

# True Potential LLP

## Privacy & Cookie Policy

# Privacy Policy

## About us

The True Potential Group takes the privacy and security of your personal information very seriously. In this notice, "we", "us" or "our" means the True Potential entity that processes your personal information and interacts with you. These entities are listed below. We are committed to protecting and respecting your privacy.

Under the General Data Protection Regulation (Regulation (EU) 2016/679) (the "GDPR"), we are required to give you certain information about the way your personal information is used.

This notice (together with our Statutory disclosures and any other documents referred to in it) ("Privacy Notice") sets out the basis on which any personal information we collect from you, or that you provide to us, will be processed by us.

The relevant entities referred to above are:

- True Potential Investments LLP ("TPI") (a company registered in England and Wales under company number OC356027, whose registered office is at Newburn House, Newburn Riverside, Newcastle Upon Tyne, NE15 8NX);
- True Potential Wealth Management LLP ("TPWM") (a company registered in England and Wales under company number OC356611, whose registered office is at Newburn House, Newburn Riverside, Newcastle Upon Tyne, NE15 8NX);
- True Potential Adviser Services LLP ("TPAS") (a company registered in England and Wales under company number OC326607, whose registered office is at Newburn House, Newburn Riverside, Newcastle Upon Tyne, NE15 8NX);
- True Potential Trustee Company Limited (a company registered in England and Wales under company number 08388342, whose registered office is at Newburn House, Newburn Riverside, Newcastle Upon Tyne, NE15 8NX).

The above stated entities are the data controllers/processors of the personal information we hold about you.

## Information we may collect from you

We may collect and use the following personal information about you:

**Information you give us.** You may give us information about you by filling in forms on our sites or by corresponding with us by phone, email, in writing or otherwise. This includes but is not limited to information you provide when you open an investment account, request quotations, register for email alerts, request literature, sign-up for newsletters or enter a competition, promotion or survey.

The information you give us may include your name, address, email address and other contact information, financial information, (including existing investments, funds held with

banks and other financial institutions), information regarding financial debts, (mortgage, loans, credit cards) and debit card information.

You will give us personal information:

- when you apply for our products and services
- when you talk to us on the phone or by other means
- when you use our websites, mobile device apps, web chat or other services
- in emails and letters
- in financial reviews and interviews
- in customer surveys
- if you take part in our competitions or promotions.

**Information we collect about you.** When you visit our sites or use our services, we may automatically collect the following information. This includes the amount, frequency, type, location, origin and recipients.

- technical information, including information obtained cookies, the Internet Protocol (IP) address used to connect your computer to the internet, your login information, your geographic location, browser type and version, browser plug-in types and versions, operating system and platform;

For analytics purposes we may also obtain the following information. Please note that this will not contain information that could be used to personally identify an individual:

- information about your visit, including the source of your visit, the full click path, mouse movement, through our sites (including date and time); services you viewed, searches made on our sites, page response times, download errors, length of visits to certain pages, page interaction information (such as page scrolling, mouse clicks, mouse movements and keyed text), and methods used to browse away from the page and any phone number used to call our Helpdesk. This information may be collected using a website recording service.

**Information we collect at receipt and opening of emails.** From time to time when you open an email sent by us we may automatically collect the following information:

- technical information, including; your geographic location, browser type and version, device type and operating system and platform
- information about how you have accessed/used the e-mail, including the full click path from within and on to our sites (including date and time), whether the email was; unsubscribed from, opened, deleted, forwarded or printed, how long the email was open.

**Information we receive from other sources.** We may receive personal information about you if you use other websites operated by other companies within the True Potential group or the other services they provide.

We may also receive personal information about you from third party service providers such as credit reference agencies, payment service providers, crime prevention agencies, government bodies or analytics providers. This information could be used as part of the service we provide to you, or as part of our regulatory or legal obligations. We may combine this information with information you give to us and information we collect about you. We may use this information and the combined information for the purposes set out in this Privacy Notice (depending on the types of information we receive).

We may receive personal information from third parties that we work with including:

- Companies that introduce you to us
- Financial advisers
- Insurers
- Comparison websites
- Fraud prevention agencies
- Credit reference agencies
- Payroll service providers (In relation to Auto-Enrolment Pension products)
- Public information sources such as Companies House
- Agents working on our behalf
- Market researchers
- Government and law enforcement agencies.

## Using your information

Your personal information will be used for the purposes of providing financial advice and the administration and management of investments. Under data protection law, we can only use your personal information if we have a proper reason for doing so. A proper reason could be when we have:

- your consent
- it is necessary to enter into or perform a contract
- it is necessary to comply with a legal obligation
- when it is in our legitimate interests.

