Privacy Policy

1. Who We Are

Churchill Wealth Management Limited is an independent financial advice firm authorised and regulated by the Financial Conduct Authority (FCA). We provide financial planning and investment advice to individuals, trustees and businesses.

Company number	08140091
Registered office	8 College Street, Gloucester, GL1 2NE
Principal address	33 Oakfield Road, Clifton, Bristol, BS8 2AT
Telephone	0117 923 7652
Email	enquiries@churchillwm.co.uk
Website	www.churchillwm.co.uk

We act as a data controller in respect of the personal information we process about you.

2. Information We Collect

To provide you with financial advice and related services, we collect and process:

- **Identity and contact details**: name, address, date of birth, email, phone number, National Insurance number and identity documents
- **Financial information**: income, assets, liabilities, investments, pensions, tax position and financial objectives
- **Special category data**: health or medical information where relevant to your financial planning or insurance needs
- **Anti-money laundering records**: identity verification documents, proof of address and source of funds information
- **Communications**: records of emails, letters, calls, meetings and correspondence
- **Meeting recordings and transcripts:** where we record a meeting with you, the audio or video and a written transcript of it
- **Website and technical data**: IP address, browser type and cookies (see Section 11)

3. How We Collect Your Information

We collect information directly from you in meetings, by telephone, email, through our website enquiry form or when you complete our fact-find and client documentation. We may also receive information from third parties such as investment platforms, pension providers, employers and publicly available sources where this is lawful and appropriate.

4. How We Use Your Information

We use your personal information to:

- Provide financial advice, investment management and related services
- Assess suitability and prepare suitability reports
- Arrange, administer and review financial products and investments on your behalf

- Keep accurate records of our meetings and advice, including through meeting recordings, transcripts and summaries
- Comply with FCA regulatory requirements, anti-money laundering legislation and other legal obligations
- Handle complaints and resolve disputes
- Protect against fraud and financial crime
- Contact you with service updates or relevant information (you may opt out of marketing at any time)

5. Our Lawful Basis for Processing

We process your personal information on the following lawful bases under UK GDPR:

- **Contract**: processing is necessary to provide the services you have engaged us for
- **Legal obligation**: we are required to process certain information to comply with FCA rules, anti-money laundering legislation, tax reporting and other regulatory requirements
- **Legitimate interests**: for business administration, fraud prevention, cybersecurity, record keeping, operational governance and the accurate recording of our meetings, where these interests are not overridden by your rights
- **Consent**: for certain marketing communications and, as explained below, for special category data such as health information. You may withdraw consent at any time without affecting earlier processing

Where we process special category data (such as health information), we do so with your explicit consent or, where it is not possible to obtain your consent, under the conditions in Schedule 1 to the Data Protection Act 2018 for safeguarding the economic well-being of certain individuals or for insurance purposes. You can withdraw your consent at any time.

6. Who We Share Your Information With

We share your personal information only where necessary. Recipients may include:

- Investment platforms and product providers (for example Transact, AJ Bell, Quilter, Royal London, Scottish Widows)
- Client portal, financial planning and productivity software providers (for example Intelliflo, Genovo, FE Analytics, and Microsoft for Microsoft 365, Microsoft Teams and Microsoft 365 Copilot)
- Artificial intelligence technology provided by Anthropic PBC, used for our internal compliance review tool (see Section 7)
- Compliance support providers (for example Bankhall, A&L Compliance Management Services Ltd)
- The Financial Conduct Authority, HMRC, the ICO and other regulatory or government bodies where required by law
- Professional advisers such as legal, audit and compliance professionals where necessary
- Identity verification and fraud prevention services

We do not sell your personal data. All third parties are required to handle your information securely and in accordance with applicable data protection law.

7. How We Use Artificial Intelligence

We use artificial intelligence (AI) to support some of our internal work. We use two tools:

- **Microsoft 365 Copilot,** which works inside our own secure Microsoft 365 environment. Our team uses it to help with drafting, research, summarising documents and, where we have told you, producing notes of meetings.
- **A compliance review tool** that we have built using technology provided by Anthropic PBC, which helps us check client files and documents against regulatory requirements.

If we introduce further AI-assisted tools or uses, they will operate under the same safeguards described in this section unless we tell you otherwise. AI never decides whether a recommendation is suitable for you, or makes any other decision about your finances. That always remains the professional judgement of your adviser or our Compliance Officer, applied after independent review. Where AI is used, the following safeguards always apply:

- **A qualified person always reviews the work.** AI-assisted output is checked and approved by a qualified member of our team before it is used. Any advice you receive always reflects the professional judgement of your adviser.
- **Your information is protected by contract.** Microsoft and Anthropic each act as our data processor under a formal data processing agreement and may only process information on our instructions.
- **Your information is not used to train AI.** Microsoft does not use our data to train its AI models, and Anthropic is contractually prohibited from using our data, including any personal information, to train its AI models.
- **Your information stays in our environment.** Microsoft 365 Copilot works only on information our staff are already permitted to see, inside our Microsoft 365 environment, where your data is processed and stored in the UK. We have switched off Copilot's web search, its memory features and its use of third-party AI model providers, so your information is not sent to internet search services or carried between sessions.
- **We limit what is shared.** Where we use the compliance review tool, identifying details such as names, addresses, employer, email addresses, phone numbers and official identification numbers are removed on our own systems before any information is sent to Anthropic. Our staff's use of AI is governed by a signed internal AI use policy with strict controls.

Recording and summarising meetings

We may record and transcribe meetings with you, including video meetings held through Microsoft Teams and telephone calls. We tell you at the start of a meeting if we are recording it. Copilot may be used to produce a summary and a list of actions, which your adviser reviews and corrects before it is placed on your file. Recordings and transcripts are stored securely in our Microsoft 365 environment in the UK, are accessible only to the people who need them, and are deleted at the end of a defined retention period. If you would prefer a meeting not to be recorded, tell your adviser and we will take notes manually.

8. International Transfers

Some of our service providers process information outside the UK. In particular, Anthropic PBC is based in the US, and some other software providers may process data internationally. Where personal information is transferred outside the UK, we ensure it receives an equivalent standard of protection through lawful transfer mechanisms, such as UK adequacy regulations, or Standard Contractual Clauses supplemented by the UK International Data Transfer Addendum approved by the Information Commissioner's Office.

9. How Long We Keep Your Information

As an FCA-regulated firm, we are required to retain certain records, including advice records, suitability reports and transaction records, for a minimum of six years following the end of our relationship with you. Some records may be retained for longer where required by law, regulation or for the resolution of complaints or legal claims. Meeting recordings and transcripts are kept for a defined retention period and then deleted. The approved note of a meeting is retained with your file for the period above. When information is no longer required, we securely delete or destroy it.

10. How We Protect Your Information

We maintain appropriate technical and organisational security measures to protect your personal information against unauthorised access, loss, misuse or disclosure. These include access controls, multi-factor authentication, encryption, sensitivity labelling of client records, secure document storage and staff awareness procedures. Where a personal data breach occurs, we take prompt action and notify the ICO and affected individuals where required by law.

11. Website and Cookies

Our website uses:

- **Session cookies** — temporary cookies that expire when you close your browser
- **Performance cookies (Google Analytics)** — to understand how visitors use the site. This data is anonymous and does not identify you personally
- **Security cookies** — used by our anti-spam service (CleanTalk) to protect the site

Our website may contain links to third party websites. We are not responsible for the privacy practices of those sites and recommend you review their privacy notices before providing any personal information.

12. Your Rights

Under UK GDPR, you have the following rights in relation to your personal information:

- **Access** — request a copy of the personal information we hold about you (free of charge, within one month)
- **Rectification** — ask us to correct inaccurate or incomplete information
- **Erasure** — request deletion of your data, subject to our legal and regulatory retention obligations
- **Restriction** — ask us to limit how we process your data in certain circumstances
- **Portability** — request your data in a structured, machine-readable format
- **Objection** — object to processing based on legitimate interests or for direct marketing purposes
- **Withdraw consent** — where we rely on consent, you may withdraw it at any time

To exercise any of these rights, please contact us using the details in Section 1. We may ask you to verify your identity before processing your request.

13. Complaints

If you have a concern about how we handle your personal information, you can complain to us by emailing mbarrett@churchillwm.co.uk, telephoning 0117 923 7652 or writing to us at our principal address. We will acknowledge your complaint within 30 days, keep you informed of progress and tell you the outcome without undue delay. You do not have to complain to us before contacting the ICO.

You also have the right to complain to the Information Commissioner's Office (ICO) at any time:

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

Helpline: 0303 123 1113

Website: www.ico.org.uk

14. Changes to This Policy

We may update this Privacy Policy from time to time to reflect changes in law, regulation or our business practices. The latest version will be available on our website and provided to you on request.