WILCOCKS & WILCOCKS

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DATA PROTECTION & PRIVACY NOTICE

SEPTEMBER 2026

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> Your privacy matters to us. This notice is provided under applicable UK data protection law, including the UK GDPR and Data Protection Act 2018. It explains what personal information we collect, why we use it, who we may share it with, how long we keep it and the rights you have. We aim to use your information only where it is relevant and necessary to provide the services you have asked us to deliver, meet our legal and regulatory obligations and operate our business responsibly.

WHO WE ARE

Wilcocks & Associates Limited (company number 06805421), trading as Wilcocks & Wilcocks, Martin Wilcocks and Bulletproof Retirement, is responsible for the personal information processed for the purposes described in this notice. We are authorised and regulated by the Financial Conduct Authority, firm reference 501064.

Where another group entity or professional firm is responsible for a particular service, we will make that clear and explain where a separate data controller is involved.

INFORMATION WE COLLECT

Depending on the work we undertake, we may collect identity and contact details; family and household information; employment, business and professional details; income, expenditure, assets and liabilities; bank, pension, investment and insurance information; tax and estate-planning information; source-of-wealth and source-of-funds information; communications, meeting notes and call recordings; identity-verification and anti-money-laundering information; and other information relevant to the advice or service you have asked us to provide.

WHERE INFORMATION COMES FROM

Most information comes directly from you. We may also receive information from a spouse, partner, family member or authorised representative; your employer or pension scheme; product providers, platforms, custodians and banks; professional advisers; public registers and databases; and identity-verification, anti-money-laundering or fraud-prevention services.

WHY WE USE YOUR INFORMATION

We use personal information to understand your circumstances and objectives; provide financial, investment, pension, retirement and estate-planning services; assess suitability and risk; arrange and administer products and investments; maintain records of our advice and your instructions; communicate with you; prevent fraud and financial crime; manage complaints and legal claims; meet regulatory, tax and legal requirements; and operate, secure and improve our business and systems.

OUR LAWFUL BASES

The lawful basis depends on the purpose. We may process your information because it is necessary to take steps at your request before entering into a contract or to perform our contract with you; to comply with legal and regulatory obligations; for our legitimate interests in running, securing and improving our professional business, provided those interests do not override your rights; or because you have given consent where consent is required. We will not rely on consent where another lawful basis is more appropriate.

SPECIAL CATEGORY INFORMATION

Financial planning can occasionally require information classed as special category data, for example health information relevant to protection, vulnerability, capacity or a particular planning decision. We only process this where it is genuinely necessary and where an appropriate condition under UK data protection law applies. Where explicit consent is required, we will ask for it clearly.

WHO WE SHARE YOUR INFORMATION WITH

We do not sell your personal information. We only share it where it is relevant and necessary for the service being provided, to meet a legal or regulatory obligation, or to protect our legitimate business interests. Depending on the work we undertake, we may share information with the following categories:

- investment platforms, custodians, and banks
- financial, pension and investment providers
- compliance consultants and professional advisers
- regulatory, tax, legal and dispute-resolution bodies
- accountants, solicitors, trust and estate-planning specialists
- IT, software, CRM, secure communications and data-storage providers
- identity-verification, anti-money-laundering and fraud-prevention services
- professional service providers to deliver or administer services we have agreed with you

We only share information with a financial provider or professional adviser where that organisation is relevant to your position. Details of specific organisations with whom your information has been shared are available on request.

INTERNATIONAL TRANSFERS

Some technology and professional service providers may store or process information outside the UK. Where an international transfer takes place, we use a lawful transfer mechanism and appropriate safeguards as required by UK data protection law. These may include UK adequacy regulations or approved contractual safeguards. Further information about the safeguards relevant to a particular transfer is available on request.

KEEPING INFORMATION ACCURATE

We rely on accurate and current information to advise you properly. Please tell us if your contact details, financial circumstances or other relevant information changes. We may also ask you to confirm or update information as part of our ongoing review process.