Where we rely on our legitimate interests we mean our:

- pursuit of our commercial activities and objectives, or those of a third party
- compliance with applicable legal and regulatory obligations and any codes of conduct
- improvement and development of our business operations and service offering, or those of a third party
- protection of our business, shareholders, employees and customers, or those of a third party.

We have set out our reasons for using your personal information in the table below under the heading **Legal Basis**. Where we rely on our legitimate interests, we have set out those interests in the table below.

Purpose	Legal basis
To provide you with any services and/or information you request from us (which includes carrying out any obligations arising from any contracts entered into between you and us).	To fulfil our contractual obligations.
To comply with any instructions, you give to us.	To fulfil our contractual obligations.
To notify you about changes to our service.	It is in our legitimate interests to use your personal information for this purpose.
To provide you with information by post, email, telephone or otherwise about products and services of a similar nature to those you have previously purchased or expressed an interest in which are offered by our Group and which we think may be of interest to you.	We rely on your consent to send you these communications.
To administer our sites and for internal operations, including troubleshooting, data analysis, load management, testing, research, statistical and survey purposes.	It is in our legitimate interests to use your personal information for this purpose.
To improve our sites to ensure that content is presented in the most effective manner for you and for your computer.	It is in our legitimate interests to use your personal information for this purpose.
To measure or understand the effectiveness of content we serve to you and others, and to deliver relevant content to you.	It is in our legitimate interests to use your personal information for this purpose.
For the purposes of providing services such as 'most popular' information on our site.	It is in our legitimate interests to use your personal information for this purpose.
To deliver targeted advertisements to you and others as you browse the internet, where consent has been given to do so.	We rely on your consent to carry out this advertising.

To obtain your feedback on a product, service or our sites via a third party appointed by us.	It is in our legitimate interests to use your personal information for this purpose.
As part of our efforts to keep our sites safe and secure and to prevent and detect money laundering, financial crime and other crime.	Comply with our legal obligations
For customer modelling, statistical and trend analysis, with the aim of developing and improving our products and services.	It is in our legitimate interests to use your personal information for this purpose.
To prevent and detect fraud, including to share your personal information with Fraud Prevention Agencies for this purpose.	It is in our legitimate interests to use your personal information for this purpose.  This may in some circumstances be necessary for us to comply with our legal obligations.

## Who we share your personal information with

We may share the personal information we hold about you across the True Potential Group to enable us to better understand your needs and run your accounts in the efficient way that you expect.

For the purposes set out above, we may share your information with selected third parties including:

- our partners, suppliers and sub-contractors such as:
  - Companies within the True Potential Group who offer advice, platform or technology services
  - SEI Group who provide investment trading services
  - YesPay who provide payment/transaction services
- governmental or judicial bodies or agencies such as:
  - HM Revenue & Customs
  - Financial Conduct Authority
  - UK Financial Services Compensation Scheme
  - other regulatory bodies and authorities
- fraud and anti-money laundering prevention agencies, other companies and organisations to prevent or detect financial and other crime such as:
  - National Crime Agency (NCA)
  - W2 Global Data who offer Anti-Money Laundering and Fraud Screening services
- credit reference agencies for the purpose of client banking identification such as:
  - Experian

- advertisers and advertising networks that require the data to select and serve adverts about our services to you and others. It will only be passed to third party advertisers in order to provide services on behalf of the True Potential Group such as:
  - Union Room
  - Media Works
  - Campaign Monitor
- data, service and software providers that assist us in the improvement and optimisation of our sites
- any party linked with you or your business's product or service
- companies we have a joint venture or agreement to co-operate with
- organisations that introduce you to us
- companies you ask us to share your data with.

We may also share your personal information with third parties if the make-up of the True Potential Group changes in the future:

- if we sell or buy any business or assets we will pass your personal information to the prospective seller or buyer of such business or assets;
- if we or substantially all of our assets are bought by a third party personal information held by us will be one of the transferred assets; and
- if there are changes to our Group (such as a Group reorganisation), then other parties may use your data in the same way as set out in this notice.

## **Fraud Prevention Agencies (FPAs)**

We may need to confirm your identity before we provide products or services to you or your business. Once you have become a customer of ours, we will also share your personal information as needed with Fraud Prevention Agencies to help detect fraud and money-laundering risks.

We will use the information to:

- Confirm identities
- Help prevent fraud and money-laundering
- Fulfil any contracts you or your business has with us.

We or an FPA may allow law enforcement agencies to access your personal information. This is to support their duty to detect, investigate, prevent and prosecute crime.

