

WILLIAM & PARTNERS

PRIVATE INVESTMENT OFFICE

Data Privacy Policy

April 2026

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William & Partners PIO Limited is an Appointed Representative of Westlain Wealth Management Ltd, which is authorised and regulated by the Financial Conduct Authority (FCA).
Westlain Wealth Management Ltd's FCA register number is 911599.

“William & Partners”, “we”, “us” and “our” means William & Partners PIO Limited. William & Partners is a dynamic investment advisory firm. William & Partners is regulated by the Financial Conduct Authority and registered as a data controller with the Information Commissioners Office (“ICO”). Our ICO registration number is ZB583805. Our registered office is at First Floor 1 Des Roches Square, Witan Way, Witney, Oxfordshire, United Kingdom, OX28 4BE.

For the purposes of data protection law, we are a controller in respect of your personal data. William & Partners is committed to protecting your privacy and ensuring you are fully aware of the information we may hold on you and how that information might be used in the course of providing our services (the “Services”) to you.

This Privacy Notice applies to you if you are:

- ❖ an individual client of William & Partners;
- ❖ an individual representative of a client of William & Partners;
- ❖ a prospective client (either individual or representative) of William & Partners or otherwise enquiring with or contacting us;
- ❖ visiting our website or using any of our other online services; or
- ❖ other individuals we deal with in the course of providing Services.
- ❖ This policy (together with our Terms of Business) explains how we collect and safeguard your personal data.
- ❖ Please take the time to read and understand this Privacy Notice.
- ❖ Personal data we collect or generate about you

a) Information that you provide to us

We collect personal data as part of our due diligence and onboarding process regarding both existing and prospective clients. The process includes the collection of physical forms of identity and address verification such as copies of passports, driving license or other legal documents from you.

You may provide additional information by corresponding with us via phone, email, or other means including interactions with our website or our dedicated client portal where we have granted you access.

The information you provide may include your (and / or your client’s) name, (residential and / or work) address, (work and / or personal) email address, phone number(s), work status, marital status, number of dependents, date and place of birth, relevant information about your background, financial information needed from us to provide our Services including tax-related information (such as national insurance number), financial summary, net worth, annual income, account details, holdings, investments, transactions and data on real assets, preferences relating to the Services, marketing preferences, objectives and / or other relevant personal details you choose to share with us. We will avoid requesting or holding special categories of personal data about you (racial or ethnic origin, political opinions, religious beliefs trade union membership, genetic or biometric data, physical or mental health or condition, sexual life or sexual orientation) or personal data relating to criminal convictions or offences except where necessary to comply with our regulatory obligations, where you volunteer such information to us or where we otherwise have a lawful basis to process it.

By sharing your details with us, you confirm that you are willing to share your personal data. Where you are sharing an individual's details on their behalf, you confirm that you have received the necessary authorisations, or are otherwise legally entitled, to share such information and have provided any required information or notices to that individual or such individuals.

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.

Where we need to collect personal data by law, to carry out your instructions, or under the terms of our engagement with you (as set out in our terms of business, application form or otherwise), and you fail to provide that data when requested, we may be delayed or unable to perform all or part of our Services to you.

b) Information we collect or generate about you

Based on the information you provide, we may record further information to help us provide our Services to you, including your financial and risk profile, investor experience, objectives and any other information needed to help us provide our Services.

We may monitor or record phone calls, video calls, emails and chat applications in case we need to check we have carried out your instructions correctly, to resolve queries or issues, for compliance with regulatory requirements, to help improve our quality of service, and to help detect or prevent fraud or other crimes. Conversations may also be monitored or reviewed for staff training purposes.

c) Information we gather from other sources

In the process of gathering information on you as a prospective client, or providing Services to you, we will engage with a range of third party providers such as credit and fraud prevention agencies in order to gather relevant data about you and your circumstances as well as gathering intelligence from publicly available sources. These agencies may also give us additional details and information from the Electoral Register in order to aid identify verification.

