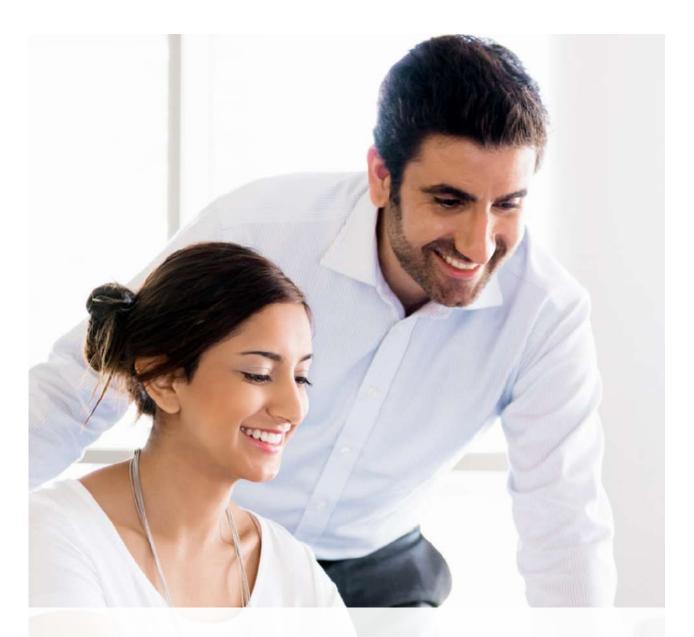


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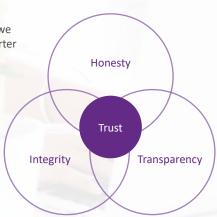
# About Gale & Phillipson

Our goal is to improve the wealth of all those we interact with, whilst acting honestly, transparently and with integrity.

The fair treatment of our clients is central to everything we do. To ensure that we build an ongoing relationship based on trust, we agree to follow our Client Charter which is to:

- provide suitable, comprehensive and tailored advice that is relevant to your needs if something is not in your best interest, we will advise you of this;
- Clearly explain our recommendations prior to the advice implementation stage, as well as any costs and fees that are to be incurred;
- >>> treat you as we would like to be treated ourselves we will never take advantage of you and will always ask for your feedback to improve our service and the relationship with you.

