

Financial Planning – The Services We Offer

Financial Planning is a service provided by Wealth Financial Planning Jersey Limited which is authorised and regulated by the Jersey Financial Services Commission (JFSC) under the Financial Services (Jersey) law 1998.

Wealth Financial Planning Jersey Limited provides advice and services in the following areas:

- Personal Financial Planning
- Corporate & Fiduciary Financial Planning
- International Financial Planning

Wealth Financial Planning Jersey Limited will complete an “Initial discovery meeting” to ascertain which of our services may be most suitable for you or your organisation. We will describe our services in detail and explain our fee structure, as well as your payment options.

- For Personal Financial Planning we will agree the most suitable service level from our Private Client Menu.
- For Corporate and International Financial Planning, the complexities and variation of requirements require us to offer a tailored service agreement and fee proposal designed for your specific requirements.

If you decide to use our services, then we will:

Use objectives and financial information provided by you in relation to you or your client’s circumstances, to recommend or advise an appropriate solution for your particular requirement. This may include, but is not exclusively limited to, advice both on existing or the provision of new financial arrangements such as:

- **Investments** – Collective Funds, Investment Platforms and Discretionary Investment Managers
- **Financial Protection** – Individual, Trustee, key-man and group financial protection
- **Retirement** – Retirement Annuity Trusts, Self-Invested Pension Companies, Corporate Schemes and international pension transfers (QROPS)

How Will Wealth Financial Planning Jersey Limited be remunerated

All fees and charges payable will be discussed and confirmed in writing to you by way of our client service proposition, fee proposal and Suitability Letter. We will not charge you for any advice until you have signed and agreed how we are to be paid.

Ongoing Services and Regular Reviews

We offer our clients a range of service levels dependent on individual requirements. As a minimum we will write to all our active clients and offer an annual opportunity to join us in reviewing your financial planning objectives and existing arrangements.

If you have not selected one of our service level options, yet we have arranged a financial product for you, we will not automatically contact you to review the on-going suitability of that product in relation to your circumstances.

Treating Customers Fairly

Wealth Financial Planning Jersey Limited appreciates that any financial planning should provide both peace of mind and ensures that our clients receive value for money. We believe in forging long term relationships with our clients.

We will endeavor to make communications clear, fair and not misleading. We will always seek to be accountable, use Integrity, impartiality whilst building a trusting relationship with our clients and we expect the same from the clients in return.

Switching Funds, Model Portfolio Adjustments and Administrative Instructions

If you wish us to switch investment funds within your portfolio, then we will require you to give us instructions in writing. Instructions can be received by letter, scanned email, or faxed. Instructions must clearly state investment switch instructions and be signed, Wealth Financial Planning Jersey Limited's switch authorisation template is also available on request for this purpose.

For clients aligned to a recommended solution provided by Wealth Financial Planning to which we recommend a change, we will write to you to inform you of the recommendation and why we feel the action is suitable. We will request you confirm your agreement and understanding in writing before we proceed with the action.

Fund switching within some products is free and unlimited; however we reserve the right to charge a switch fee if switches exceed more than 6 switches per annum.

Verbal Fund Switch Instructions

Wealth Financial Planning Jersey Limited may, in certain circumstances and at our discretion, accept verbal instructions provided that you confirm the instruction in writing at a later date.

Ownership and Custody of Assets

All investments will be registered in your name or in the name of your appointed Trustee or director. We do not hold client cash or any investment product in any of the directors' personal names or in the name of the company, Wealth Financial Planning Jersey Limited. We will forward you the policy, contract note or other documents showing ownership of your financial arrangement, as soon as practicable, after we receive them from the issuing company. We do not hold custody of assets, but we may recommend product providers that can offer this service. We therefore do not accept client cheques made payable to us except in settlement of charges for fees.

Termination of Contract

Either Wealth Financial Planning Jersey Limited or the Client may terminate the Contract entered into between them by either party giving to the other party three months' notice of such termination in writing in which event::

- the Contract shall automatically terminate at the end of such three month period;
- In the case that the Client's Contract with Wealth Financial Planning Jersey Limited is to provide investment advice then the Client's obligation to pay investment advisory fees to Wealth Financial Planning Jersey Limited pursuant to the terms of the Contract shall continue to be due and payable during the aforesaid three month notice period.

Reclaim of Financial Protection Fees

In the event that Wealth Financial Planning Jersey Limited suffers a claw back of fees paid by a provider for the arrangement of financial protection products and which have been rebated either in full, or in part to the client, Trustee or Director, we will seek to reclaim the rebated fees on a pro rata basis, as set out in our returned fee agreement.

