



Succession Privacy Notice

We are committed to protecting and respecting your privacy.

As part of this commitment, we want you to know our principles and practices for collecting, using, storing, and disclosing your personal information.

Please read this notice carefully as contains important information on who we are, how and why we collect, store, use and share personal information generally, your rights in relation to your personal information and how to contact us and supervisory authorities in the event you have a complaint.

By consenting to us processing your special category personal information, you are giving us permission to perform the actions referred to in this notice.

Who we are

When we use “we”, “our” or “us” in this notice, we mean one or more of the Succession Group companies listed below:

- Succession Group Ltd. Data controller registration number Z3428994
- Succession Wealth Management Ltd. Data controller registration number ZA005958
- Succession Financial Management Ltd. Data controller registration number Z6929129
- Succession Employee Benefit Solutions Ltd. Data controller registration number ZA045311

We collect, use and are responsible for certain personal information about you. When we do so we are regulated under the UK General Data Protection Regulation and responsible as ‘controller’ for that personal information.

Scope

This notice relates to all data subjects whose personal information is processed by us.

Please refer to our Website Privacy Policy for information on how personal information is processed in relation to your use of our website.

Our collection and use of your personal information

We collect personal information about you when you enquire about or use one of our services. This

information may be provided by you directly, or with your consent, via a third party.

We are committed to ensuring that the personal information we collect and use is appropriate and does not constitute an invasion of your privacy.

We may process both manually and by electronic means your personal information including details of your name, address, date of birth, your marital status and details of dependents, your employment status, your income, investments, pensions and liabilities, your tax status and other associated tax details, any life assurance you hold or inheritance tax plans, details of your will, powers of attorney or other legal documents, any identity verification documentation or any other information necessary to provide the service you have requested.

We will use this information:

- to carry out our obligations arising from any contracts entered into between you and us and to provide you with the information and services that you request from us;
- for the purposes of providing advice, administration, transacting and management or any other purpose necessary for the service you have requested; and
- to meet any necessary legal and regulatory obligations.

We may, with your explicit consent, contact you or pass your details to other companies associated with us to contact you (including by telephone) with details of any other similar products, promotions, or for related marketing purposes in which we think you may be interested.

Special category personal information means information revealing racial or ethnic origin, political opinions, religious beliefs, philosophical beliefs or trade union membership, genetic and biometric data and data concerning health, sex life or sexual orientation. We will only process special category personal information with your explicit consent.

Our use of children’s personal information

Generally, we would only process a child’s name and date of birth, unless further details were required to fulfil a service that you have specifically requested, such as to establish investments for or on behalf of the child, school planning purposes or to establish health or life insurance. Whenever we



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collate information for children, we would always explain why the information is needed. Where a child is party to the contract, we would always consider the child's capacity to understand the contract they are entering into.

We will never use the child's personal information for marketing purposes.

Our legal basis for processing your personal information

We are required by law to have a specific reason for collecting and using your personal information. We will only process your information where we have a valid reason to do so under data protection legislation as follows:

- Contract - we will process your personal information for the purpose of fulfilling our contractual obligations to you or to meet a pre-contractual request.
- Consent - we will only process your special category personal information with your explicit consent.
- Legal basis - in some circumstances we are permitted by law to process your personal information.
- Legitimate interests - we may use your personal information for our, or a third party's legitimate business interests. When we process personal information to meet our legitimate business interests we put in place robust safeguards to ensure that your privacy is protected and to ensure that our legitimate interests are not overridden by your interests or fundamental rights and freedoms.

Who we share your personal information with

We use more than one company in our group to deliver our services. We may share your personal information with other Succession group companies as part of our commitment to offer you services.

We may share your personal information with product providers, our compliance consultants, the FCA or any other regulatory, statutory, governmental, industry bodies including, where relevant, solicitors and/or other debt collection agencies for debt collection purposes and carrying out operations on the information or data.

We use third party companies to provide services

so we can deliver a service to you. For example, IT systems and software and associated support services to ensure they continue to operate effectively and compliance consultants.

We may disclose your personal information to anyone in the future who may buy or merge with our business. If we merge with another company or if we are sold then we will need to share your information with the other party.

In the event of a sale of any part of our business we may have to pass your personal information to another party in a transaction where it is not possible to separate it from the information we need to pass to them. We will only do this where there is not a viable alternative.

Where we store your personal information

We take the security of your data very seriously and follow best practice on data security.

If personal information is processed outside of the UK, we will ensure that we put in place appropriate safeguards to protect personal information, such as, appropriate contractual arrangements and assurances including (but not limited to) recognised certification schemes, such as, the US Privacy Shield.

Product Providers, Lenders and Investment Managers may administer your policy, any existing policies you may have with them and provide other services, from centres in countries outside Europe (such as India and the USA) that do not always have the same standard of data protection laws as the UK. However, they are required to put a contract in place to ensure that your information is adequately protected, and they will remain bound by their obligations under the Regulation even when your personal information is processed outside Europe.

Steps are taken to ensure that the information is accurate, kept up to date and not kept for longer than is necessary. Measures are also taken to safeguard against unauthorised or unlawful processing, accidental loss, destruction or damage to the data.

How long will you keep my personal information?

We will keep your personal information securely for as long as is necessary for the purpose it was collected.

Generally, we will retain most personal information for the duration of the relationship and time limits



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are applied thereafter, based on the type of data. Some records need to be retained indefinitely to meet FCA regulation.

Our Data Retention policy is available upon request. Actual retention periods may vary depending on each individual's circumstances, but we would always inform you as part of our privacy information obligations.

Your Rights

Under the General Data Protection Regulation you have a number of important rights. In summary, those include rights to:

- access to your personal information and to certain other supplementary information that this notice is already designed to address
- require us to correct any mistakes in your information which we hold
- require the erasure of personal information concerning you in certain situations
- receive the personal information concerning you which you have provided to us, in a structured, commonly used and machine-readable format and have the right to transmit those data to a third party in certain situations
- object at any time to processing of personal information concerning you for direct marketing
- object to decisions being taken by automated means which produce legal effects concerning you or similarly significantly affect you
- object in certain other situations to our continued processing of your personal information
- otherwise restrict our processing of your personal information in certain circumstances

For further information on each of those rights, including the circumstances in which they apply, see the Guidance from the UK Information Commissioner's Office (ICO) on individuals rights under the General Data Protection Regulation.

Before we can exercise your rights or release personal information, we will always undertake checks to verify your identity.

Access to your personal information will be provided free of charge, unless the request is manifestly unfounded, excessive or repeated. If a fee is charged, this will only reflect the costs incurred in delivering the information.

Contact Us

We would be happy to answer any questions, comments, requests or concerns you may have about the way we use your personal information. If you wish to contact our Data Protection Officer, please send an email to dataprotection@successionwealth.co.uk or write to Succession Wealth, 60 Church Street (7th Floor), Birmingham B3 2DJ or call 0121 212 9212. You also have the right to lodge a complaint to the Information Commissioner's Office at ico.org.uk or by calling 0303 123 1113.

Changes to this notice

Any changes we may make to this notice in the future will be posted on this page. Please check back frequently to see any updates or changes. The most recent update was made in November 2020.