If you have authorised a third party to contact us, or authorised us to contact a third party on your behalf, you acknowledge we may receive and store additional information they provide to us. When dealing with any third party in relation to your details we will ensure we implement appropriate security measures.

d) Anonymised data

We may also collect, use and share from time to time anonymised data such as statistical or demographic data for any purpose. Anonymised data could be derived from your personal data but is not considered personal data in law as this data will not directly or indirectly reveal your identity

Retention period

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements or any legitimate business purposes. We may retain your personal data for a longer period if the circumstances are justified, for example in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you. When it is no longer necessary to retain your personal data, we will securely delete or anonymise it in accordance with our data retention practices.

How we use your information

We will continually review and assess the quality and quantity of personal data we hold, and observe your rights in accordance with applicable privacy and data protection laws. Where we provide investment services you acknowledge personal data will be shared with your underlying custodian on an ongoing basis.

Information that we collect about you may be used in the following ways (though this is not necessarily an exhaustive list) and for the relevant lawful bases set out accordingly:

- ❖ to check whether we can provide our Services to you and carry out all of our regulatory compliance requirements, including carrying out anti-money laundering checks, detecting financial crime, fraud prevention, credit reference and other relevant background checks. These are necessary for us to comply with our legal or regulatory obligations or otherwise for our legitimate interests to ensure we are vetting our clients appropriately, detect and prevent offences and to protect our business;
- ❖ to deliver our Services to you including (but not necessarily limited to) investment advice, arranging deals in investments and / or making arrangements with a view to transactions in investments, providing inheritance tax planning and / or any other Services we agree with you. We also need to communicate with you, and manage our relationship with you, as necessary to deliver our Services and maintain client relations. These are necessary for the performance of our contract with you or otherwise for our legitimate interests to deliver our Services, manage client relations, manage payments, investments and transactions and recover debts due to us.
- ❖ to provide you with information (by various means including but not limited to post, email and phone), products and services that you have requested from us. It is in our legitimate interests to respond to your queries, offer a good and responsive service and provide any information requested in order to generate and develop business or which we may reasonably believe would be of interest to you
- ❖ to use your contact details to send you alerts, newsletters, announcements, invitations to events, updates or other business, financial, tax or legal developments which may be of interest to you. We may rely on your consent to send you marketing. In particular, when onboarding you as a client, as part of your application, we ask that you specify your marketing preferences. Where we do not rely on consent, and to the extent legally permitted, we send marketing where it is necessary for our legitimate interests to market our services in order to promote and grow our business. You can always opt out of receiving direct email marketing communications by following the unsubscribe link in the email or by contacting us;
- ❖ to carry out associated administration, record keeping and accounting in connection with your matters as necessary to perform our contract with you or for our legitimate interests in ensuring appropriate records are kept, and other processing necessary to comply with our professional, legal and regulatory obligations;
- ❖ to comply with our internal business policies and for operational reasons, such as improving efficiency, training and quality control. It is in our legitimate interests to adhere to our own internal procedures so that we can deliver an efficient service to you;
- ❖ to address any complaints or claims and/or to enforce legal rights or defend or undertake legal proceedings. This is necessary for our legitimate interests to manage our client relationships or otherwise necessary for the establishment, exercise or defence of legal claims;
- ❖ to protect the security of our systems and data used to provide services and to prevent unauthorised access and modifications to our systems. This is necessary to comply with our legal or regulatory obligations (where applicable) or otherwise as necessary for our legitimate interests to prevent and detect activity that

could be damaging for us, you and/or anyone else;

- ❖ to assist with external audits and quality checks as necessary to comply with legal or regulatory requirements. Otherwise, we may participate in these as necessary for our legitimate interests in maintaining our accreditations so we can demonstrate we operate at the highest standards;
- ❖ for research and development of products and services. Such processing is necessary for our legitimate interests in better understanding our products and services to help promote, develop and grow our business;
- ❖ to notify you about changes to our website, terms or policies and other administrative information. This is necessary for our legitimate interests to ensure that any changes to our policies and other terms are communicated to you;
- ❖ to allow you to participate in any interactive site features, which we may make available, should you choose to do so; to ensure that content of our website or client portal is presented in the most efficient manner for you and your computer or device; to administer our site and portal including troubleshooting, data analysis, testing, research, statistical and survey purposes; and to keep our online services safe and secure. For all these uses, these are necessary for our legitimate interests to monitor and improve our online services and your experience of them and to ensure network security.
- ❖ to the extent not covered above, otherwise as needed to comply with any legal or regulatory requirements to which we are subject.

