PRIVACY NOTICE

Dartington Wealth Management Limited

Last updated: November 2026

1. Introduction

Dartington Wealth Management Limited ("Dartington Wealth Management", "we", "us" or "our") is committed to protecting your personal information and respecting your privacy.

As a financial services business authorised and regulated by the Financial Conduct Authority (FCA), we recognise the importance of keeping your personal and financial information secure and handling it responsibly.

This Privacy Notice explains how we collect, use, store, share and protect your personal information when you use our services, visit our website or communicate with us.

We process personal information in accordance with applicable UK data protection legislation, including the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018 and amendments introduced by the Data (Use and Access) Act 2025.

2. Who We Are

Dartington Wealth Management Limited is the data controller responsible for determining how and why your personal information is processed in connection with the financial services we provide.

Our contact details are:

Dartington Wealth Management Limited

4 Clifton Court
Cambridge
CB1 7BN

Telephone: 01223 211 122
Email: enquiries@dartingtonwealth.co.uk
Website: dartingtonwealth.co.uk

FCA registration number: 717593

For enquiries relating to the use of your personal information or to exercise your data protection rights, please contact:

Data Protection Contact: Andrew Coury

3. Information We Collect

In order to provide financial advice and related services, we may collect and process the following categories of personal information.

Personal identification information

This may include:

- Your name, address and contact details.
- Your date of birth.
- Your marital or civil partnership status.
- Your National Insurance number and other relevant identification information.
- Identification documents and information used to verify your identity.

Financial information

This may include:

- Your income and expenditure.
- Your savings, investments and pensions.
- Your assets and liabilities.
- Your employment and retirement circumstances.
- Your financial objectives and investment preferences.
- Your attitude to investment risk and capacity for loss.
- Information about existing financial products and arrangements.
- Other information necessary to assess your financial circumstances and provide appropriate advice.

Information about your personal circumstances

Where relevant to the services we provide, we may collect information relating to your family circumstances, dependants, beneficiaries and estate-planning arrangements.

Sensitive personal information

In certain circumstances, we may need to collect information about your health, disability or other personal circumstances where this is relevant to the financial advice or support we provide.

For example, you may tell us about a medical condition that affects your financial planning needs or means that you require additional assistance when dealing with us.

We recognise that health information and certain other types of personal information require additional protection under data protection legislation.

We will only collect and use such information where necessary and where we have an appropriate lawful basis and, where required, an additional legal condition for processing special category information.

Website and communication information

When you visit our website or communicate with us, we may collect technical and communication information, including:

- Information submitted through website contact forms.
- Correspondence by email or other communication channels.
- Information about your use of our website.
- Technical information collected through cookies and similar technologies, where applicable.

4. How We Collect Your Information

We primarily collect personal information directly from you when you:

- Contact us to enquire about our services.
- Arrange an appointment with an adviser.
- Complete financial planning questionnaires or fact-finding documents.
- Enter into a client agreement.
- Provide information during meetings, telephone conversations or correspondence.
- Request ongoing financial advice or reviews.
- Use our website or contact forms.

We may also receive relevant personal information from third parties, including:

- Investment and pension providers.
- Insurance companies.
- Platform providers.
- Other professional advisers.

- Financial institutions.
- Publicly available sources.
- Other organisations where you have authorised or requested information to be shared.

We will only obtain and process information from third parties where we have a lawful basis to do so.

5. How We Use Your Personal Information

We use personal information for legitimate business and regulatory purposes associated with providing financial services.

These purposes may include:

Providing financial advice

To understand your financial circumstances, objectives and requirements so that we can provide appropriate financial advice and recommendations.

Managing our relationship with you

To maintain client records, communicate with you, arrange meetings and provide ongoing services.

Administering financial arrangements

To assist with applications, transactions and communications involving investment, pension and other financial product providers.

Meeting legal and regulatory obligations

To comply with applicable laws and FCA regulatory requirements, including record-keeping, identity verification, financial crime prevention and appropriate client assessment.

Maintaining security and preventing fraud

To protect our business, customers and systems against fraud, unlawful activity and unauthorised access.

Improving our services

To monitor service quality, respond to feedback and improve the services we provide.

Supporting customers requiring additional assistance

To identify and respond appropriately to customers who may require additional support because of their personal circumstances.

Marketing communications

Where permitted by law, to communicate information about our services that may be of interest to you.

You can ask us to stop sending direct marketing communications at any time.

6. Our Lawful Basis for Processing Personal Information

UK data protection legislation requires us to have a lawful basis for processing personal information.

Depending on the circumstances, we may rely on the following legal grounds:

Contractual necessity

Where processing is necessary to provide financial advice or services under a contract with you, or to take steps at your request before entering into a contract.

Legal obligation

Where processing is necessary to comply with legal or regulatory obligations applicable to our business.

Legitimate interests

Where processing is necessary for our legitimate business interests or those of a third party, provided those interests are not overridden by your rights and freedoms.

These interests may include maintaining client relationships, protecting our business against fraud, maintaining appropriate records and improving our services.

Consent

Where consent is required for a particular processing activity, we will ask for it.

You may withdraw your consent at any time. Withdrawal will not affect processing already carried out lawfully.

We do not rely on consent for every aspect of our financial advice services. Other lawful bases may apply where processing is necessary for contractual, legal or regulatory purposes.

7. Supporting Customers in Vulnerable Circumstances

We recognise that customers may experience circumstances that make them more susceptible to harm or mean that they require additional support when accessing financial services.

These circumstances may arise from health conditions, life events, financial difficulties, reduced financial resilience or difficulties understanding or managing financial matters.