Complaints

Should you have any cause for complaint with regard to our advice or our services provided, you should contact Wealth Financial Planning Jersey Limited or write to the Compliance Officer. You will receive an acknowledgement letter following your complaint within 5 days of us receiving your complaint.

Should you remain dissatisfied with the outcome following our handling of your complaint you can contact our regulator The Jersey Financial Services Commission at the address shown below or The Channel Islands Financial Ombudsman.

The Jersey Financial Services Commission

Wealth Financial Planning Jersey Limited is authorised and regulated by the Jersey Financial Services Commission (JFSC) for the conduct of Investment Business, under the Financial Services (Jersey) law 1998. Our Company Registration Number is IB 000268. The JFSC web site is www.jerseyfsc.org and their address is PO Box 267, 14-18 Castle Street, St Helier, Jersey JE4 8TP.

Risk Warnings

Investments of any kind have risks attached. World events can have catastrophic effects on what can sometimes be viewed as even the lowest risk investment products.

We would also bring to your attention the following:

- Past performance is not necessarily a guide to future performance.
- The Value of your investments can rise and fall.
- You may not get back the amount you originally invested.
- Income received from your Investments may rise and fall and may not be guaranteed.
- Taxation rates and tax reliefs can change over time which can affect your personal circumstances and financial situation in the future.
- Some funds, such as Emerging Markets, Commodities, Hedge Funds and funds that hold other currencies other than Sterling can offer even greater risks to your capital. They also may deal infrequently and may delay redemption.
- Your risk reward attitude may change with market sentiment or change in personal circumstances, therefore you must inform us of these changes immediately and arrange a review of your investments.
- Failure to disclose any personal health information on applications for life or critical illness insurance policies can result in non-payment of benefits.

Wealth Financial Planning Jersey Limited maintains Professional Indemnity Insurance as required by the Jersey Financial Services Commission.

Wealth Financial Planning – Privacy Policy

Wealth Financial Planning Jersey Limited respects your privacy and is committed to protecting your personal data. This privacy notice will inform you as to how we look after your personal data and tell you about your privacy rights and how the law protects you.

Please also use the Glossary to understand the meaning of some of the terms used in this privacy notice.

Important information and who we are

Purpose of this privacy notice

This privacy notice aims to give you information on how Wealth Financial Planning Jersey Limited collects and processes your personal data, including any data you may provide through our website, our client portal and when you purchase a product or service from us.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions, when we are collecting or processing personal data about you, so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

Controller

Wealth Financial Planning Jersey Limited is the controller and responsible for your personal data (collectively referred to as "Wealth Jersey" "we", "us" or "our" in this privacy notice).

We have appointed a data privacy manager who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise *your legal rights* please contact the data privacy manager using the details set out below.

Contact details

Our full details are as follows:

Full name of legal entity: **Wealth Financial Planning Jersey Limited**

Name of privacy manager: **Ryan Lewis**

Email address: **ryan@wealthjersey.com**

Postal address: **1st Floor Brunel House | Old Street | St. Helier | JE2 3RG**

Phone Number: **(44) 1534 888404**

You have the right to make a complaint at any time to the Jersey Information Commissioner's Office (ICO), the Jersey supervisory authority for data protection issues (www.woicjersey.org). We would, however, appreciate the chance to deal with your concerns before you approach the ICO. so please contact us in the first instance.

Changes to the privacy notice and your duty to inform us of changes

This version was last updated on **15.05.2018**.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

Third-party links

Our website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

The data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

What kind of personal data do we collect?

- names and contact information;
- general demographic information (such as gender, age, date of birth, marital status, nationality, employment details, residence, utility bills, etc.);
- Financial arrangements, savings, investments and financial protection plan details;
- personal identification documentation and related information such as passport numbers, national ID Card, driver's licence and employee identification numbers;
- source of wealth;
- financial and payment data such as bank account numbers, bank statements and transaction information;
- tax residency; and
- information related to the provision of the services performed under the contract for services to our clients.

The list above is not exhaustive and that Wealth Financial Planning may also collect and process personal data to extent this is useful or necessary for the provision of our services.

We do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

We may however ask you to provide this information directly to a third party life assurance provider for the purposes of an application made to them. In this instance we do not store this data in any way.

If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with Financial Planning Services). In this case, we may have to cancel a service you have with us, but we will notify you if this is the case at the time.

How is your personal data collected?

