



# Privacy Notice

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## About our Privacy Notice

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This Privacy Notice is laid out to inform you about how the Menzies Wealth Management Group may collect and process information that relates to you, how we aim to protect your information, your rights and how you can exercise those with us.

Menzies Wealth Management Limited is a provider of wealth management and employee benefit services. This privacy policy explains how we collect, use, and protect your personal information when you use our services, including:

- Wealth management
- Pension planning
- Protection
- Employee benefits
- MenziesConnect portal

We are committed to safeguarding your privacy and ensuring compliance with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, and relevant Financial Conduct Authority (FCA) requirements. This policy applies even after your relationship with us ends. It should be read alongside our service agreements and any other terms and conditions provided to you.

When we say, 'MWM', 'the Group' or 'we', this means Menzies Wealth Management Limited and all its companies/subsidiaries including Menzies Employee Benefits. Menzies Group refers to the parent company of Menzies LLP and all its companies/subsidiaries, which includes Menzies Wealth Management and Menzies Employee Benefits, all of whom may act as a data controller in respect of your personal data/information.

## Information we collect

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Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

### Types of personal data we collect:

We may collect, use, store and transfer different kinds of personal data about you, which we have grouped together as follows:

- **Identity data** – which may comprise your first name, last name, marital status, age, date of birth, work location, job title, national insurance number, and gender.
- **Financial data** – which may include your bank account and billing details. This may also include your salary information or additional information about your financial wealth management or employee benefit requirements where we are setting up Employee Benefit services for you, or for your employer on your behalf (please see below for further details).
- **Contact data** – which may comprise your address, email address and telephone number.
- **Transaction data** – which may contain details about payments to and from you and other details of products and services you have purchased from us.
- **Technical data** – which may contain your IP address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the device used to access our website.
- **Usage data** – which may contain information about how you use our website.
- **Marketing and communications data** – which may include your preferences in receiving marketing from us and third parties and your communication preferences.

### Special categories of personal data

We may need to collect certain sensitive information, or "Special Categories of Personal Data" (as it is termed under the Data Protection Act 2018 ("DPA 2018")) about you, and this may include details about your trade union membership or information about your health and genetic or biometric data. We will always be clear in

explaining when we are asking you to give us this information, why we need this information, and the purposes for which we will use it. We will always obtain your explicit consent to use any Special Categories of Personal Data about you unless we are otherwise required or permitted to do so by law.

We recognise that some of our clients may be in vulnerable circumstances, which could affect their ability to make informed decisions or represent their own interests. We are committed to treating vulnerable clients with extra care and sensitivity. This includes identifying potential vulnerability, adapting our communication methods and services as needed, and ensuring appropriate safeguards are in place to protect vulnerable clients' data and interests. We may process special category data related to vulnerability when necessary to adapt our communication methods, provide additional support in decision-making and ensuring appropriate safeguards for the data, in accordance with data protection regulations.

### **Anonymous or aggregated data**

We also collect, use and share "Aggregated Data" such as statistical or demographic data. Aggregated Data may be derived from your information but does not constitute "personal data" in law as it does not directly or indirectly reveal your identity. For example, we may aggregate (i.e. combine with information relating to others) your Usage Data to calculate the percentage of users accessing a specific feature of our website. However, if we combine or connect Aggregated Data with your information so that it can directly or indirectly identify you, we treat the combined data as personal data which will be handled in accordance with this Privacy Policy.

### **Information about connected individuals**

We may need to gather personal information about close family members and dependants in order to provide our services effectively. In such cases it will be your responsibility to ensure that you have the consent of the people concerned to pass their information on to us and you must make sure they have seen a copy of this privacy notice.

## **How we collect personal information**

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Depending on the nature of your contact with MWM, we may process different types of information about you and collect this information in different ways. We will only process your data where it is lawful to do so and we will only collect the minimum amount of information necessary to meet the purpose for which we intend to use that information, for example in order to provide you with the services you have engaged us for.