In accordance with applicable FCA requirements and guidance, we aim to identify and respond appropriately to customers who may require additional assistance.

Where you tell us about circumstances that affect the way you wish to communicate or engage with us, we may record relevant information to help us provide appropriate support.

For example, this may include:

- Communication preferences.
- Accessibility requirements.
- Requests for additional explanation or assistance.
- Relevant information about a health condition or disability.
- Arrangements involving an authorised representative.

We will seek to collect only the information necessary to understand and respond to your needs.

Where this involves special category personal information, we will ensure that an appropriate legal basis and additional processing condition apply.

Access to this information will be restricted to individuals who have a legitimate business need to know.

You may contact us at any time if you require additional assistance or would like to discuss how we can make our services more accessible.

8. Sharing Your Personal Information

We may share relevant personal information with third parties where necessary to provide our services or comply with applicable legal and regulatory requirements.

Depending on the services provided, these may include:

- Pension and investment providers.
- Insurance companies.
- Investment platforms and custodians.

- Financial institutions.
- Technology and IT service providers.
- Professional advisers, including accountants and solicitors.
- Compliance consultants and professional service providers.
- Regulatory bodies, including the Financial Conduct Authority.
- Law enforcement agencies and other public authorities where disclosure is required or permitted by law.

Where third parties process personal information on our behalf, we take appropriate steps to ensure suitable contractual arrangements and data protection safeguards are in place.

We do not sell your personal information to third parties.

9. International Transfers of Personal Information

Where personal information is transferred outside the United Kingdom, we will ensure that appropriate safeguards are in place in accordance with applicable data protection legislation.

These may include transfers to countries covered by UK adequacy regulations or the use of approved contractual safeguards, where applicable.

Where required, we will provide information about the safeguards used and how you may obtain further details.

10. How Long We Keep Your Information

We retain personal information only for as long as necessary to fulfil the purposes for which it was collected, including meeting applicable legal, regulatory and professional obligations.

As an FCA-regulated financial services business, we are required to maintain certain records relating to the advice and services provided to clients.

Different categories of information may be subject to different retention requirements.

The period for which we retain information will depend on factors including:

- The nature of the information.
- The financial products or services involved.
- Applicable FCA requirements.
- Statutory record-keeping obligations.

- The need to establish, exercise or defend legal claims.
- Whether an ongoing client relationship exists.

Where information is no longer required, we will securely delete, destroy or anonymise it in accordance with our data retention procedures.

Further information about our retention arrangements is available on request.

11. How We Protect Your Information

We take the security of personal information seriously and maintain appropriate technical and organisational measures to protect it.

These measures are designed to reduce the risk of:

- Unauthorised access.
- Accidental loss.
- Unlawful disclosure.
- Alteration or misuse.
- Destruction of personal information.

Access to personal information is restricted to employees and authorised third parties who require it for legitimate business purposes.

Our staff are required to follow appropriate confidentiality and information security procedures.

We regularly review our information security arrangements.

12. Your Data Protection Rights

Under applicable data protection legislation, you have a number of rights concerning your personal information.

Depending on the circumstances, these include:

Right to be informed

You have the right to understand how and why we use your personal information.

Right of access

You may request a copy of the personal information we hold about you.

Right to rectification

You may request that inaccurate or incomplete personal information is corrected.

Right to erasure

In certain circumstances, you may request that personal information is deleted. This right is not absolute and may be restricted where we are required to retain information for legal or regulatory purposes.

Right to restrict processing

You may request that we restrict the use of your information in certain circumstances.

Right to data portability

Where applicable, you may request that information is provided in a structured, commonly used and machine-readable format.

Right to object

You may object to processing based on legitimate interests in certain circumstances. You also have the right to object to processing of your personal information for direct marketing purposes at any time.

Rights relating to automated decision-making

Where we make significant decisions about you using solely automated processing, applicable data protection legislation provides safeguards and rights, including rights relating to information about the decision, human intervention and challenging the decision.

Right to withdraw consent

Where we rely on your consent, you may withdraw it at any time.

To exercise your rights, please contact us using the details in Section 2.

We will respond in accordance with applicable statutory timescales and requirements.

13. Data Protection Complaints

We are committed to addressing concerns about how we collect, use or protect personal information. If you believe that we have not handled your personal information appropriately, you may raise a data protection complaint with us.

Data Protection Contact:

Dartington Wealth Management Limited

4 Clifton Court
Cambridge
CB1 7BN

Email: [Insert contact email address]

We will acknowledge your data protection complaint within 30 days of receiving it.

We will take appropriate steps to investigate your concerns without undue delay, keep you informed of progress and communicate the outcome as soon as reasonably practicable.

You also have the right to complain to the Information Commissioner's Office (ICO), the UK's data protection regulator.

Information Commissioner's Office

Website: www.ico.org.uk

Telephone: 0303 123 1113

We would welcome the opportunity to address your concerns directly before you approach the ICO, although you are not required to do so.

Complaints concerning the financial services we provide may be subject to a separate complaints procedure and applicable Financial Ombudsman Service rights.

14. Cookies and Website Information

Our website may use cookies and similar technologies to support its operation, improve functionality and understand how visitors use our website. Where cookies or similar technologies require consent, we will obtain that consent before using them.

You can manage your preferences through the cookie controls available on our website, where applicable.

For further information, please refer to our separate Cookie Policy.

15. Changes to This Privacy Notice

We may update this Privacy Notice from time to time to reflect changes in legislation, regulatory requirements or our business activities.

The latest version will be available on our website.

Where significant changes affect the way we process your personal information, we will take appropriate steps to bring those changes to your attention.

Last updated: November 2026