobile devices, and in our paper files. This information can only be accessed by employees and consultants within the Firm and from time to time those of our Principal (Vision Independent Financial Planning Ltd.) and only when it is necessary to provide our service to you and to perform any administrative tasks associated with or incidental to that service.
- Submit Your Personal Data to investment and insurance product providers, both in paper form and online. The provision of this information to a third party is essential in allowing us to progress any enquiry or application made on your behalf and to deal with any additional questions or administrative issues that providers may raise.
- Use Your Personal Data for the purposes of responding to any queries you may have in relation to any investment product or insurance policy you take out, or to inform you of any developments in relation to those products and/or policies of which we might become aware.

Sharing Your Personal Data

From time to time Your Personal Data will be shared with:

- Vision Independent Financial Planning Ltd. (our Principal)
- Any other organisations that we may engage to perform, or assist in the performance of, our services or to advise us, provided that they will only be given access to Your Personal Data (including Your Special Category Data, where applicable) to perform such assistance, services or advice and not for other purposes.
- Counterparties where disclosure is reasonably necessary for the purpose of effecting transactions in connection with our Client Agreement or Terms of Business or any other contractual document or of establishing a dealing relationship with a view to such transactions.
- The other named client, if you are a joint client, in any relevant Client Agreement or Terms of Business or other contractual document.
- Any 'connected person' as set out in our Client Agreement or Terms of Business or any other contractual document unless you expressly instruct us in writing to do otherwise.
- Relevant third parties as part of a reorganisation, sale, or negotiations for sale of all or part of the Firm (subject to appropriate security and confidentiality measures)
- Third parties that we are required or authorised by law (including, but not limited to, data protection legislation), court order, regulatory or governmental authorities in circumstances which require us to Disclose Your Personal Data.

In each case, Your Personal Data will only be shared for the purposes set out in this Client Privacy Notice (i.e. to provide you with our professional services as set out our Client Agreement or Terms of Business or any other contractual document).



Please note that this sharing of Your Personal Data does not entitle such third parties to send you marketing or promotional messages. It is shared to ensure we can adequately fulfil our responsibilities to you, and as otherwise set out in this Client Privacy Notice.

We do not operate globally, but we may transmit and process Your Personal Data outside of the UK. Where this is the case, we will ensure that Your Personal Data is subject to the same level of data protection as in the UK.

Security and retention of Your Personal Data

We will keep Your Personal Data secure in accordance with our legal responsibilities. We will take reasonable steps to safeguard Your Personal Data against it being accessed unlawfully or maliciously by a third party.

We also expect you to take reasonable steps to safeguard your own privacy when transferring information to us, such as not sending confidential information over unprotected email, ensuring email attachments are password protected or encrypted, and only using secure methods of postage when original documentation is being sent to us.

Your Personal Data will be retained by us either electronically or in paper form for as long as we are providing you with the services referred to in any relevant Client Agreement, Terms of Business or any other contractual document, and for as long as permitted or required for legal, regulatory, fraud prevention and our legitimate business purposes after the closure of your account, if the relationship between you and us has terminated, or if your application for a particular service or services is declined or abandoned.

Your rights in relation to Your Personal Data

You can:

- Obtain access to, and copies of, Your Personal Data that we hold about you
- Require that we cease processing your personal data if the processing is causing you damage or distress
- Require us not to send you marketing communications
- Require us to correct, delete or require us to restrict or stop using Your Personal Data (details as to the extent to which we can do this will be provided at the time of any such request)
- Receive from us Your Personal Data we hold about you which you have provided to us, in a reasonable format specified by you, including for the purpose of you transmitting Your Personal Data to another data controller
- Change the basis of any consent you may have provided to enable us to market to you in the future (including withdrawing any consent in its entirety)
- Require us to comply with your objection, to any of our particular processing activities where you feel this has a disproportionate impact on your rights.

Please note that the above rights are not absolute, and we may be entitled to refuse requests where exceptions apply.

If you have given your consent and you wish to withdraw it, please contact us using the details below.

How to contact the Firm in relation to the use of Your Personal Data

If you have any questions or comment about this document, or wish to contact us to exercise any of your rights set out within it, please contact:

- Qasim Younis, Director, at the registered offices: Blackmount Private Wealth Limited, Clyde Offices, 48 West George Street. Glasgow. G2 1BP.

If we feel we have a legal right not to deal with your request, or to action it in a different way to how you have requested, we will inform you of this at the time.

You should inform us as soon as possible on you becoming aware of any unauthorised disclosure of Your Personal Data, so that we may investigate and fulfil our own regulatory obligations.

If you have any concerns of complaints as to how we have handled Your Personal Data you may lodge a complaint with the UK's data protection regulator, the ICO, who can be contacted via their website at: <https://ico.org.uk/global/contact-us/> or by writing to Information Commissioner's Office, Wycliffe House, Water Lane. Wilmslow. Cheshire. SK9 5AF.



Cookies Schedule

Below is a list of the cookies that we use. We have tried to ensure this is complete and up to date, but if you think that we have missed a cookie or there is any discrepancy, please let us know.

Strictly necessary

We use the following strictly necessary cookies:

Description	Purpose
Session Cookies	We use this session cookie to remember you and maintain your session whilst you are using our website

Functionality

We use the following functionality cookies:

Description	Purpose
Functionality Cookies	We use this cookie to identify your computer and analyse traffic patterns on our website

Analytical/performance

We use the following analytical/performance cookies:

Description	Purpose
Analytical & Performance Cookies	We use this session cookie to help us analyse how users use the website

Targeting

We use the following targeting cookies:

Description	Purpose
Targeting Cookies	We use this session cookie to enable us to show you adverts while you are browsing our website and other websites on the internet.