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with our services). Should this situation arise, we may have to cancel a product or service you have with us, but we will notify you if this is the case at the time.

Where you provide us with information about other people, you must make sure that they have seen a copy of this privacy notice and are comfortable with you giving us their information.

### **When you telephone us or write to us**

You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone and email or otherwise. Your employer may also give us your Identity, Contact and Financial Data where they are engaging our services on your behalf. For example, this includes personal data you provide when you (or, where appropriate, your employer on your behalf):

- apply for our products or services
- request marketing to be sent to you
- complete a survey or register for an event
- submit an enquiry to us; or
- participate in our complaints handling procedures

### **When you have a meeting conducted by Microsoft Teams**

We may record video calls conducted through Microsoft Teams for training and competency development purposes. Please note the following regarding our video call recording practices:

- Your consent will be obtained prior to any recording taking place
- All recordings will be stored securely and accessible only to authorised personnel
- Recordings will be retained for a maximum of 60 days, after which they will be permanently deleted

You have the right to withdraw your consent for recording at any time during the call. If you choose not to consent to recording, it will not affect your participation in the video call.

#### **When you have a meeting with a financial adviser**

We may utilise generative AI technology to assist in recording and summarising meetings conducted in person and through our platforms. This AI-powered tool helps generate meeting transcripts, summaries, and action items to enhance productivity and ensure accurate documentation. The AI-generated content will be treated with the same level of confidentiality as other meeting records. Participants have the right to opt out of AI-assisted recording at any time.

Upon withdrawal of consent, we will cease recording any future meetings with you. No further meeting recordings will be undertaken unless and until you grant consent to record again. Access to these AI-generated materials will be strictly limited to authorised personnel and used solely for internal purposes such as training, competency development, and improving our services.

#### **When you visit our website.**

As you interact with our website, we may automatically collect Usage Data and Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies.

A cookie, also known as a browser cookie, is a text file containing small amounts of information which a server may download to your computer hard drive, tablet or mobile device when you visit a website or use an app. We use cookies to track visitor use of our website and to compile statistical reports on website activity. For further information visit [www.allaboutcookies.org](http://www.allaboutcookies.org)

You can set your browser not to accept cookies and the above website tells you how to remove cookies from your browser. However in a few cases some of our website features may not function as a result.

Please see our [website cookie policy](#) for further details.

#### **When you contact us via social media**

When you contact us via social media outlets you are using applications that are outside of the control of MWM. We cannot guarantee the security of any communication made using social media and we advise that should you have any concerns that you look at the privacy policies that these applications publish.

#### **When you contact us via e-mail**

Menzies Group utilises full-disk encryption to protect electronically stored regulated or confidential data. It encrypts classified data during its processing, and uses encryption for data in transit and storage, as well as for databases containing regulated or confidential data.

Menzies applies encryption during data transit and at rest, ensuring that customer data, including emails, web traffic, and scoped data sent or received electronically through e-mail, chat, and other messaging technologies, is secure. Files containing regulated or confidential data are also protected with encryption. Encryption is applied to data backups during transit and while at rest, and mobile devices containing corporate data are encrypted. Scoped data sent or received electronically includes encryption of e-mail, chat, and other messaging technologies.

#### **Third party websites**

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website that you visit.

#### **When your employer contacts us regarding our Employee Benefits services**

Your employer may contact us to find out more about our employee benefits services. As part of an exchange of information between your employer and ourselves prior to any agreement taking place, we may need to obtain some information about you, and this may include certain Identity Data and Financial Data, in order to respond to this enquiry. This may include data such as, your age, salary information and work location. However, where possible, we will always request that any information we receive about you from your employer is anonymised and will only collect the minimum amount of information about you which is necessary to respond fully to any such enquiry.

