



Data Protection | Privacy Notice

Who We Are

MKC Wealth Limited (“MKC Wealth”, “we”, “us”, “our”) is a firm authorised and regulated by the Financial Conduct Authority (FCA).

We are the **Data Controller** in respect of the personal data described in this Privacy Notice.

Registered Office:

Walsingham House
35 Seething Lane
London
EC3N 4AH

Email: enquiries@mkcwealth.co.uk

If you have any questions about this notice or how we handle your personal data, please contact us using the details above.

The Personal Data We Collect

We collect and process personal data necessary to provide financial planning and investment advice services.

This may include:

Identity Data

- Name, title, date of birth
- National Insurance number
- Passport or driving licence details
- Marital status and dependants

Contact Data

- Address
- Email address
- Telephone numbers

Financial Data

- Income and expenditure
- Assets and liabilities
- Bank details
- Investment and pension arrangements
- Source of wealth and source of funds

Transaction Data

- Details of investments, contributions, withdrawals and transfers
- Product performance data
- Ongoing service records



Risk & Suitability Data

- Attitude to risk assessments
- Capacity for loss
- Financial objectives and planning assumptions

Special Category Data

Where necessary for the provision of advice (for example, in relation to insurance or protection products), we may process data concerning your health.

Technical Data

- IP address
- Website usage data via cookies
- Device and browser information

Vulnerability and Personal Circumstances

To provide suitable financial planning and meet our regulatory obligations, we may collect information about your personal circumstances, including life events and potential vulnerabilities.

This may include information relating to health conditions, bereavement, financial hardship, cognitive impairment, caring responsibilities or other significant life changes.

We use this information to:

- Ensure advice is appropriate and tailored to your circumstances
- Act in your best interests in line with FCA requirements
- Meet our obligations under Consumer Duty and vulnerable customer guidance
- Provide appropriate support and mitigate foreseeable harm

Where this includes special category data (such as health information), we rely on explicit consent and/or where necessary for the establishment, exercise or defence of legal claims. In other cases, processing is based on contractual necessity and our legitimate interests in delivering suitable advice.

We collect only information that is relevant and proportionate and apply appropriate confidentiality safeguard.

Information About Connected Individuals

If you provide us with personal data about family members, dependants or other connected individuals, you must ensure that:

- You have authority to share that information; and
- You have provided them with a copy of this Privacy Notice.

Lawful Basis for Processing

Under UK GDPR, we rely on the following lawful bases:

Article 6 – Personal Data

We process your personal data because:

- a) Contractual necessity**
 - Processing is necessary to provide financial planning and advisory services to you.
- b) Legal obligation**
 - We are required to process certain data to comply with FCA rules, anti-money laundering legislation, tax legislation, and other regulatory obligations.
- c) Legitimate interests**
 - We retain and process data where necessary to:
 - Assess suitability and appropriateness of our services



- Defend complaints or legal claims
- Maintain professional indemnity insurance
- Improve service quality and risk management

d) Consent

- Where we rely on consent (for example, marketing communications), you may withdraw your consent at any time.

Article 9 – Special Category Data

Where we process health data or other special category data, we rely on:

- **Article 9(2)(a)** – Explicit consent; and/or
- **Article 9(2)(f)** – Establishment, exercise or defence of legal claims.

How We Use Your Information

We use your information to:

- Provide financial advice and arrange financial products
- Conduct suitability and appropriateness assessments
- Meet FCA regulatory requirements
- Prevent financial crime and verify identity
- Manage complaints
- Maintain internal governance, risk management and compliance systems
- Communicate with you regarding your services
- Send marketing communications (where you have consented)

Who We Share Your Information With

We may share your information with:

- Product providers and investment platforms
- Discretionary investment managers
- Professional advisers (compliance consultants, auditors, legal advisers)
- Identity verification and anti-financial crime agencies
- IT and cloud service providers
- Regulators including the Financial Conduct Authority
- Our professional indemnity insurers

Where third parties process data on our behalf, we ensure appropriate contracts are in place under Article 28 UK GDPR.

We may share your personal data in connection with a potential or actual sale, merger, acquisition, restructuring, refinancing or transfer of all or part of our business.

This may include sharing information with:

- Prospective purchasers or investors
- Corporate finance advisers
- Legal advisers
- Accountants and auditors
- Regulatory authorities
- Professional indemnity insurers

Such disclosures will only occur where necessary for the purposes of:

- Conducting due diligence
- Assessing business value and risk
- Complying with regulatory or legal requirements
- Facilitating the proposed transaction



Where possible, information will be anonymised or aggregated during the early stages of due diligence. Where identifiable personal data is required, it will be shared subject to strict confidentiality obligations and appropriate contractual safeguards.