We may also use your personal data to provide information relating to services of carefully selected associates or affiliates of William & Partners where you agree for us, or it is otherwise necessary, to share certain information with those parties. Where this occurs, those parties are also required to protect your personal data.

We rely on appropriate lawful grounds to use your personal data as detailed above. To summarise, we use your personal data in the ways described above because:

- ❖ we need to process your personal data in order to enter into, and perform, a contract with you;
- ❖ we have legal and regulatory obligations that we have to comply with;
- ❖ we may need to in order to establish, exercise or defend our legal rights or for the purpose of legal proceedings;
- ❖ in some cases, where you have given your consent; or
- ❖ the use of your personal data as described is necessary for our legitimate interests (or the legitimate interests of one or more of our affiliates or another third party). Where we rely on legitimate interests, we consider any processing of personal data to be necessary for such legitimate interests and proportionate.

When we disclose your personal data

We may share your personal data with the parties listed below as needed for the purposes set out in the section above (how we use your information) or where required by law:

- ❖ to our directors, officers, personnel and consultants as necessarily required;

- ❖ to our group affiliate companies;
- ❖ to your underlying custodian on an ongoing basis;
- ❖ to our third party processors, service providers, and contractors that we use to make our business more efficient, including for our IT services, administrative services, cloud services, data storage/back-up and marketing;
- ❖ to any other professional advisors as needed in the course of our providing Services to you;
- ❖ if we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our Terms and Conditions and other agreements or to protect the rights, property, or safety of William & Partners, our clients, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction, or with law enforcement or regulatory agencies and in order to comply with any legal obligation, establish, exercise or defend our legal rights;
- ❖ in the event that we sell, transfer, or merge any parts of our business or assets, in which case we may disclose your personal data to the prospective buyer of such business or assets (and their respective advisors). Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then we will ensure you are notified accordingly, and any new owners may use your personal data in the same way as set out in this Privacy Notice; or
- ❖ with the relevant authorities, for example tax authorities, as necessary as part of the Services or where we are required to share relevant information;
- ❖ with our auditors, advisors and our regulator, the Financial Conduct Authority (FCA) in the course of their normal duties.

Transfers of your personal data outside the European Economic Area and/or the UK

To deliver our Services to you, your personal data may need to be disclosed to our service providers outside the European Economic Area (“EEA”)/UK or be processed by staff operating outside of the EEA/UK who work for our affiliates (where applicable) or for one of our suppliers or where there is otherwise an international aspect to the Services you have instructed us to carry out or where you are based outside the EEA/UK.

Where we transfer your personal data outside the EEA/UK, we will ensure that it is protected in a manner that is consistent with how your personal data would be protected by us in the EEA/UK. This can be done in a number of ways, for instance:

- ❖ the country that we send the data to might be deemed to ensure an adequate level of protection by the European Commission or UK Government (as applicable); or
- ❖ the recipient might have signed up to a contract based on “standard contractual clauses” approved by the European Commission or UK Government (as applicable), obliging them to protect your personal data.

In other circumstances the law may permit us to otherwise transfer your personal data outside the EEA and/or UK where an appropriate alternative legal ground applies. In all cases, however, we will ensure that any transfer of your personal data is compliant with data protection law.

You can obtain more details of the protection given to your personal data when it is transferred outside the EEA/UK

(including a copy of the standard data protection clauses which we have entered into with recipients of your personal data) by contacting us in accordance with the “Contact details” section below.