If your employer enters into a contract with Menzies Employee Benefits to provide Employee Benefit services, we will need to collect further personal information in respect of all employees in order to fulfil the terms of that contract. This will always be limited to the minimum amount of information we require to provide those services. When personal data is transferred between Menzies Employee Benefits and your employer for any reason, we follow a strict process and have procedures in place to ensure that your data is always protected and kept secure.

### **When you visit our premises**

Our premises may operate CCTV systems for the purpose of prevention and detection of crime and protection of assets. Recordings may be taken in the reception areas and communal areas of our premises and will only be retained in accordance with our retention schedule. Signage will be displayed to ensure you are aware that recordings may be taking place. You can be assured that we will not record any meetings, confidential conversations, or any aspect of business dealings.

### **How we use your information**

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We will usually be a “data controller” in relation to the data we process. We will collect and use personal information about you in order to provide our services. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the commercial contract we are about to enter into or have entered into with you, or in order to take steps, at your request, prior to entering into the commercial contract.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests. In particular where we are taking steps to enter into or are fulfilling the terms of a contract we have with your employer in order to provide you with some kind of benefit in the course of your employment.
- Where we need to comply with a legal or regulatory obligation.

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).

We have set out in the Annex to this Privacy Policy, a description of all the ways we intend to use any personal data, and the legal bases we intend to rely on in order to do so. We have also identified what our legitimate interests are where appropriate. If you have any questions about how we may use your information, please contact us.

### **Automated decision making – MenziesConnect Portal**

Your employer may engage the use of our MenziesConnect portal to deliver your employee benefits. Our portal performs automated processing of your personal data to establish your eligibility for particular benefits. This decision-making is based on assessment of the personal data we hold about you against certain eligibility criteria. These eligibility criteria are defined and configured in the system by us, as per the benefit structure agreed with your employer.

UK data protection law places specific restrictions on the use of solely automated decision-making and limits the lawful bases on which the data controller can rely for processing personal data in this way. The lawful basis that we have defined in the Annex to this Privacy Policy takes into account the automated processing performed by the MenziesConnect Portal.

UK data protection law provides you with a specific right to opt out of automated processing, if it produces a legal or similarly significant effect on you (for example, if our technology has incorrectly determined you to be ineligible for a particular benefit). Please refer to the section ‘what are your rights’ on page 8 for further details on how to exercise your rights as a data subject.



## Who might we share your information with

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Your personal information may be shared at times within the 'Menzies Group' and this may be for example, to provide you with the varying products and services that we offer.

Your data from time to time may also be shared amongst third parties. We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions. We will ensure that your information is not subsequently shared further by these third parties without our agreement. We shall not share your personal data with any third parties for marketing purposes without your express consent.

We shall however, share your personal data with third parties, for the following reasons:

- To meet any agreed contractual arrangements we have with you, or your employer on your behalf, we may share your information with other service providers that we use to perform that contractual service. Examples of service providers include hosting services, suppliers and sub-contractors. We may also need to share your personal data with third party software or IT support providers for the purpose of system administration, data security, data storage, back up, disaster recovery and IT support.
- We may share your personal data with third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this Privacy Policy.
- We may share your personal data with carefully selected third parties to help us deliver and improve our services to you. We collaborate with specialised companies to enhance your experience and the quality of our services. We also utilise various software solutions and technologies to streamline our operations and improve service delivery. Your data may be processed by these providers to facilitate features.
- We reserve the right to disclose or share your personal data in order to comply with any legal or regulatory requirements, enforce our terms and conditions (or any agreement we enter into with you), or to protect the rights, property, or safety of our business and other website users. We may also share your personal data with our professional advisers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services.

### International transfers

Where possible we aim to ensure that any third party with whom we share personal data is based within the United Kingdom or the EEA. In some instances, as part of our agreed contractual relationship with you, or your employer on your behalf, we may undertake an international transfer of information to a third party outside of the EEA. When doing so, we implement appropriate safeguards to ensure the protection of your information.