AUTOMATED DECISION-MAKING

We do not ordinarily make decisions about you based solely on automated processing that produce legal or similarly significant effects. Technology may assist with administration, analysis, identity checks, risk profiling or financial modelling, but professional judgement remains part of our advice process. If we ever introduce solely automated decision-making of this kind, we will explain how it works and the rights available to you.

DATA MINIMISATION

We aim to collect and use only the information that is reasonably necessary for the work we are carrying out. Access is restricted to people who need it for a legitimate business purpose, and we periodically review the information we hold.

HOW LONG WE KEEP INFORMATION

We keep personal information only for as long as there is a genuine business, legal or regulatory reason to do so. In practice, this means we normally retain client records for the duration of our relationship and for the period required afterwards by the FCA, other regulators, tax law, limitation periods, professional indemnity requirements and our need to establish or defend legal claims.

Certain records relating to pension transfer or other regulated advice may need to be retained indefinitely where regulatory rules require it. Where no fixed retention period applies, we use our retention schedule and review the purpose for which the information is held. We do not keep personal data indefinitely simply in case it may become useful.

SECURITY

We use appropriate technical and organisational measures to protect personal information against unauthorised access, loss, misuse, alteration or disclosure. These include access controls, secure systems and communications, backups, staff confidentiality requirements, supplier due diligence and ongoing review of our information-security arrangements. No system can eliminate every risk, but security is treated as an ongoing responsibility.

REQUESTS & ACCESS

We normally respond to valid data-rights requests within one month. We may need to verify your identity before releasing information. Rights are not absolute: for example, we may need to retain information to comply with FCA rules, anti-money-laundering law or to establish, exercise or defend legal claims. We will explain if a particular right does not apply in full.

YOUR RIGHTS

Depending on the circumstances and the lawful basis we rely on, you may have the right to:

- ask for access to the personal information we hold about you
- ask us to correct inaccurate or incomplete information
- ask us to erase information where there is no lawful reason for us to continue holding it
- ask us to restrict the way we use information in certain circumstances
- receive certain information in a portable format, where the right to data portability applies
- object to certain processing based on legitimate interests
- withdraw consent at any time where we rely on consent
- object at any time to the use of your personal information for direct marketing

YOUR RIGHT TO SAY NO

You can ask us to stop using your information for direct marketing at any time. You can also ask us to stop using it where we rely on our legitimate business interests. We will stop unless there is a strong legal or regulatory reason why we need to continue using the information, and if that applies we will explain why.

MARKETING & COMMUNICATIONS

We may occasionally contact you about services, information or events that we reasonably believe may be relevant to you. We only send direct marketing where permitted by law. For email, text and similar electronic communications this will ordinarily be based on your consent or, where available, the existing-customer soft opt-in under the Privacy and Electronic Communications Regulations.

You can change your marketing preferences or opt out at any time. Every electronic marketing message will provide a straightforward way to unsubscribe. Opting out of marketing does not affect service communications we need to send about work we are carrying out for you.

COMPLAINTS & THE ICO

If you have a concern about the way we use your information, please contact us first and we will try to resolve it. You also have the right to complain to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection.

Website: ico.org.uk
Telephone: 0303 123 1113

CHANGES TO THIS NOTICE

We review this notice periodically and may update it to reflect changes in our services, systems, suppliers, regulation or data-protection law. Where a change materially affects how we use your information, we will bring it to your attention before the new use begins where required.

CONTACT US

For privacy questions, requests to exercise your rights or to change your marketing preferences, please contact us:

Wilcocks & Associates Limited
5th Floor, Horton House
Exchange Flags
Liverpool L2 3PF

Email: info@wilcocksandwilcocks.co.uk
Telephone: 0345 200 4041
Website: wilcocksandwilcocks.co.uk

We do not sell your personal information. We only use or share it where it is needed to provide the services you have asked us for, meet our legal and regulatory responsibilities, or run our business properly and securely.

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