



General Data Protection Regulation Privacy Statement

The European Union has taken a step in protecting the fundamental right to privacy for every EU resident with the General Data Protection Regulation (GDPR), which will be effective from May 25, 2018. All EU residents will now have greater say over what, how, why, where, and when their personal data is used, processed, or disposed. This rule clarifies how the EU personal data laws apply even beyond the borders of the EU. Any organisation that works with EU residents' personal data in any manner, has obligations to protect the data. More details on the GDPR can be found on the Information Commissioners Office (ICO) Website.

BlackStar Wealth Management Ltd's Commitment

At BlackStar Wealth Management Ltd, we have always honoured our users' right to data privacy and protection. We have never relied on advertising and have no necessity to collect and process users' personal information beyond what is required for the functioning of our services. We already have strong Data Processing Agreements and Privacy Policies, which we are reviewing to ensure they meet the requirements of the GDPR. We recognise that the GDPR will help us move towards the highest standards of operations in protecting customer data.

How is BlackStar Wealth Management Ltd preparing for GDPR?

As a data controller, BlackStar Wealth Management Ltd understands its obligation to be compliant with GDPR. We are in the process of identifying our GDPR requirements and reviewed our internal processes to ensure that we will remain compliant and employing best practices at all time.

The most important aspect of GDPR is how the collected data is used. As a data controller, BlackStar Wealth Management Ltd's key role is to ensure that we only collect the data that is necessary to provide our services, and that we effectively manage and protect that data whilst it is being stored and processed by BlackStar Wealth Management Ltd.

We are reviewing all of the data that we hold and our process to ensure that we meet the requirements of GDPR and have the appropriate level of safeguards in place.

Information we may collect from you

We may collect and use the following personal information about you:

You may give us information by filling in forms, or corresponding with us by phone, email, writing or otherwise. The information you give us may include your name, address, email address and other contact information, financial information including existing investments and savings, information regarding any liabilities and bank details.

You will give us this information when you

- Apply for products and services.
- Talks to us on the phone or other means
- Use our online portals or other methods
- In emails and letters
- In financial reviews and interviews

Information we receive from other sources

We may receive personal information from third parties that we work with including

- Companies that introduce you to us
- Financial Advisers
- Insurers
- Credit Reference agencies
- Public information sources such as Companies House
- Agents working on our behalf
- Market researchers
- Government and law enforcement agencies
- Regulatory bodies

Using your information

Your personal information will be used for the purposes of providing financial advice and the administration and management of investments. Under data protection law we can only use your personal information if we have a proper reason for doing so. A proper reason could be when we have:

- Your consent
- It is necessary to enter into or perform a contract
- It is necessary to comply with a legal obligation
- When it is in our legitimate interests

Where we rely on our legitimate interests we mean our:

- Pursuit of our commercial activities and objectives or those of a third party
- Compliance with applicable legal and regulatory obligations and any codes of conduct
- Improvement and development of our business operations and service offering, or those of a third party

Who we share your personal information with

We may share the personal information we hold about you.

For the purposes set out above, we may share your information with selected third parties including:

- governmental or judicial bodies or agencies such as:
 - HM Revenue & Customs
 - Financial Conduct Authority
 - UK Financial Services Compensation Scheme
 - other regulatory bodies and authorities
- fraud and anti-money laundering prevention agencies, other companies and organisations to prevent or detect financial and other crime such as:
 - National Crime Agency (NCA)

- credit reference agencies for the purpose of client banking identification such as:
 - Experian
- data, service and software providers that assist us in the improvement and optimisation of our sites
- any party linked with you or your business's product or service
- organisations that introduce you to us
- companies you ask us to share your data with.

Fraud Prevention Agencies (FPAs)

We may need to confirm your identity before we provide products or services to you or your business. Once you have become a client of ours, we will also share your personal information as needed with Fraud Prevention Agencies to help detect fraud and money-laundering risks.