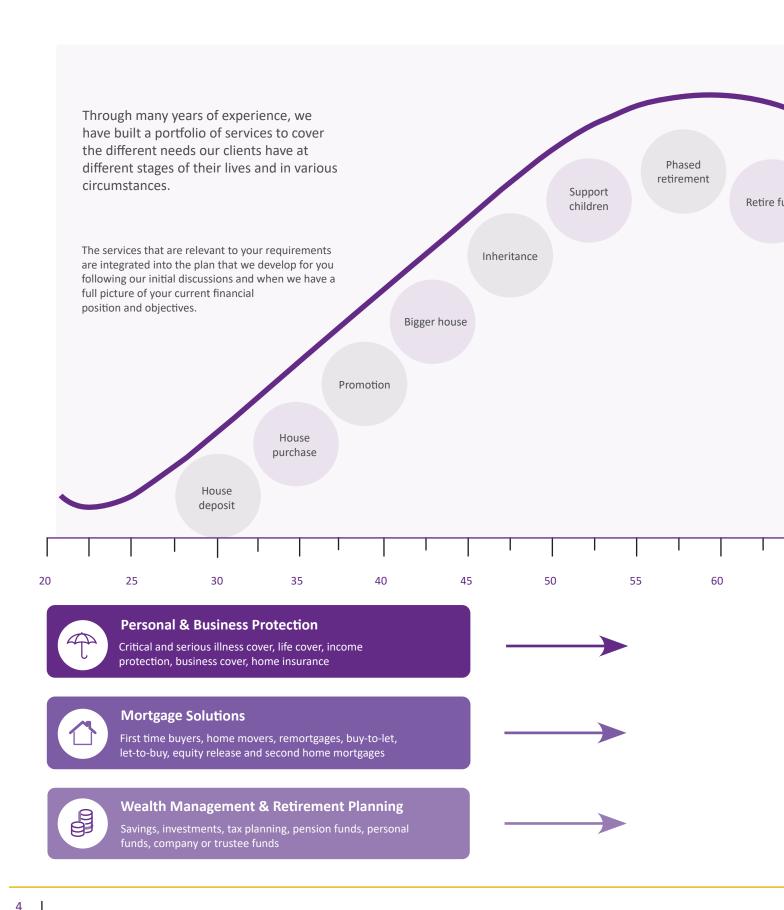
**Our Core Values** 

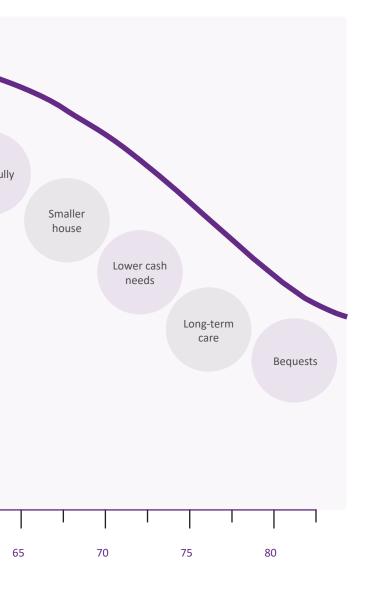


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# **Our Services**

The various stages of your financial life that we can help you with.





Wealth Preservation

Estate planning, succession planning, trusts, cashflow modelling

Your needs are covered from buying your first home, protecting your assets, and planning for - and then entering - retirement.

## **Security & Business Protection**

- » Mortgage Solutions
- » Life Assurance
- » Critical Illness Cover
- » Income Protection
- » Accident, Sickness or Unemployment Cover
- » Introduction to Wills and Estate Planning Support
- » Long-Term Care Cover
- » Employer/ee Benefits
- » Key Person Protection
- » Shareholder/Partnership Protection
- » Home Insurance

### Wealth Creation & Management

- » Regular Savings
- » School Fees Planning
- » Investing for Income
- » Investing for Capital Growth
- » IHT Mitigation
- » Use of Trusts
- » Tax Planning via use of Allowances
- » Retirement Planning
- » Employer/ee Benefits
- » Introduction to Investment Management Professionals

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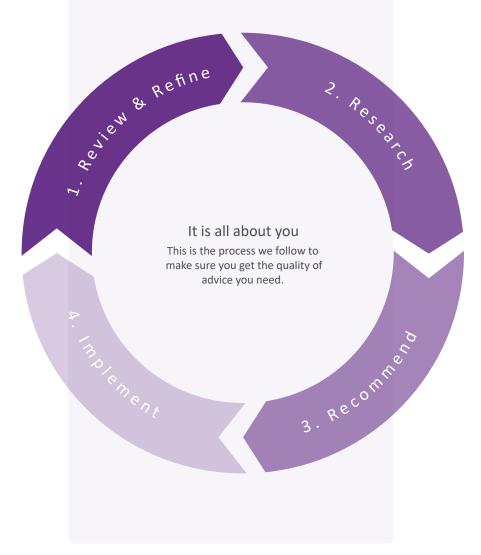
# Our Client Journey

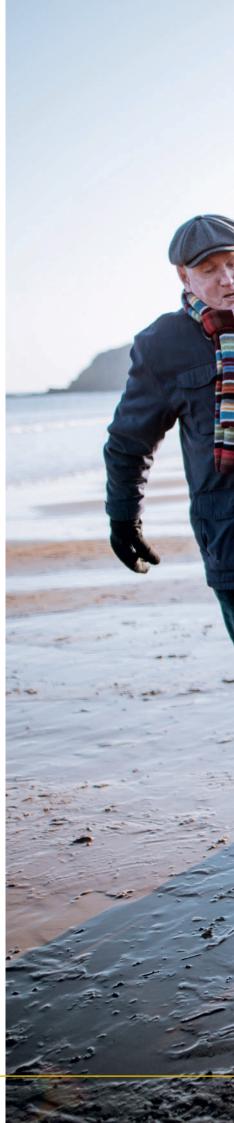
We follow a simple, proven approach with all our clients.

