



# Privacy Notice.

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[www.astuteprivatewealth.co.uk](http://www.astuteprivatewealth.co.uk)

# Privacy Notice

Astute Private Wealth Ltd is directly authorised by the Financial Conduct Authority. This privacy notice explains how we use any personal information we collect about you.



## What information do we collect about you?

When you engage us for financial planning or mortgage advice, we collect information about you. This information will relate to your personal and financial circumstances. It may also include special categories of personal data such as data about your health, if this is necessary for the provision of our services.

We may also collect information when you voluntarily complete client surveys or provide feedback to us.

Information relating to the usage of our website is collected via cookies. These are text files placed on your computer to collect standard internet log information and visitor behaviour information. We'll use your information collected from the website to personalise your repeat visits to the site.



## Information about connected individuals

We may need to gather personal information about your close family members and dependants in order to provide our service to you effectively. In such cases it will be your responsibility to ensure that you have the consent of the people concerned to pass their information on to us. We'll make available a copy of this privacy notice for them or, where appropriate, ask you to pass the privacy information on to them.



# Why do we need to collect and use your personal data?

We must have a lawful basis to process your personal data. Under the UK General Data Protection Regulation (UK GDPR), the lawful bases we rely on for processing this information are:

## **We have a contractual obligation**

This is the primary legal basis that we intend to use for processing your data. The personal information that we collect about you is essential for us to be able to effectively carry out the services that we have agreed to deliver to you.

## **We have a legal obligation**

Sometimes collecting personal data is needed to meet our legal and regulatory obligations. For example, UK anti-money laundering legislation may require us to collect personal information to verify your identity.

## **We have a legitimate interest**

We rely on legitimate interest to retain relevant data for the purposes of assessing the appropriateness of our services, defending future complaints, and meeting our Professional Indemnity Insurer's expectations.

## **We will obtain your consent**

Special category data, such as that relating to health matters, is often required to provide our services. When this is required, we will obtain your explicit consent to collect and process this information.

You may withdraw your consent at any time by notifying us at our main business address.



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

We collect information about you in order to provide you with the services for which you engage us.



## Who might we share your information with?

If you agree, we may email you about other products or services that we think may be of interest to you.

We won't share your information for marketing purposes with companies outside our group of companies/other companies.

In order to deliver our services to you effectively, we may send your details to third parties such as those that we engage for professional compliance, accountancy or legal services, as well as the product and platform providers that we use to arrange financial products for you.

Where third parties are involved in processing your data, we will have a contract in place with them to ensure that the nature and purpose of the processing is clear, that they are subject to a duty of confidence when processing your data, and that they'll only act in accordance with our written instructions.

Where it's necessary for your personal data to be forwarded to a third party, we'll use appropriate security measures to protect your personal data in transit. For example, by using password protection, encryption etc.

To fulfil our obligations in respect of the prevention of money-laundering and other financial crime, we may send your details to third party agencies for identity verification purposes.



## How long do we keep hold of your information?

In principle, your personal data shouldn't be held for longer than is required under the terms of our contract for our services with you. However, we're subject to regulatory requirements to retain data for specified minimum periods.

During the course of our relationship with you, we'll retain any personal data necessary to provide our services to you. We'll take all reasonable steps to keep your personal data up to date throughout our relationship.

We're also subject to regulatory requirements to retain your data at the end of the relationship for specified minimum periods. Generally, these are:



Five years for investment business



Three years for mortgage business



Indefinitely for pension transfers and opt-out business



Three years for insurance business

These are the minimum periods during which we have a legal obligation to retain your records.

We also reserve the right to retain data for longer than this due to the possibility that it may be required to defend a future claim against us.

You have the right to request the deletion of your personal data. We'll comply with this request, subject to the restrictions of our regulatory obligations and legitimate interests as noted above.



## How can you access the information we hold about you?

You have the right to request a copy of the information that we hold about you. If you'd like a copy of some or all of your personal information, please email or write to us using the contact details in this document.

When your personal data is processed by automated means, you have the right to ask us to move your personal data to another organisation for their use.