Cookies

Our websites use cookies to distinguish you from other users of our web site. This allows us to improve our site and provide an enhanced experience for our clients. For detailed information on the cookies we use and purposes for which we use them, please refer to our Cookie Policy.

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 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. Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted over the internet.

Your rights

Under certain circumstances, you have a number of legal rights in relation to the personal data that we hold about you. These rights include:

Right of access

You have the right to obtain information regarding the processing of your personal data and access to the personal data which we hold about you (commonly known as a ‘data subject access request’). We may refuse to comply with a subject access request (partly or wholly where applicable) if the request is:

- ❖ manifestly unfounded or excessive in nature;
- ❖ in relation to information in respect of which a claim to legal professional privilege could be maintained in legal proceedings;
- ❖ in respect of information in respect of which we owe a duty of confidentiality to other parties; and / or
- ❖ an alternative exception applies under applicable law.

Right to rectification

If you believe the data we hold is inaccurate or incomplete you are entitled to have this rectified, though we may need to verify the accuracy of the new data you provide to us.

Right to erasure

You have the right to request that we erase your personal data in certain circumstances. Please note that there may be circumstances where you ask us to erase your personal data but we are legally entitled to retain it. What we are required to delete and what we decide to retain will depend on the circumstances of the request.

Right to restriction

You have the right to request that we restrict our processing of your personal data in certain circumstances. Again, there may be circumstances where you ask us to restrict our processing of your personal data but we are legally entitled to continue processing your personal data and / or to refuse that request.

Right to object to processing

You also have the right to 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. Where you object on this ground, we shall no longer process your personal data unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defence of legal claims. You also have the right to object where we are processing your personal data for direct marketing purposes.

Right to data portability

In some circumstances, you have the right to receive some personal data in a structured, commonly used and machine-readable format and/or request that we transmit that data to a third party where this is technically feasible. Please note that this right only applies to personal data processed by automated means which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent

You can withdraw your 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 Services to you.

Please note that the above rights are not absolute, and we may be entitled to refuse requests, wholly or partly, where exceptions under applicable law apply. We may refuse a request for erasure, for example, where the processing is necessary to comply with a legal obligation or necessary for the establishment, exercise or defence of legal claims.

You can exercise any of your rights as described in this Privacy Notice and under data protection laws by contacting our Data Protection Officer (using the contact details provided at the end of this Privacy Notice).

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 manifestly unfounded or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

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. It will help us to process your request if you clearly state which right you wish to exercise, what personal information it is that is of particular concern to you and, where appropriate, why it is that you are exercising it.

We try to respond to all legitimate requests within one month. Occasionally it could 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.

Complaints

If you believe that we have processed your data in a way that does not comply with the GDPR you have the right to complain directly to the ICO. See the ICO's website at www.ico.org.uk/concerns or telephone 03031231113. We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact our Data Protection Officer in the first instance (using the contact details provided at the end of this Privacy Notice). Where we receive a complaint relating to the processing of your personal data, we will acknowledge receipt of the complaint no later than 30 days from when we received the complaint and, without undue delay, take appropriate steps (making enquiries into the subject matter of the complaint, to the extent appropriate) to respond to the complaint, keeping you up-to-date on the progress and informing you of the outcome of the complaint.

Third party links

Our site may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates ('Third Party Sites'). If you follow a link to any of these Third Party Sites, please note that these Third Party Sites have their own privacy policies and that we do not accept any responsibility or liability for these policies. We recommend that you check these policies before you submit any personal data to these Third Party Sites.

Changes to the notice

Any future changes to our Privacy Notice or to other policies found on our site will be posted to the relevant pages, and where appropriate, notified to you.

Contact details

If you have any questions, comments and requests regarding this Privacy Notice please contact our Data Protection Officer at:

will@williampartners.co.uk or telephone: 01295 698 496.

Alternatively, you can write to us at 48 Bloxham Mill, Barford Road, Bloxham, Banbury, OX15 4FF