### About our approach

Working with you, we will identify the mix of solutions, products and services best suited to meet your needs and develop an integrated plan covering the financial areas of your life on which you wish us to make recommendations.

If you choose, we will meet on an ongoing basis to assess your plan.





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### 1. Review & Refine

We will look at all of your existing provisions and review your overall progress towards achieving your financial goals and, where required, refine strategies or advice to keep you on target.

#### 2. Research

We will then explore and research various scenarios to make best use of your existing plans, whilst giving you the best opportunity of achieving your financial goals and objectives.

#### 3. Recommend

After completing our research, we will then meet with you to present and explain any recommendations and the next steps. We will also answer any questions that you may have.

## 4. Implement

With your agreement to proceed, we will then liaise with providers and lenders to ensure that any recommendations are implemented in an appropriate and timely manner.



# Our Ongoing Service

Helping ensure you are still on track to achieve your financial goals and objectives.

Choosing a financial adviser is one of the most important decisions you will ever make. Many people do not have significant knowledge of financial products and are concerned about asking questions.

We welcome questions and consider them an important part of the process of us getting to know each other.

Our ongoing process enables us to work together to build the right plan for you. Once the plan has been agreed and implemented, a key part of moving towards your financial goals is undertaking a regular review of performance together with considering the potential impact on the plan of any changes in your circumstances and/or in the marketplace.

By engaging with our ongoing service, you assure yourself of regular financial check-ups, access to new ideas and a team committed to helping you to meet your goals.

This will include an ongoing suitability review of any investments we have recommended; we will carry out this review at least annually.

To do this, we will need to make contact with you to assess whether the information we hold about you remains accurate and up-to-date.

We will then issue you with a report setting out the results of our assessment and, if relevant, any updated recommendations.

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The ongoing service we provide is paid for via a fee agreement, set out to you in advance.

You choose the ongoing service offering that you require, which consists of:

- » A regular review of your financial plan.
- » Contact with your adviser across multiple communication methods.
- » Information provided to you that is both relevant and pertinent to your circumstances and your financial plan.

Service Offering	Premier	Bespoke
Frequency of Adviser Meeting	Annually	Frequency based on client need, at least annually
Dedicated Client Services Team	✓	✓
Client Profile	✓	✓
Annual Suitability Review	✓	✓
Other services (or frequency of service) as agreed with you		✓

» We also have available a Transactional Service which will be charged for on an ad hoc basis.

# The Value We Add

In addition to providing leading edge solutions, clients tell us that we add value to them by:

#### **Utilising existing provisions**

Utilising their existing provisions (e.g. savings, company benefits, current plans) first before considering starting a new plan.

### Increasing tax efficiency

Placing their assets in the right name, ownership and tax wrapper so that they legally and ethically ensure they do not pay too much tax.

#### **Getting money back**

Making sure they do not miss out on getting their own money back that might be owed (e.g. tax relief on pension and retirement planning).

### **Maintaining goals**

Understanding their financial goals, aligning our advice to them, and ensuring we keep these goals top of mind.

## **Reviewing risk levels**

Reassuring them that they are not unnecessarily taking too much risk with their current assets to achieve their goals.

### Obtaining the right mortgage

Checking how best to structure the term of any borrowing, in connection with their age, objectives and retirement plans.

#### Securing the correct rate

Ensuring they obtain the best possible rate for their borrowing requirement based on their individual circumstances.

#### **Analysing personal changes**

Checking how any personal changes in income or capital wealth may impact their current provisions or tax situation.

#### **Summarising budget impacts**

Explaining, in simple terms, how the UK Budget announcements impact them as a result of changes in legislation.

#### Sending appropriate reminders

Reminding them so that they do not miss out on valuable allowances that, once gone, are gone forever (e.g. ISAs).



# Quantifying the Value

Research from Royal London and ILC shows that receiving financial advice resulted in a £47,706 wealth uplift over the course of a decade.

Quantifying the value of financial advice has always been a challenge because people who take financial advice have different characteristics to those who do not. But what if it was possible to control those differences and isolate a pure 'advice effect'?