## The information we share with the FPA

These are some of the kinds of personal information that we share with the FPAs:

- Name
- Date of birth
- Residential address
- History of where you have lived
- Contact details, such as email addresses and phone numbers
- Financial data
- Data relating to your or your business's products or services
- Employment details, (where provided)
- Data that identifies computers or other devices you use to connect to the internet. This includes your Internet Protocol (IP) address.

We and FPAs may process your personal information in systems that look for fraud by studying patterns in the data. This might mean that we find that an account is being used in ways that fraudsters work or we may notice that an account is being used in a way that is not normal for you or your business. Either of these could indicate a possible risk of fraud or money-laundering.

### How this can affect you

If we or an FPA decide there is a risk of fraud, money laundering, or another aspect of financial crime, we may stop activity on the accounts or block access to them. FPAs will also keep a record of the risk that you or your business may pose.

This may result in other organisations refusing to provide you with products or services, or to employ you.

### Data transfers out of the EEA

FPAs may send personal information to countries outside the European Economic Area ('EEA') including the United States of America to firms that adhere to the US Privacy Shield Framework. When they do, there will be a contract in place which contains clauses that have been approved by the European Commission as adequately protecting your personal information.

## Where do we use and store your personal information?

We will use and store your personal information both inside and outside the European Economic Area ('EEA') including to organisations located within the United States of America that adhere to the US Privacy Shield Framework.

If we do transfer information to our agents outside of the EEA, we will make sure that it is protected in the same way as if it was being used in the EEA by using one of the following safeguards:

- Transfer it to a non-EEA country with privacy laws that have been approved as providing the same protection as countries in the EEA. Learn more on the [European Commission Justice website](#).
- Put in place a contract with the recipient that contains clauses that have been approved by the European Commission as adequately protecting your personal information. Read more about this here on the [European Commission Justice website](#).
- Transfer it to organisations that are part of [Privacy Shield](#). This is a framework that sets privacy standards for data sent between the US and EU countries. It makes sure those standards are similar to what is used within the EEA. You can find out more about data protection on the [European Commission Justice website](#).

## If you choose not to give personal information

We may need to collect personal information by law, or under the terms of a contract we have with you.

If you choose not to give us this personal information, it may delay or prevent us from meeting our obligations. It may also mean that we cannot perform services needed to run your accounts or policies. It could mean that we cancel a product or service you have with us.

Any data collection that is optional would be made clear at the point of collection.

## Marketing

We may use your personal information to tell you about relevant products and offers. This is what we mean when we talk about 'marketing'.

We will only contact you for marketing purposes if you have provided your explicit consent for us to do so.

The personal information we hold for you is made up of what you tell us, and data we collect when you use our services, or from third parties we work with.

We study this to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you.

You have the right to ask us not to process your personal information for marketing purposes. You can exercise your right to prevent such processing by contacting us by phone, post or email using the details in the “Contact Us” section below. You can also unsubscribe from marketing communications by following the unsubscribe instructions included in every email or by logging into your client site and changing the marketing preferences within the Settings menu.

Whatever you choose, you'll still receive statements, and other important information such as changes to your existing products and services.

We may ask you to confirm or update your choices if you take out any new products or services with us in future. We will also ask you to do this if there are changes in the law, regulation, or the structure of our business.

If you change your mind you can update your choices at any time by contacting us.

## **How long we keep your personal information**

We will keep your personal information for as long as you are a customer of True Potential.

After you stop being a customer, we may keep your data for a period of time as prescribed with the TP Document Retention & Destruction Policy years for one of these reasons in relation to any ISA, GIA, On/Offshore Bond, Mortgage, Life Insurance:

- To respond to any questions or complaints
- To show that we treated you fairly
- To maintain records according to rules that apply to us
- To comply with relevant FCA record keeping requirements

For any pension products you may hold, we are required to retain data relating to these indefinitely.

We may keep your data for longer than the period of time prescribed with the TP Document Retention & Destruction Policy if we cannot delete it for legal or regulatory reasons. If we do, we will make sure that your privacy is protected and only use it for those purposes.

## **Safeguarding your personal information**

Keeping your personal information safe is very important to us so we will take all steps necessary to ensure that your personal information is treated securely and in accordance with this Privacy Notice and applicable data protection legislation.

To help protect your personal information and minimise the risk of it being intercepted by unauthorised third parties our secure servers employ Secure Socket Layer v3 (SSL) or Transport Layer Security v1 (TLS) encryption when you submit information to us through our sites. This security is signified by the "https" and the padlock on the URL bar. Some older browsers do not allow the use of current SSL technology and we therefore recommend that you use an up to date browser.

