



Privacy Notice

The information you have provided is subject to the General Data Protection Regulation (Regulation (EU) 2016/679 GDPR). The Privacy Notice confirms how our firm processes your data in a concise transparent and easily accessible way.

By signing this document, you consent to us or any company associated with us, for example product providers or platforms we may use to provide you with our services, processing your personal data, both manually and by electronic means.

“Processing” includes obtaining, recording or holding information or data, transferring it to other companies associated with us, product providers, the Gibraltar Financial Services Commission (“GFSC”) or any other statutory, governmental or regulatory body for legitimate purposes including, where relevant, to solicitors and/or other debt collection agencies for debt collection purposes and carrying out operations on the information or data.

In order to provide services to you we may be required to pass your personal information to parties located outside of the European Economic Area (EEA) in countries that do not have Data Protection Laws equivalent to those in Gibraltar. Where this is the case we will take reasonable steps to ensure the privacy of your information.

The information provided may also contain sensitive personal data for the purposes of the Act, including information that relates to your physical or mental health or condition; the committing or alleged committing of any offence by you; any proceedings for an offence committed or alleged to have been committed by you, including the outcome or sentence in such proceedings.

You may be assured that we and any company associated with us will treat all personal data and sensitive personal data as confidential and will not process it other than for a legitimate purpose. Steps will be taken to ensure that the information is accurate, kept up to date and not kept for longer than is necessary.

If we provide you with financial advice, your data will be kept in accordance with GFSC regulatory expectations, which in some cases mean the duration could be indefinite.

Measures will also be taken to safeguard against unauthorised or unlawful processing and accidental loss or destruction or damage to the data.

Your right to a copy of your personal data

Subject to certain exceptions, you are entitled to have access to your personal and sensitive personal data held by us. You will not be charged for us supplying you with such data, however we do reserve the right to apply a ‘reasonable fee’ where requests are deemed excessive. We will respond to your request as soon as possible and within the maximum time frame of one month.

We can refuse requests that are manifestly unfounded or excessive, in this case we would tell you why and you will then have the right to complain to the supervisory authority and to a judicial remedy. You must do this without undue delay and at the latest, within one month of our notification to you.



Lawful basis for processing personal data

To enable us to process personal data we must have a 'lawful basis' as well as a purpose for processing. Processing data is necessary to achieve our purpose and as such we have a lawful basis.

To enable us to process your personal data we must seek your consent. Please note that your data will be used for the sole purpose of providing financial advice, administration and management. Primarily, we use your data and data about your family's circumstances to provide financial advice to you and complete transactions on your behalf. We analyse and assess your data to maintain and develop our relationship with you.

We may be required to share your data with our regulator and other third parties including our auditors or insurers.

The following should be noted:

1. Your data will be lawfully and fairly processed in a transparent manner
2. Your data is collected on the grounds of explicit and legitimate purposes only
3. We will only ask for your data when necessary, explain if data will be shared and how long it will be kept
4. Your data will be accurate, kept up to date and erased without delay should your data no longer be required for the purpose to be processed
5. Your data will only be retained for as long as necessary
6. Your data will be secure

Rights of the client

The points below clearly set out the rights each client is entitled to. Please ask us for an explanation of each should you wish to have more information.

1. The right to be informed
2. The rights of access
3. The right to rectification
4. The right to erasure
5. The right to restrict processing
6. The right to data portability
7. Rights to object
8. Rights not to be subject to automated decision making including profiling

Right to complain

In the event you believe your data has been wrongly processed, stored or handled you have the right to raise a concern with the Gibraltar Regulatory Authority ("GRA"). Details on how to do this can be found on the following link <http://www.gra.gi/data-protection>.

Data Breaches:

If as a firm, we breach our procedures we will report certain types of data breaches to the GRA and in some cases to individuals. Where such a breach is likely to result in a high risk and freedoms of individuals we will notify those concerned directly in most cases. We have strict procedures in place to detect, report and investigate breaches.



abacus

WEALTH MANAGEMENT

Communications and Marketing Preferences

Occasionally, we or associated parties may send you marketing/promotional communications via email, telephone or post. Recipients will be carefully selected, and information will only be sent where we or the associated party feel it to be appropriate. Should you wish to opt out in the future, you can do so at any time. Please indicate your preferences using the boxes below (by placing a tick in the appropriate box)

I would like to OPT IN to receiving marketing as detailed above	
I would like to OPT OUT of receiving marketing as detailed above	

If you choose to opt in, please tick how you would like us/associated parties to contact you:

Post		Email		Phone/SMS	
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You may inform us at any time if you want to change your options.

Client Consent under the GDPR

It is important that you give consent to how we deal with your data under the new GDPR rules. Such consent must be given freely, specifically, informed and unambiguous. You must make a positive opt in and as such, we ask you to sign and give your consent. This document is a standalone document and is issued separate to other terms and conditions contained in our client agreement. A copy of this privacy notice will be placed on your file.

I hereby give consent to Abacus Wealth Management Limited for my personal data to be processed in accordance with the General Data Protection Regulations (GDPR)

If at any time you wish to withdraw consent, for us or any company associated with us to cease processing your personal data or sensitive personal data or wish to offer your marketing preferences, please contact the Data Protection Officer Mr Robert Guest on +350 20042967, by email to dpo@abacuswealth.gi or in writing at Abacus Wealth Management Limited, 5-9 Main Street, Gibraltar, GX11 1AA.

Client name:	Client name:
Signed:	Signed:
Date:	Date: