

## Privacy Notice

Our Privacy Notice explains how we use your personal data, describes the categories of personal data we process and for what purposes. We are committed to collecting and using such data fairly and in accordance with the requirements of the Data Protection Act 2018 and the Data (Use and Access) Act 2025. The Data (Use and Access) Act 2025 enhances your rights by giving you more control over how your data is accessed and used, especially in digital and automated contexts. It strengthens transparency and introduces stricter standards for how financial advisers like us handle your personal information.

We take your privacy seriously and you can find out more here about your privacy rights and how we gather, use and share your personal information.

## Summary

### Who We Are?

Watson Wood & Sillars Ltd trading as Watson Wood Financial Planning - 1<sup>st</sup> Floor, Lyle House, Fairways Business Park, Inverness IV2 6AA acts as a controller for the personal information you provide to us.

### Your Rights

You have the right to object to how we process your personal information. You also have the right to access, correct, sometimes delete and restrict the personal information we use. In addition, you have a right to complain to us and to the data protection regulator. Contact details are shown here.

- Allan Sillars: [allan@watsonwoodfp.co.uk](mailto:allan@watsonwoodfp.co.uk) or write to us at the address shown above
- Information Commissioner: [ico.org.uk/global/contact-us](https://ico.org.uk/global/contact-us)

Your privacy rights are detailed more fully on the following pages.

### How We Gather and Use Personal Information

We need to obtain information about you, so that we can provide the financial advice you require. This information is normally obtained directly from clients in a face-to-face meeting. It may also be obtained by telephone, post or other means. We hold such information as Data Controllers in accordance with the requirements of the Data Protection Act 2018 and the Data (Use and Access) Act 2025. We use this information to analyse your current and future financial needs so that we can ensure that any subsequent advice takes due account of, and is suitable to, your circumstances. We will not share your information with any other party except as indicated in this Privacy Statement or where required to do so by any statutory, governmental or regulatory body for legitimate purposes.

## **Sharing and Transferring Personal Information**

Where necessary to the provision of our service, we may share your personal information with third parties. The categories of third party are listed later in this notice. We will confirm the actual third parties with whom we might/will share your information when we have identified the product/service providers that we recommend you use. This will usually be done in our Suitability Report in which we detail our recommendations to you.

Until you have been informed of the actual third parties with whom we might share your information, and provided that you have not terminated our contract or otherwise objected to that sharing, we will only share in a way that does not enable the third party to identify you. Sometimes we transfer personal information to other countries outside the UK for these purposes, where suitable protection is in place.

## **Keeping Personal Information**

We keep your personal information securely for as long as we need to for the purpose of providing you with financial advice under the terms of our service/fee agreement (contract) or for as long as we are required to by relevant regulations.

## **Legal Basis for Collecting/Processing Information**

The legal basis on which most of the information that you provide will be collected and processed is to enable us to provide the financial advice that we have agreed you require. However, some types of information require your explicit consent. In particular, in relation to any adverse health history you might have. We will seek your consent if required. Where you have given us consent, you have the right to withdraw it at any time.

## **Complaints**

If you believe your rights under the Data (Use and Access) Act 2025 have been infringed, you have the right to complain to the Information Commissioner's Office (ICO).

# Full Privacy Notice

## Introduction

We take your privacy seriously and you can find out more here about your privacy rights and how we gather, use and share your personal information.

## Your Privacy Rights

You have the right to see what personal information we hold about you and you can ask us to correct inaccuracies, delete or restrict personal information or ask for some of your personal information to be provided to someone else. You have the right to object to how we use your personal information. If you need to contact us in relation to any of your rights or wish to make a complaint about how we have used your personal information directly to us or to the Information Commissioner's Office, you can use the contact details indicated on the first page of this notice.

- **Right to withdraw consent:** Where you have given us your consent to use personal information, you can withdraw your consent at any time.
- **Access to your personal information:** You can request access to a copy of your personal information. We will not normally charge for providing this information to you. Your data may be shared with regulated third-party service providers, such as investment platforms or product providers, strictly under legal obligations and safeguards established by the Data (Use and Access) Act 2025. We do not transfer your data outside the UK without implementing safeguards compliant with the Act.
- **Portability:** You can ask us to provide you or a third party with some of the personal information that we hold about you in a commonly used electronic form.
- **Rectification:** You can ask us to change or complete any inaccurate or incomplete personal information held about you.
- **Erasure:** You can ask us to delete your personal information where it is no longer necessary for us to use it, you have withdrawn consent, or where we have no lawful basis for keeping it. Note that we might be required by regulations to retain your information even if you want it to be deleted.
- **Right to object:** You can object to our processing of your personal information for marketing purposes.
- **Restriction:** You can ask us to restrict the personal information we use about you where you have asked for it to be erased or where you have objected to our use of it.
- **Right to object to automated decision-making:** We may use automated tools to assess your financial suitability or risk profile. These tools support, but do not replace, our professional judgement. Under the Data (Use and Access) Act 2025, you have the right to object to solely automated decisions and request human involvement.
- **Right to know who accesses your data:** We may use your personal data for internal compliance reviews, adviser performance monitoring, or regulatory audit purposes, as permitted by the Data (Use and Access) Act 2025. This use is subject to strict internal access controls.

## Legal Basis for Collecting/Processing Information

The legal basis on which most of the information that you provide will be collected and processed is to enable us to provide the financial advice that we have agreed you require. However, some types of information require your explicit consent. In particular, where we identify that it is relevant to obtain details from you in relation to any adverse health history you might have, we will seek your explicit consent. Where you have given us consent, you have the right to withdraw it at any time.

## **What Kinds of Personal Information We Use?**

We use information relating to your personal situation and financial position.

## **How We Gather Your Personal Information**

We obtain personal information:

- Directly from you, usually in a face-to-face meeting but potentially also by telephone or other means.
- From other organisations such as investment/pension/insurance providers, where you have provided authority for them to share information relating to your existing plans
- From your professional advisers, where you have provided authority for them to share information.
- We may also obtain some personal information from recording calls or meetings or by making contemporaneous notes of calls or meetings.

## **How We Use Your Personal Information**

We hold your personal information as Data Controllers in accordance with the requirements of the Data Protection Act 2018, and the Data (Use and Access) Act 2025.

We use this information to analyse your current and future financial needs so that we can ensure that any subsequent advice takes due account of, and is suitable to, your circumstances.

We will not share your information with any other party except as indicated in this Privacy Statement or where required to do so by any statutory, governmental or regulatory body for legitimate purposes.

## **Sharing and Transferring Personal Information**

Where necessary to the provision of our service, we may share your personal information with third parties. The categories of third parties are listed below.

- Insurance Providers
- Pension Providers
- Annuity Providers
- Investment Providers
- Investment Platforms
- Providers of pension transfer comparison reports
- Compliance Advisers
- Legal Advisers
- Back Office Systems Providers
- Third Party Software Providers (Intelligent Office)

We will confirm the actual third parties with whom we will share your information when we have identified the product/service providers that we recommend you use. This will usually be done in our Suitability Report in which we will detail our recommendations to you.

Until you have been informed of the actual third parties with whom we will share your information, and provided that you have not terminated our contract or otherwise objected to that sharing, we will only share in a way that does not enable the third party to identify you.

Where necessary to implement the service that you require, your personal information might be transferred to other countries outside the UK, but only to jurisdictions where suitable protection is in place.

## **Use of Artificial Intelligence (AI)**

We may use Artificial Intelligence (AI) or machine learning technologies in certain aspects of our services or operations. Where this is the case, we do so in accordance with data protection legislation, and only where appropriate safeguards are in place.

### **1. AI Assisted Document or Communication Drafting**

We may use AI tools to assist in the drafting of communications or documentation (such as suitability reports or internal compliance templates).

These tools may analyse structured information to improve clarity, accuracy, or efficiency. No automated decisions are made, and all outputs are reviewed and approved by a human adviser or compliance officer before being issued.

### **2. AI Driven Business Analysis or Insights**

We may use AI-powered analytics to identify business trends, client preferences, or improve internal operations. These tools process anonymised or aggregated data to ensure individuals are not identified. All outcomes are interpreted and actioned by human decision makers.

### **3. Client Risk Profiling / Suitability Tools**

Where AI or algorithmic tools support the assessment of investment risk profiles or financial suitability, they are used as part of a wider, human led advice process.

We do not use fully automated systems to make decisions that would have a significant effect on you without human involvement.

### **4. AI in Fraud Detection or Security**

AI systems may be used to monitor systems or transactions for suspicious patterns that could indicate fraud or cybersecurity threats. These systems operate in real-time and may trigger alerts for manual investigation.

### **5. Automated Decision-Making**

We do not carry out any fully automated decision making that produces legal or similarly significant effects without human involvement. If this position were to change, you would be notified and provided with your rights under data protection law.

## **Keeping Personal Information**

We keep your personal information securely for as long as we need to for the purpose of providing you with financial advice under the terms of our service/fee agreement (contract) or for as long as we are required to by relevant regulations.