We have an obligation to ensure that your personal information is accurate and up to date. Please ask us to correct or remove any information that you think is incorrect.



## Recording Telephone Calls

We record telephone calls to ensure the quality of our service and to keep a record of important discussions or instructions. Access to call recordings is limited to authorised staff and only when necessary, for example to handle a complaint or carry out an internal review.



## Marketing

We do not actively send any marketing information about our products and services to clients. However, if this policy changes and we do decide to send you any marketing information at any future time, you will have the opportunity to opt out.

You will have the right at any time to stop us from contacting you for marketing purposes or giving your information to other members of the group. If, at any time in the future, you no longer wish to be contacted for marketing purposes, please contact us by email or post.



## Cookies

We use cookies to track visitor use of the website and to compile statistical reports on our website's activity.

For further information, visit <http://www.allaboutcookies.org/>

You can set your browser not to accept cookies and the above website tells you how to remove cookies from your browser. However, in a few cases, some of our website features may not function as a result.



## Other websites

Our website contains links to other websites. This privacy policy only applies to this website so when you link to other websites, you should read their own privacy policies.

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## What can you do if you are unhappy with how your personal data is processed?

You also have a right to lodge a complaint with the supervisory authority for data protection. In the UK, this is:

**Information Commissioner's Office**  
**Wycliffe House**  
**Water Lane**  
**Wilmslow**  
**Cheshire**  
**SK9 5AF**

0303 123 1113 (local rate)



## Changes to our privacy policy

We keep our privacy policy under regular review and we'll inform you of any changes when they occur. This privacy policy was last updated in April 2025.



## How to contact us

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

By email: [infochester@astutepw ltd.co.uk](mailto:infochester@astutepw ltd.co.uk) & [infoliverpool@astutepw ltd.co.uk](mailto:infoliverpool@astutepw ltd.co.uk)

Write to us: Astute Private Wealth Ltd

Chester Office: 2nd Floor, Vista Building, St. David's Park, Ewloe, Flintshire CH5 3DT

Liverpool Office: 5th Floor, 4 St. Paul's Square, Liverpool L3 9SJ



PRIVATE WEALTH LTD

#### **Chester Office**

2nd Floor, Vista Building,  
St David's Park, Ewloe, Flintshire,  
CH5 3DT

T: 01244 660 793

E: [infochester@astutepw ltd.co.uk](mailto:infochester@astutepw ltd.co.uk)

#### **Liverpool Office**

5th Floor, 4 St Paul's Square  
Liverpool, L3 9SJ

T: 0151 236 9507

E: [info liverpool@astutepw ltd.co.uk](mailto:info liverpool@astutepw ltd.co.uk)

#### **Knutsford Office**

The Old Forge, Moseley Hall  
Farm, Knutsford, Cheshire,  
WA16 8RB

T: 01565 621 211

Astute Private Wealth Limited registered in England No. 11365701. Registered Office: 2nd Floor, Vista Building, St David's Park, Ewloe, Flintshire. CH5 3DT. Astute Private Wealth Limited is authorised and regulated by the Financial Conduct Authority.

# Your Consent.

## Sensitive Personal Data

The primary basis on which we intend to process your personal data is for the performance of our contract with you. In the case that we need to process special category (sensitive) data, as described on page 2, we require your consent by indicating your agreement to the following statement:

**I/We consent to the processing of sensitive personal data insofar as it is necessary for the services I/we require from Astute Private Wealth Ltd.**

Client 1  
Name:

Date:

Signature:

Client 1  
Name:

Date:

Signature:

Please note that you may withdraw this consent at any time by notifying us at our main business address.

We may also engage the services of third-party providers of professional services in order to enhance the service we provide to you. These parties may also need to process your personal data in the performance of their contract with us. If you wish to know the names of these third parties, please contact us for further information.

We strive to minimise the use of paper where possible, and conduct our day-to-day communications digitally. However, we understand that for some of our clients, this is not appropriate. If you would prefer to opt out of digital communications and receive information by post, please let us know.

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