We will use the information to:

- Confirm identities
- Help prevent fraud and money-laundering
- Fulfil any contracts you or your business has with us.

We or an FPA may allow law enforcement agencies to access your personal information. This is to support their duty to detect, investigate, prevent and prosecute crime.

The information we share with the FPA

These are some of the kinds of personal information that we share with the FPAs:

- Name
- Date of birth
- Residential address
- History of where you have lived
- Contact details, such as email addresses and phone numbers
- Financial data
- Data relating to your or your business's products or services
- Employment details, (where provided)

We and FPAs may process your personal information in systems that look for fraud by studying patterns in the data. This might mean that we find that an account is being used in ways that fraudsters work or we may notice that an account is being used in a way that is not normal for you or your business. Either of these could indicate a possible risk of fraud or money-laundering.

How this can affect you

If we or an FPA decide there is a risk of fraud, money laundering, or another aspect of financial crime, we may stop activity on your accounts or block access to them. FPAs will also keep a record of the risk that you or your business may pose.

This may result in other organisations refusing to provide you with products or services, or to employ you

Data transfers out of the EEA

FPAs may send personal information to countries outside the European Economic Area ('EEA') including the United States of America to firms that adhere to the US Privacy Shield Framework. When they do, there will be a contract in place which contains clauses that have been approved by the European Commission as adequately protecting your personal information.

Marketing

We may use your personal information to tell you about relevant products and offers. This is what we mean when we talk about 'marketing'.

We will only contact you for marketing purposes if you have provided your explicit consent for us to do so.

The personal information we hold for you is made up of what you tell us, and data we collect when you use our services, or from third parties we work with.

We study this to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you.

You have the right to ask us not to process your personal information for marketing purposes. You can exercise your right to prevent such processing by contacting us by phone, post or email using the details in the "Contact Us" section below. You can also unsubscribe from marketing communications by following the unsubscribe instructions included in every email or by logging into your client site and changing the marketing preferences within the Settings menu.

Whatever you choose, you'll still receive statements, and other important information such as changes to your existing products and services.

We may ask you to confirm or update your choices if you take out any new products or services with us in future. We will also ask you to do this if there are changes in the law, regulation, or the structure of our business.

If you change your mind you can update your choices at any time by contacting us

Using your Personal Information

We have set out our reasons for using your personal information in the table below under the legal basis. Where we rely on our legitimate interests, we have set out those interests in the table below.

Purpose	Legal basis
To provide you with any services and/or information you request from us (which includes carrying out any obligations arising from any contracts entered into between you and us).	To fulfil our contractual obligations.
To comply with any instructions, you give to us.	To fulfil our contractual obligations.
To notify you about changes to our service.	It is in our legitimate interests to use your personal information for this purpose.
To provide you with information by post, email, telephone or otherwise about products and services of a similar nature to those you have previously purchased or expressed an interest in which we think may be of interest to you.	We rely on your consent to send you these communications.
To administer our sites and for internal operations, including troubleshooting, data analysis, load management, testing, research, statistical and survey purposes.	It is in our legitimate interests to use your personal information for this purpose.
To improve our sites to ensure that content is presented in the most effective manner for you and for your computer.	It is in our legitimate interests to use your personal information for this purpose.
To obtain your feedback on a product, service or our sites via a third party appointed by us.	It is in our legitimate interests to use your personal information for this purpose.
As part of our efforts to keep our sites safe and secure and to prevent and detect money laundering, financial crime and other crime.	Comply with our legal obligations
To prevent and detect fraud, including to share your personal information with Fraud Prevention Agencies for this purpose.	It is in our legitimate interests to use your personal information for this purpose. This may in some circumstances be necessary for us to comply with our legal obligations.

Data privacy and data security are two sides of the same coin. BlackStar Wealth Management Ltd recognise this fact and as part of becoming ready for GDPR we are reviewing the security of our Web Applications to ensure that we have the correct level of security measures in place to protect the customer data that we hold.