The lawful basis for this processing is **legitimate interests**, namely our legitimate interest in evaluating and executing corporate transactions and ensuring business continuity.

If a transaction completes, your personal data may be transferred to the new owner, who will continue to use it for the purposes of providing financial planning and advisory services in accordance with applicable data protection laws.

We will ensure that any such transfer complies with UK data protection legislation and that your rights continue to be protected.

We will not sell your personal data.

International Transfers

Some of our service providers may store or process data outside the United Kingdom.

Where this occurs, we ensure appropriate safeguards are in place, including:

- UK adequacy regulations; or
- International Data Transfer Agreements (IDTAs); or
- Standard Contractual Clauses (SCCs).

Data Retention

We retain your data only for as long as necessary for legal, regulatory and business purposes.

As an FCA-regulated firm, we are subject to record-keeping requirements including:

- **Five years** – Investment business
- **Three years** – Mortgage and insurance business
- **Indefinite retention** – Pension transfers, opt-out business and FSAVC advice
- AML identity verification records are retained for at least **five years** after the end of the business relationship.

Where lawful and appropriate, we may retain data longer to defend potential legal claims.

Your Rights

Under UK GDPR, you have the right to:

- Access your personal data
- Rectify inaccurate data
- Request erasure (subject to regulatory obligations)
- Restrict processing
- Object to processing based on legitimate interests
- Object to direct marketing
- Data portability
- Not be subject to solely automated decision-making

We will respond to requests within one month unless an extension is lawfully required.

To exercise your rights, please contact us using the details above.



Data Security

We implement appropriate technical and organisational measures to protect your personal data, including:

- Access controls
- Encryption in transit and at rest
- Secure IT infrastructure
- Role-based permissions
- Incident response procedures
- Regular security reviews

We are committed to maintaining high standards of information security consistent with regulatory expectations.

Cookies

Our website uses cookies to:

- Monitor website usage
- Improve user experience
- Generate statistical reports

You can manage cookies via your browser settings.

For more information, please see our Cookie Policy.

Other websites

Our website may contain links to other websites. This privacy policy only applies to the www.mkcwealth.com website so when you link to other websites you should read their own privacy policies.

Complaints

If you are unhappy with how we handle your personal data, please contact us first so we can resolve the issue.

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

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Website: <https://www.ico.org.uk>

Changes to This Notice

We keep this Privacy Notice under regular review and will update it when necessary. The latest version will always be available on our website.

Supplement - Use of Artificial Intelligence (AI) and Automated Tools

As part of delivering financial planning and advisory services, we may use technology tools incorporating artificial intelligence ("AI"), machine learning, and automated data analysis.



How We Use AI

We may use AI-enabled systems to:

- Analyse financial information to support suitability assessments
- Assist in cashflow modelling and forecasting
- Review documentation for completeness and consistency
- Identify missing or inconsistent client information
- Support risk profiling and portfolio analysis
- Detect potential financial crime or unusual activity
- Improve operational efficiency and service quality

AI tools are used as **decision-support systems**. They assist our advisers and technical teams but do not replace professional judgement.

All advice recommendations are reviewed and approved by a qualified financial adviser.

Lawful Basis

Processing involving AI tools relies on the same lawful bases set out in Section 4 of this Privacy Notice, including:

- Contractual necessity
- Legal obligation
- Legitimate interests
- Explicit consent (where special category data is processed)

Where AI systems process special category data (such as health information relevant to protection advice), this will be subject to appropriate safeguards and explicit consent where required.

Automated Decision-Making

We do not make decisions about you based solely on automated processing that produce legal or similarly significant effects without human involvement.

Where automated tools assist in analysis, a qualified adviser reviews the outputs before any advice or recommendation is provided.

You have the right to:

- Request human review of any automated assessment
- Express your point of view
- Contest a decision

Data Minimisation and Security

Where AI tools are used:

- We limit data inputs to what is necessary for the relevant task
- We use secure systems with appropriate contractual safeguards
- We conduct due diligence on AI vendors
- We assess risks relating to bias, accuracy, explainability and fairness
- We maintain human oversight and governance controls

Where AI providers act as data processors, we ensure appropriate Article 28 UK GDPR contracts are in place.



Model Training and Data Use

Your personal data will not be used to train third-party public AI models.

Where AI systems improve through internal learning processes, this occurs within secure environments under our control or under contractual safeguards.