## How long will we keep your information for

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We will only retain your personal information for as long as is necessary in order to discharge our statutory and legal obligations. This will vary depending on the particular circumstances and information we have collected.

Due to the long-term nature of pension and investment products, and the need to protect our contractual and legitimate interests, we retain most client records for extended periods. Specific retention requirements apply to different types of information:

Core financial records – we retain records relating to pension and investment advice indefinitely to:

- Meet ongoing regulatory obligations
- Maintain complete client history
- Support future advice needs

We keep retention periods under regular review and hold an internally published 'Record Retention' policy. A copy of our Record Retention Policy can be provided on request.

## How do we protect your information

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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 (for example anti-virus solutions and electronic monitoring applications, policies, procedures, employee vetting and training). In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know.

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.

Please note that the transmission of information via the internet is not completely secure. Although we shall do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we shall use effective safeguarding procedures and security features to try to prevent any unauthorised access to your personal data.

## What are your rights

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You have the right to access your information and to ask us to correct any mistakes and delete and restrict the use of your information. You also have the right to object to us using your information, to ask us to transfer information you have provided, and to withdraw permission you have given us to use your information and to ask us not to use automated decision-making which will affect you. For more information, see below.

You have the following rights (certain exceptions apply).

- Right of access: the right to make a written request for details of your personal information and a copy of that personal information
- Right to rectification: the right to have inaccurate information about you corrected or removed
- Right to erasure ('right to be forgotten'): the right to have certain personal information about you erased
- Right to restriction of processing: the right to request that your personal information is only used for restricted purposes
- Right to object: the right to object to processing of your personal information in cases where our processing is based on the performance of a task carried out in the public interest or we have let you know the processing is necessary for our or a third party's legitimate interests. You can object to our use of your information for profiling purposes where it is in relation to direct marketing
- Right to data portability: the right to ask for the personal information you have made available to us to be transferred to you or a third party in machine-readable formats
- Right to withdraw consent: the right to withdraw any consent you have previously given us to handle your personal information. If you withdraw your consent, this will not affect the lawfulness of MWM's use of your personal information prior to the withdrawal of your consent and we will let you know if we will no longer be able to provide you your chosen product or service
- Right in relation to automated decisions: you have the right not to be subject to a decision based solely on automated processing which produces legal effects concerning you or similarly significantly affects you, unless it is necessary for entering into a contract with you, it is authorised by law or you have given your explicit consent. We will let you know when such decisions are made, the lawful grounds we rely on and the rights you have.

Please note: other than your right to object to the use of your data for direct marketing (and profiling to the extent used for the purposes of direct marketing), your rights are not absolute: they do not always apply in all cases, and we will let you know in our correspondence with you how we will be able to comply with your request.



If you make a request, we will ask you to confirm your identity if we need to, and to provide information that helps us to understand your request better. If we do not meet your request, we will explain why.

In order to exercise your rights please contact our Compliance Officer at [advice@menzieswm.co.uk](mailto:advice@menzieswm.co.uk).

## Marketing

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We may use your personal information to send you marketing by post, by phone, through social media, by email and via our client portal. We can only use your personal information to send you marketing material if we have your permission or a legitimate interest as described above.

If you do not wish to receive emails from us, you can click on the 'unsubscribe' link that appears in all emails we send. Otherwise, you can contact us at [advice@menzieswm.co.uk](mailto:advice@menzieswm.co.uk) to update your contact preferences.

You have the right to object to direct marketing and profiling (the automated processing of your information to help us evaluate certain things about you, for example, your personal preferences and your interests) relating to direct marketing. Please see the section about your rights for more details.

Our website contains links to other websites. This privacy policy only applies to our website so when you link to other websites you should read their own privacy policies.

## Data protection contacts

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If you have any questions, comments, complaints or suggestions in relation to this notice, or any other concerns about the way in which we process information about you, please contact our Compliance Officer at [advice@menzieswm.co.uk](mailto:advice@menzieswm.co.uk).