This was the challenge set by Royal London to researchers at the International Longevity Centre – UK (ILC) to understand the impact financial advice has on client finances over a 10-year period. The ILC is the UK's specialist think tank on the impact of longevity on society, and what happens next.

#### The study's three key findings

- Receiving professional financial advice between 2001 and 2006 resulted in a total boost to wealth (in pensions and financial assets) of £47,706 in 2014/16.
- The benefits of financial advice are potentially greater for those we term "just getting by" than for those we consider "affluent"; the former would have seen a 24% boost to their pension wealth compared to 11% for more affluent groups (those most likely to be advised).
- Evidence also suggests that fostering an ongoing relationship with a financial adviser leads to better financial outcomes. Those who reported receiving advice at both time points in our analysis had nearly 50% higher average pension wealth than those only advised at the start.

Source: ILC, What it's worth - Revisiting the value of financial advice, December 2019

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# Our Fees

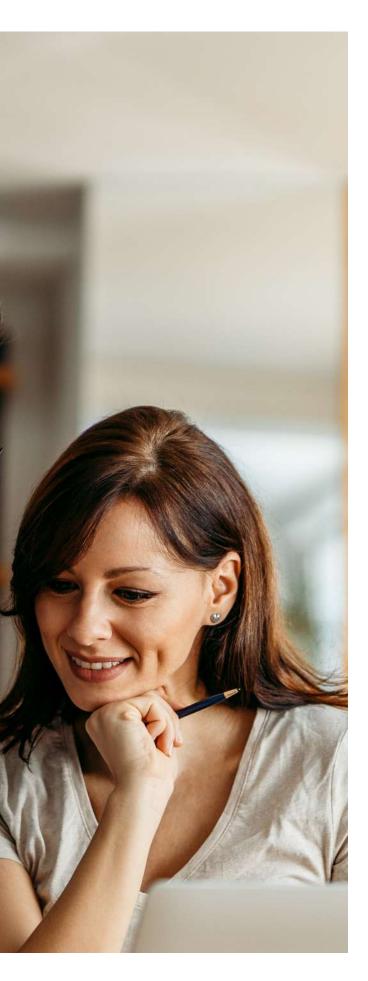
Our goal is to be as clear and transparent as possible.

- >>> We will not charge you any fee until we have agreed with you how and when we will be paid.
- >> You will receive clear details on what the total fee is, the advice or service it relates to, how we have calculated it and when you need to pay.
- >>> We will explain your payment options to you and answer any questions you may have.
- >>> You choose how you pay us, whether you use our ongoing service or just use us for a one-off financial need.
- >> You are not obliged to implement any of our advice or recommendations; however, we may still charge a fee for our advice.
- As we provide an intermediation service, usually no VAT is due. We will tell you if there is an occasion when VAT is due.
- >>> We never handle cash.
- >>> Specific details of our fee structure are set out in our Terms of Business document, provided separately.

# **Authority to Proceed Agreement**

You will be asked to sign an Authority to Proceed agreement which will confirm any specific fees for providing and/or implementting advice or ongoing services and the method of payment.





Here we set out the various ways in which we might receive payment for our advice and services:

### Provider facilitation of your fee

- » If you decide to follow our recommendation and invest, you may authorise the investment provider to deduct our fee for advice from your investment.
- » You may also pay any ongoing service charges from your investment.
- » In some circumstances, this could create a capital gain and a possible tax liability. We would take this into account in our recommendation.

#### Paying us directly

- » We may charge you a fee for advice.
- » We may also receive commission from an insurance company or mortgage lender.
- » We explain our fees in our Terms of Business document.
- We will agree with you in advance the fees we will charge. We will set this out in our Authority to Proceed document.
- » You may pay us by cheque or bank transfer.

#### Provider payments to us

- » We do not receive commission for setting up regulated investment products. However, we may receive commission on certain non-regulated products and mortgages.
- » If we do receive commission, we will tell you how much in a Key Facts Illustration.

#### Introducer payments

» We may also receive an introducer fee, should we pass your specific enquiry on to a specialist professional adviser. If this happens, we will tell you.

# **Privacy Notice**

This Privacy Notice explains: who we are, what personal information we collect, how we use your personal information, who we share your information with and why, how we keep your information secure, your rights and how to contact us.