Once we have received your personal information, we will use strict procedures and security features to prevent unauthorised access.

## **Links to external websites**

Our sites may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. We will only ever support links to reputable companies who maintain the highest standards of data security in line with the GDPR.

If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies or how such websites collect and use your personal information. Please check these policies before you submit any personal information to these websites.

## **Social media widgets and applications**

Our sites may include functionality to enable sharing via third party social media applications, such as the Facebook Share button and Twitter widget. These social media applications may collect and use information regarding your use of our sites (see details on 'Social Sharing' cookies in our Cookie Policy).

Any personal information that you provide via such social media applications may be collected and used by that social media application and such interactions are governed by the privacy policies of the companies that provide the application. We do not have control over, or responsibility for, those companies or their use of your information.

## **Calls to 0871 700 0007**

When you call the True Potential LLP main client telephone number, 0871 700 0007, we will collect the Calling Line Identification information and retain a copy of the telephone call for our training and security processes, we will also use the information to help improve our efficiency and effectiveness.

Telephone calls are recorded and maintained securely within the UK and are only accessible by authorised True Potential staff members.

## **Cookies, analytics and web beacons**

Our sites use cookies to distinguish you from other users. This helps us to provide you with a good experience when you browse our sites and allows us to improve our sites. For detailed information on the cookies we use and the purposes for which we use them see our cookie policy.

When we send you an email, we may track whether you have opened that email and whether you have clicked any links it may contain. This helps us measure the performance of our email campaigns. We do this by including single pixel gifs, also called web beacons, in emails we send. Web beacons allow us to collect information about when you open the email, your IP address, your browser or email client type, and other similar details.

## **Individual rights under the GDPR**

The GDPR provides the following rights for individuals:

1. The right to be informed
2. The right of access
3. The right to rectification
4. The right to erasure
5. The right to restrict processing
6. The right to data portability
7. The right to object
8. Rights in relation to automated decision making and profiling.

## **Access to your information**

You have the right to request a copy of the personal information we hold about you, subject to certain exemptions.

If you would like a copy of some, or all, of this information you may contact us using the details below

We will NOT charge a fee for providing you with this information.

## **Letting us know if your personal information is incorrect**

If any of the information we hold about you is inaccurate or incomplete, you can ask us to make any necessary amendments to your data.

Please contact us if you want to do this using the details below.

If you do, we will take reasonable steps to check its accuracy and correct it.

## **What if you want us to stop using your personal information?**

You have the right in certain circumstances to object to our use of your personal information, or to ask us to delete your personal information or ask us to suspend our use of your personal information.

There may be legal or other official reasons why we need to keep or use your personal information. But please tell us if you think that we should not be using it and we will consider this.

If you want to object to how we use your data, or ask us to delete it or restrict how we use it or, please contact us using the details below.

## **What if I want to move my personal information to a different provider?**

You have the right to obtain your personal information in a structured, commonly used and machine-readable format and for it to be transferred to another organisation, where it is technically feasible.

This right only applies where the use of your personal information is based on your consent or for the performance of a contract, and when the use of your personal information is carried out by automated (i.e. electronic means).

## **How to withdraw your consent**

You can withdraw any consent you have given us at any time. Please contact us if you want to do so.

If you withdraw your consent, we may not be able to provide certain products or services to you. If this is so, we will tell you.

## **What if I have a complaint?**

You have the right to complaint to the Information Commissioner's Office where you think we have not used your personal information in accordance with data protection law. Details of how to do this can be found on [www.ico.org.uk](http://www.ico.org.uk).

## **Changes to our privacy notice**

We reserve the right to revise or supplement this Privacy Notice from time to time. We will place updates on our sites, inform you of the updates and where appropriate we will give you reasonable notice of any changes.

## Contact us

If you have any queries regarding privacy issues, you can email us at [dataprotection@tpllp.com](mailto:dataprotection@tpllp.com), or write to us at:

True Potential LLP  
Newburn House  
Gateway West  
Newburn Riverside  
Newcastle Upon Tyne, United Kingdom  
NE15 8NX

Alternatively, you can call us on 0871 700 0007.

# Cookie Policy

## What are Cookies?

'Cookies' are used on almost every website. They are small text files that are saved on your computer to help the site perform a number of functions. We use cookies for several reasons. For example, they allow us to keep you secure when you log in to your online account, provide online account application forms, monitor the number of people using our website and help us understand more about the way in which people use our website.

By using our website, you are agreeing to the placement of cookies on your computer.

