



WM Capital Management's Data Protection & Privacy Policy

- 1.1 WM Capital Management Limited may collect, use and store personal information about you and about your relationship with us and our associates. When we do so we are required to comply with General Data Protection Regulation (GDPR) and we assume the role of Data Controller, meaning that we determine the purposes and means of processing your personal data.
- 1.2 WM Capital Management Limited may share your personal data with James Brearley. Clause 44 of their Investor Terms document outlines how they will handle such information, their Privacy Policy providing more details, which is available at [http://jbrearley.co.uk/ Privacy%20Policy.pdf](http://jbrearley.co.uk/Privacy%20Policy.pdf)
- 1.3 In the course of providing services to you, we may collect, use and store the following personal data:
- Your contact information.
 - Identity information.
 - Financial information.
 - Employment details.
 - Information about your lifestyle.
 - Health information.
 - Details of any vulnerability.
 - Details of your dependents and/or beneficiaries under a policy.
 - Information about any existing products and policies.
- 1.4 There are certain types of personal data which are considered more sensitive and, therefore, are subject to additional levels of protection under the GDPR. These are known as "special categories of data" and include data concerning your health, racial or ethnic origin, genetic data and sexual orientation. We must have your explicit consent before we can process this type of data.
- 1.5 We may use the information we collect about you for the following purposes:
- Processing your application.
 - Verifying your identity.
 - Meeting our obligations under any applicable rules.
 - Providing the services to you under the agreement.
 - Administering your account and for customer service.
 - Product analysis and market research purposes.
 - To maintain records of any services or advice provided to you by us in order to defend legal claims or complaints.

1.6 The lawful bases upon which we collect, use and store your personal data are as follows:

- Performance of a contract; your explicit consent will be required in respect of special category data.
- Legitimate interests.

1.7 We may keep copies of any correspondence you send to us and copies of any documents you provide to us, including those which are used to verify your identity, such as your passport.

1.8 We only retain your personal data for so long as it is necessary to fulfil the purpose for which it was collected. We regularly review our retention policy in order to ensure that we do not keep personal data for any longer than necessary or we are legally required to.

1.9 We may share your information with our associates if they provide products or services to you, and in such instances will have a Data Transfer Agreement in place. We may also share your personal data with credit reference agencies and UK and overseas law enforcement agencies or regulatory authorities.

1.10 The information that we hold about you is confidential and will not be used for any purpose other than in connection with the provision of services to you, unless it is information that is already publicly available.

1.11 Under the General Data Protection Regulation, you have legal rights in respect of your personal data, which fall into the following categories:

- To access personal data.
- To correct/erase personal data.
- To restrict how we use personal data.
- To object to how we use personal data.
- To ask us to transfer personal data to another organisation.
- To find out more about how we use personal data.

1.12 Under the right to access, you have the right to obtain the following from us:

- Confirmation that we are processing your personal data.
- A copy of your personal data.

We will not charge a fee to comply with your request, unless we believe it is manifestly unfounded or excessive; in this instance we reserve the right to charge a reasonable fee for the administrative costs of complying with the request. We also reserve the right to charge a reasonable fee if you request further copies of your data following the initial request.

In order to comply with the GDPR, we will act on any access requests without undue delay and at the latest, within one month of receipt. We will calculate the time limit from the day after you receive the request (whether the day is a working day or not) until the corresponding calendar date in the following month. We may need to extend the time it takes to respond to your request by a further two months if your request is complex or if you have made a number of requests. If this is the case, we will let you know within one month of receiving your request and explain why the extension is necessary.

1.13 WM Capital Management Ltd is registered with the Information Commissioners Office for the protection and security of personal data.

WM Capital Management Ltd is authorised and regulated by the Financial Conduct Authority and recorded in the register under reference no 601025. Its company number is 07042526 and its registered office is 80 Coleman Street, London EC2R 5BJ.