You also have a right to make a complaint with the supervisory authority for data protection. In the UK this is:

Information Commissioner's Office  
Wycliffe House, Water Lane,  
Wilmslow, Cheshire,  
SK9 5AF

Telephone: +44 (0)303 123 1113

## Changes to our privacy notice

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We keep our privacy policy under regular review and the date of last review and update can be found on the front page of this document. Historic versions can be obtained by contacting us.

Any updates to our privacy notice will be placed on our website: [Menzies Wealth Management](#)

## How to contact us

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Please contact us if you have any questions about our privacy policy or information we hold about you:

By email at: [advice@menzieswm.co.uk](mailto:advice@menzieswm.co.uk)

Or write to us at: The Compliance Officer  
Menzies Wealth Management  
4<sup>th</sup> Floor  
95 Gresham Street  
London  
EC2V 7AB

Or telephone us: +44 (0)20 7465 1980

## Annex – processing activities

### Lawful basis for processing your information

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new client or to register you on a scheme we have set up for your employer.	a) Identity b) Contact	a) Performance of a contract with you. b) Necessary for our legitimate interests (to fulfil the terms of a contract with your employer they have entered on your behalf).
To manage our relationship with you which will include:  a) Manage payments, fees and charges b) Collect and recover money owed to us c) Notifying you about changes to our terms or privacy policy	a) Identity b) Contact c) Financial d) Transactional e) Recordings	a) Performance of a contract with you. b) Necessary to comply with a legal obligation. c) Necessary for our legitimate interests (to recover debts due to us/keep our records updated).
To administer and protect our business, including our website (troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data).	a) Identity b) Contact c) Technical	a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise). b) Necessary to comply with a legal obligation.
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	a) Identity b) Contact c) Profile d) Usage e) Marketing and Communications f) Technical	Necessary for our legitimate interests (to study how clients use our products/services, to develop them, to grow our business and to inform our marketing strategy).
To use data analytics to improve our website, products/services, marketing, client relationships and experiences.	a) Technical b) Usage	Necessary for our legitimate interests (to define types of clients for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about services that may be of interest to you.	a) Identity b) Contact c) Usage d) Technical e) Profile	Necessary for our legitimate interests (to develop our products/services and grow our business)

## MenziesConnect Portal

### Lawful basis for processing your personal information

Personal data type	Use	Source
Personal data you provide when setting up your account on the portal, which may include your email address and date of birth.	To identify you and to link your account to your employee record in the portal.	You
Personal data you provide when you access and use the portal. This includes information you provide when using the portal to select your employee benefits, such as details of your dependants (e.g. your partner or children).	To allow us to correctly process your employee benefits.	You
Personal data you provide when you contact us (including by email or telephone) about the portal. For example, when you open a support ticket.	To be able to communicate with you and assist you with your request.	You
Details of your use of the portal. For example, the pages you visit and the time you spend viewing a page.	To help us to improve the portal and fix problems.	You
Technical information about your computer or mobile device including details such as your operating system and web browser. This is statistical data and does not identify your individual device.	To help us to improve the portal and fix problems.	You
Information used to identify how you are connecting to the portal, such as your IP address.	For security reasons, so that we can link any actions made by your account in the portal with your internet connection (for example, to allow us to identify suspicious behaviour).	You
Your personal details such as your name, address and date of birth.	To uniquely identify you in the portal.	Your employment records
Your email address	To communicate with you about the portal. For example, to let you know when it's time to select your employee benefits.	Your employment records
Details about your employment, such as your job title, dates of employment and salary.	To determine your eligibility for employee benefits and to display information to you in the portal.	Your employment records
Details relating to your employee benefits, such as your holiday entitlement or pension contributions.	To present you with your benefit options and your past selections, as well as to generate your Total Reward Statement.	Your employment records