#### Who we are

Gale and Phillipson is a firm of Independent Financial Advisers and is able to consider all types of retail investment products from all product providers across the whole of the market which could meet your needs and objectives. We are fully committed to remaining independent in the future because we genuinely place the client at the heart of our business.

Personal information includes your name, address, or phone number and other information that you give to us. We collect personal information about you when you contact us about products and services, visit an adviser, visit a website we may have or register to receive one of our newsletters. The type of personal information we collect will depend on the purpose for which it is collected and includes:

- Contact details
- » Information to verify your identity
- » Family, lifestyle, health, and financial information
- » Payment details

We collect personal information directly from you. For example, we ask for personal information at the start of our relationship and in subsequent communications, in order to check your identity and protect you from fraud. This is a legal requirement and is important to help safeguard you against potential crime.

#### Special category information

In some instances, it is necessary to collect more sensitive information (such as health or lifestyle information) which is called special category data. This is to allow us to provide our financial advice service to you. We will always obtain your consent during the advice process to gather this data and explain what information we require and why it is needed. Sensitive personal information will always be processed and stored securely. You can withdraw your consent at any time to us processing this data; however, this may mean that you can no longer access the service or product the information was gathered for.

#### Data retention

We will keep your personal information where it is necessary to provide you with our products or services while you are a customer with us and where it is reasonably required for the purposes set out in this privacy notice. We are also subject to regulatory requirements to retain your data for specified minimum periods. These are, generally:

- » Five years for investment business
- Three years for mortgage and insurance business
- » Indefinitely for pension transfers and opt outs

We may also keep your information after this period but only where it is required to meet our legal, regulatory, tax or accounting obligations. For example, we are required to retain accurate records of your dealings with us to respond to any complaints, challenges, litigation or queries that you or others may raise in the future. Therefore, length of time we keep your information for these purposes will vary depending on the obligations we need to meet and can be viewed in our data retention policy.

#### On what basis do we collect data

The processing of your personal data is allowed under a number of lawful bases. The data required for the provision of products and services is processed on the basis there is a contract with you to do so. Any relevant marketing activity we undertake is done because, as a firm, we have a legitimate interest to do so. However, you have rights, as listed below, which impact how we can use and process your data, including the option to opt-out of any marketing.

#### How we use your personal information

We process your data under a variety of legal bases as detailed below:

We process your information in order to support and maintain our contractual relationship with you.

- » Providing our advice, products or services to you
- Carrying out transactions you have requested

and to comply with legal and regulatory requirements. This includes the following:

- » Confirming and verifying your identity for security purposes
- » Detecting and preventing fraud, crime, money laundering or other malpractice
- » To investigate any complaint or enquiry raised in regards to your adviser or the advice given
- » Audit and record keeping purposes

We also process your data for specific business purposes to enable us to give you the best products and services and the best and most secure experience. We process your data under legitimate interest in the following circumstances:

- » Enhancing, modifying, and personalising our services for the benefit of our customers
- » Providing communications which we think will be of interest to you
- » Market or customer satisfaction research or statistical analysis
- » Enhancing the security of our network and information systems
- Send you marketing materials
- Supporting the testing and maintenance of systems
- We may also process your personal data as part of an acquisition or sale. Should this happen, you will be notified about any change to processing or data controller arising as a result of this activity.

You have the right to object to some of our processing if you wish, please see 'Your Rights' section below. Please bear in mind that if you object this may affect our ability to carry out the tasks above for your benefit.

#### Who we share your information with and why

We share your information with trusted third parties who perform tasks for us and help us to provide the services you require, these include:

- » Our ultimate parent company, Solomon Capital Holdings Limited and its subsidiaries and affiliates;
- » Other adviser firms within the Gale and Phillipson network for the purpose of providing you with advice (with your Consent);
- » Other subsidiaries within Solomon Capital Holdings Limited to enhance the services and products we can offer you;
- Third parties to verify your identity, in line with money laundering or other requirements (this may involve carrying out checks with credit reference databases);
- Third parties who perform tasks for us to help us set up or service your plan (these third parties may be based in countries outside the UK but where they are, we'll undertake an assessment of safeguards in place);
- » Other organisations, including regulatory bodies, the police and fraud prevention agencies, to prevent and detect fraud;
- » Third parties where required by law, court order or regulation; and
- » Third parties as part of an acquisition or sale.
- » Gale and Phillipson or its third parties for assurance or audit purpose

#### Where your information is processed

The majority of your information is processed in the United Kingdom. However, some of your information may be processed by us or the third parties we work with outside of the UK, such as the EEA, the US, India and Ireland.