If you choose not to give personal information

We may need to collect personal information by law, or under the terms of a contract we have with you.

If you choose not to give us this personal information, it may delay or prevent us from meeting our obligations. It may also mean that we cannot perform services needed to run your accounts or policies. It could mean that we cancel a product or service you have with us.

Any data collection that is optional would be made clear at the point of collection.

How long we keep your personal information

We will keep your personal information for as long as you are a client of BlackStar Wealth Management Ltd.

After you stop being a client, we may keep your data for a period of time for one of these reasons in relation to any ISA, GIA, On/Offshore Bond, Mortgage, Life Insurance:

- To respond to any questions or complaints
- To show that we treated you fairly
- To maintain records according to rules that apply to us
- To comply with relevant FCA record keeping requirements

For any pension products you may hold, we are required to retain data relating to these indefinitely.

We may keep your data for longer than the period of time if we cannot delete it for legal or regulatory reasons. If we do, we will make sure that your privacy is protected and only use it for those purposes.

Access to your information

You have the right to request a copy of the personal information we hold about you, subject to certain exemptions.

If you would like a copy of some, or all, of this information you may contact us using the details below

We will NOT charge a fee for providing you with this information.

Letting us know if your personal information is incorrect

If any of the information we hold about you is inaccurate or incomplete, you can ask us to make any necessary amendments to your data.

Please contact us if you want to do this using the details below.

If you do, we will take reasonable steps to check its accuracy and correct it.

What if you want us to stop using your personal information?

You have the right in certain circumstances to object to our use of your personal information, or to ask us to delete your personal information or ask us to suspend our use of your personal information.

There may be legal or other official reasons why we need to keep or use your personal information. But please tell us if you think that we should not be using it and we will consider this.

If you want to object to how we use your data, or ask us to delete it or restrict how we use it or, please contact us using the details below.

How to withdraw your consent

You can withdraw any consent you have given us at any time. Please contact us if you want to do so.

If you withdraw your consent, we may not be able to provide certain products or services to you. If this is so, we will tell you.

What if I have a complaint?

You have the right to complaint to the Information Commissioner's Office where you think we have not used your personal information in accordance with data protection law. Details of how to do this can be found on www.ico.org.uk.

Safeguarding your personal information

Keeping your personal information safe is very important to us so we will take all steps necessary to ensure that your personal information is treated securely and in accordance with this Privacy Notice and applicable data protection legislation.

Once we have received your personal information, we will use strict procedures and security features to prevent unauthorised access.

Our Email host is 1&1 which we understand is GDPR-ready. Our Data Storage is on an encrypted office-specific back-up physical hard drive, and 2 separate Cloud storage facilities, True Potential and Dropbox for Business. Any transfer of Sensitive Data transfer would be by preference to and from you via your own True Potential Client Portal created by us.

Where do we use and store your personal information?

We will use and store your personal information both inside and outside the European Economic Area ('EEA') including to organisations located within the United States of America that adhere to the US Privacy Shield Framework.

If we do transfer information to our agents outside of the EEA, we will make sure that it is protected in the same way as if it was being used in the EEA.

Links to external websites

Our sites may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. We will only ever support links to reputable companies who maintain the highest standards of data security in line with the GDPR.

If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies or how such websites collect and use your personal information. Please check these policies before you submit any personal information to these websites.

The GDPR provides the following rights for individuals

- The right to be informed
- the right of access,
- the right to rectification,
- the right to erasure
- the right to restrict processing,
- the right to data portability,
- the right to object and
- rights in relation to automated decision making and profiling

Changes to our privacy notice

We reserve the right to revise or supplement this Privacy Notice from time to time. We will place updates on our sites, inform you of the updates and where appropriate we will give you reasonable notice of any changes.

If you have any questions relating to GDPR compliance please contact us at info@blackstarwm.co.uk

BlackStar Wealth Management Limited

Authorised and regulated by the Financial Conduct Authority

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