Cookies used by [www.tpllp.com](http://www.tpllp.com):

- Do not contain any personally identifiable information about you
- Do not (and cannot) allow us to access other information stored on your computer
- Do not (and cannot) give us information about other websites you visit or your activities on other websites
- Do not store any information about you that others could read and understand, or in any way compromise your security
- Do allow us to provide a service whereby people can access their account, place a deal or open a new account, securely
- Do allow us to retain your login information to help you access your account easily, if you request this. You should not ask us to remember your login information if you are on a public computer
- Do allow us to monitor the number of people using our website and collectively monitor their activities. We cannot identify what you, as an individual, do on our site
- Do allow us to see how people arrive at our site (e.g. search for 'True Potential' on a search engine, or click on an email we have sent)
- Do allow us to collectively gather a little technical information about people using our site, such as their geographic location (to city level) and the type of web browsers they are using. We cannot identify where you, as an individual, are located or the software or services you are using
- Do allow us to display adverts on other websites, to people who have previously accessed the True Potential website. We cannot identify individuals to whom adverts may be displayed
- Do allow the website to recall certain settings and preferences to make using the True Potential site easier. We cannot identify what your individual preferences or settings are

## Types of Cookie We Use

**Session cookies** are stored on your computer and remain available for the duration of your visit to our website. When you close your browser, any session cookies that have been set will be automatically removed from your computer's memory.

**Persistent cookies** are stored on your computer and remain there until they reach their expiration date or you choose to delete them. At this point, the browser will delete the cookie from your computer's hard drive. While the persistent cookie is present, the website that created it will have access to that cookie each time you return to that particular site.

We make use of both types of cookie in order to maximise the security of our services and to ensure you always get an optimal service from our site. We do not use cookies to track your use of the internet after leaving our website, nor do we store any information about you in cookies that others could read and understand.

## First and Third-Party Cookies

Whether a cookie is 'first' or 'third' party refers to the website/service placing the cookie. First-party cookies are those set by us. Third-party cookies are cookies that are authorised by us but provided via one of our suppliers. In some limited cases, we may use our suppliers to manage some of these cookies for us, but we never allow any third party to use these cookies for their own purposes.

## How We Classify the Cookies We Use

We use a system of classification developed by the International Chamber of Commerce. This allows us to classify the different types of cookies that we use on our website to provide you with more information about why we use them.

**Strictly necessary cookies** are cookies that are essential in providing specific services you have requested from us. For example:

- Remembering information, you have entered on online application forms when you navigate to different pages in a single web browsing session
- Maintaining a logged-in session on our website

**Performance cookies** aim to improve our website by collecting information about how you use our website. For example:

- Counting the number of visitors and how they move around our website
- Understanding what interests our users so that we can deliver the content and level of service you expect from us
- Helping us to improve our website by measuring errors experienced by users of our site
- Testing different designs or content on our website

**Functionality cookies** will typically be set because of an action you have taken on our website but may also be set in the delivery of other services. For example:

- Saving preferences when using interactive share charts
- Promotional cookies collect information about your browsing in order to deliver promotions relevant to you and your interests. We may, from time to time, use this type of cookie on our website to deliver promotions relevant to you
- Promotional cookies may also be used to limit the number of times you see a promotion as well as help measure the effectiveness of the promotion.

## Google Analytics

This website uses Google Analytics, a web analytics service provided by Google Inc. ('Google').

Google Analytics uses cookies to help True Potential analyse how users use this website. The information generated by the cookie about your use of this website (including your IP address) will be transmitted to and stored by Google on servers in the United States. Google will use this information for the purpose of evaluating your use of this website, compiling reports on website activity for website operators and providing other services relating to website activity and internet usage. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. Google will not associate your IP address with any other data held by Google.

You may refuse the use of cookies by selecting the appropriate settings on your browser, however please note that if you do this you may not be able to use the full functionality of this website.

By using this website, you consent to the processing of data about you by Google in the manner and for the purposes set out above.

## Using Browser Settings to Manage Cookies

Most web browsers allow you to manage cookies via the browser settings. For example, you may choose to delete existing cookies, prevent your browser from accepting new cookies, have the browser notify you when you receive a new cookie or disable cookies altogether.

True Potential LLP

Head Office: Gateway West, Newburn Riverside, Newcastle upon Tyne, NE15 8NX

London Office: 42-44 Grosvenor Gardens, Belgravia, London, SW1W 0EB

T: 0871 700 0007 E: [discover@tpllp.com](mailto:discover@tpllp.com) W: [tpllp.com](http://tpllp.com)

True Potential LLP is registered in England & Wales as a Limited Liability Partnership No. OC380771.