Where your information is being processed outside of the UK, we take additional steps to ensure that your information is protected to at least an equivalent level as would be applied by UK data privacy laws e.g. we will put in place legal agreements with our third party suppliers and do regular checks to ensure they meet these obligations.

Our security controls are aligned to industry standards and good practice; providing a controlled environment that effectively manages risks to the confidentiality, integrity and availability of your information.

#### How we keep your information secure

We're committed to ensuring the confidentiality of the personal information that we hold and we continue to review our security controls and related policies and procedures to ensure that your personal information remains secure. When we contract with third parties, we impose appropriate security, privacy and confidentiality obligations on them to ensure that personal information is kept secure. If we work with third parties in countries outside the UK, we ensure these are countries that the UK has confirmed have an adequate level of protection for personal information, or the organisation receiving the personal data has provided adequate safeguards. In limited circumstances, data may be accessed outside of the UK i.e. by employees when they travel. In these circumstances, we ensure there are appropriate information security measures in place to safeguard your information.

#### Your rights

Gale & Phillipson tries to be as open as it can be in terms of giving people access to their personal information and therefore have outlined your rights below. This privacy notice was drafted with brevity and clarity in mind, therefore further information can be gathered by contacting us using the details below, or more information about your data protection rights can be found here:

https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/

#### Marketing

You have the right to opt-out of receiving marketing information and tell us what your communication preferences are by using the opt-out option on any email marketing. You may opt-out at any time if you don't want to receive any further communications of this nature.

#### Individual data rights and requests

If you wish to correct, restrict, delete or make changes to your personal information, or any of the data subject rights listed below, please contact us at the address or email provided below.

- » The right to be informed You can request that we provide 'fair processing information', typically through this privacy notice;
- The right of access You may request a copy of the personal information we hold about you using the contact details found on the end of this privacy notice;
- "> The right to rectification The accuracy of your personal information is important to us. You have the right to ask us to update or correct your personal information;
- » The right to erasure You may request the deletion or removal of personal data where there's no compelling reason for its continued processing;
- » The right to object You may object to the processing of your data based on legitimate interests;
- ">The right to restrict processing You have a right to request we 'block' or suppress processing of your personal data;
- » The right to data portability You may request to obtain and reuse your data; and
- The right not to be subject to automated decision-making including profiling.

#### How to complain

If you wish to raise a complaint about how we have handled your personal data, you can contact us at 01609 760 960 or enquiries@galeandphillipson.co.uk and we will do our utmost to make things right. If you are still unhappy, you can make a complaint to the Information Commissioner's Office, who are the UK's independent authority charged with upholding information rights in the public interest, promoting openness by public bodies and data privacy for individuals. You can contact them on 0303 123 1113, or at Information Governance Department, Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF. www.ico.org.uk/concerns



Gale and Phillipson Investment Services Ltd, Gale and Phillipson Advisory Services Ltd, Gale and Phillipson General Financial Services Ltd and Gale and Phillipson (SE London) Ltd are all authorised and regulated by the Financial Conduct Authority (Reference Numbers 431387, 142752, 195080). Gale and Phillipson (Herts) Ltd and Gale and Phillipson Consulting Ltd are appointed representatives of Gale and Phillipson Advisory Services Ltd. Gale and Phillipson (Surrey) Ltd is an appointed representative of Gale and Phillipson Investment Services Ltd. (Reference Numbers 615821, 811525, 703337). All companies trade under the name Gale and Phillipson and are registered in England and Wales numbers 05409822, 02232959, 03751076, 04077157, 08864945, 11334836 and 04823391. Registered office for all companies is Gallowfields House, Fairfield Way, Richmond, DL10 4TB.

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