We use different methods to collect data from and about you including through:

Direct interactions. You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you apply for our products or services;

- create an account on our client portal;
- subscribe to our service or publications;
- request marketing to be sent to you;

- or give us some feedback.

Automated technologies or interactions. As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies.

Third parties or publicly available sources. We may receive personal data about you from various third parties as set out below

Technical Data from the following parties:

- analytics providers such as Google based outside the EU;
- search information providers inside **OR** outside the EU.
- Identity and Contact Data from publicly available sources such as Companies House and the Electoral Register based inside the EU.

How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

Where we need to perform the contract of financial planning services we have entered into with you.

Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

Where we need to comply with a legal or regulatory obligation.

Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. We will always ask you to make certain decisions about your personal data use before proceeding to provide services

Third-party marketing

We will get your express opt-in consent before we share your personal data with any company outside the Wealth Financial Planning for marketing purposes.

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please **contact us**.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

Disclosures of your personal data

Wealth Financial Planning may disclose or transfer personal data collected by Wealth Financial Planning to other companies insofar as reasonably necessary for the purposes of our service offering, or for bona fide compliance purposes, as well as on the legal basis as set out in this Privacy Notice.

Except as described in this paragraph, Wealth Financial Planning will not disclose, transfer or sell your personal data to any third party unless you have consented to this.

The following is a list of potential recipients of data (in each case including respective employees, directors and officers):

Other providers of services (legal, governance or otherwise, including any bank or financial institution providing services in relation to any matter on which Wealth Financial Planning is instructed) where disclosure to that provider of services is considered necessary to fulfil the purposes set out above;

Any sub-contractors, agents or service providers of the Wealth Financial Planning;

Courts or tribunals;

Law enforcement agencies where considered necessary for Wealth Financial Planning to fulfil legal obligations applicable to it;

Regulators or other governmental or supervisory bodies with a legal right to the material or a legitimate interest in any material;

Any registrar of a public register where the data is to be included in a public registry;

Potential parties with whom Wealth Financial Planning Jersey intends to merge or sell Wealth Financial Planning; and

Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

International transfers

A small number of our external third parties are based outside the European Economic Area (**EEA**) so their processing of your personal data will involve a transfer of data outside the EEA.

Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented.

We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission. For further details, see European Commission: Adequacy of the protection of personal data in non-EU countries.

Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe. For further details, see European Commission: Model contracts for the transfer of personal data to third countries.

Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US. For further details, see European Commission: EU-US Privacy Shield.

Please **contact us** if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

Data retention

How long will you use my personal data for?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

Details of retention periods for different aspects of your personal data are available in our retention policy which you can request from us by **contacting us**.

In some circumstances you can ask us to delete your data: see [*Request erasure*] below for further information.

Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data:

- [*Request access to your personal data*].
- [*Request correction of your personal data*].
- [*Request erasure of your personal data*].
- [*Object to processing of your personal data*].
- [*Request restriction of processing your personal data*].
- [*Request transfer of your personal data*].
- [*Right to withdraw consent*].

If you wish to exercise any of the rights set out above, please **contact us**.

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

Glossary

LAWFUL BASIS

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by **contacting us**.

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Comply with a legal or regulatory obligation means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

THIRD PARTIES

External Third Parties

Service providers acting as processors based in The Channel Islands, The United Kingdom or The Republic of Ireland or Mauritius who provide IT, Web based operational and accounting systems, administrative support and system administration services.

Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors, compliance consultancy providers and insurers based The Channel Islands, The UK or The Republic of Ireland who provide consultancy, banking, legal, insurance and accounting services.

HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in The Channel Islands, The United Kingdom or The Republic of Ireland who require reporting of processing activities in certain circumstances.

YOUR LEGAL RIGHTS

You have the right to:

Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer

require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

Declaration



Terms of Business & Privacy Notice

- I/we hereby acknowledge and confirm I/we carefully read, considered and understood the above Terms of Business/Privacy Notice, and confirm by my/our signatures that I/We have read, understood and agree with these terms.
- I am aware of my/our rights under the General Data Protection Regulation (GDPR) and have given my express consent to be contacted in relation to my/our financial requirements.
- I have given consent for you to hold my/our personal data as contained within the client record and to share it with other companies for the express purpose of the arrangement and administration of financial products.
- I am aware that I have the right to request access to information that the adviser holds on me/us. I also have the right to request that personal data held on me/us is rectified or erased, or object to processing as well as the right to portability.

Signed _____

Name _____

Date _____

Signed _____

Name _____

Date _____