Nine Edge Wealth
19a Hill Street, Edinburgh, EH2 3JP
Tel: 0330 236 8193 | Enquiries@nineedge.co.uk

DATA PROTECTION AND PRIVACY NOTICE

Nine Edge Wealth | Version 1.0 | 27 October 2026

1. Introduction

Nine Edge Wealth is committed to protecting your personal information and respecting your privacy. This Privacy Notice explains your rights together with how we gather, use and share your personal information when providing our services to you.

Nine Edge Wealth acts as the Data Controller for the personal information you provide.

We rely primarily on lawful bases other than consent (such as performance of a contract or legal obligation) to process your personal data. Where consent is required — for example, for special category data — we will seek your explicit consent and you may withdraw it at any time. We confirm that all such information is essential for the provision of regulated advice and satisfies the requirements of the Financial Conduct Authority.

Your Data Protection Rights	*A summary of your rights under UK GDPR is set out in Section 8 of this Notice. To exercise any of your rights or to raise a data protection concern, please contact us at: Nine Edge Wealth, 19a Hill Street, Edinburgh, Scotland, EH2 3JP or by email at the address shown above.*

2. Who We Are

Nine Edge Wealth Limited is authorised and regulated by the Financial Conduct Authority (FRN 497847). Registered in Scotland, Registered No. SC355848. Registered Address: 19a Hill Street, Edinburgh, EH2 3JP

If you have any questions about this Notice or how we handle your personal information, please contact us using the details shown on this document.

3. What Personal Data We Collect and Why

We collect and process personal data about you in order to:

- Provide financial advice, planning and associated services
- Carry out identity, credit and fraud prevention checks
- Communicate with you and maintain accurate records
- Meet our legal and regulatory obligations, including under FCA rules and Anti-Money Laundering Regulations
- Manage our ongoing relationship with you

The types of personal data we may collect include:

- Identity information — name, date of birth, National Insurance number, passport or driving licence details
- Contact information — address, telephone number, email address
- Financial information — income, assets, liabilities, pensions, investments, tax status
- Employment information — employer details, occupation, employment status
- Family and personal circumstances — marital status, dependants, estate planning wishes
- Health information (special category data) — where relevant to advice on protection products or retirement planning, collected only with your explicit consent

4. How We Gather and Use Your Personal Information

We collect information directly from you, usually during meetings, by telephone, or by electronic communication. We may also obtain information from:

- Product providers (such as investment, pension or insurance providers) where you have authorised data sharing
- Your other professional advisers (such as accountants or solicitors) where you have given permission
- Electronic identity verification and credit reference services
- Recorded or noted conversations and meetings to maintain an accurate record of discussions

We hold and process this information as Data Controller in accordance with applicable data protection law in the United Kingdom.

We use this information to:

- Analyse your current and future financial needs and provide suitable personal advice
- Comply with legal and regulatory obligations including FCA rules, AML requirements and recordkeeping
- Manage our relationship with you and maintain client records
- Support compliance monitoring, business administration and quality assurance

We will not share your information with any other party except as described in this Notice or where required by any statutory, governmental or regulatory body for legitimate purposes.

5. Legal Basis for Collecting and Processing Your Information

We process your personal data under the following lawful bases:

Performance of a contract

Most of the personal information you provide is collected and processed to enable us to deliver the financial advice and related services you have requested from us.

Legal obligation

We are subject to legal and regulatory obligations under financial services regulation, anti-money laundering legislation and tax law. These may require us to collect, retain and in some cases report personal data regardless of consent.

Legitimate interests

We may process certain personal data where it is necessary for our legitimate interests in managing and developing our business — for example, for internal analysis, quality assurance, or the prevention of fraud — provided those interests do not override your rights and freedoms.

Consent

Where we rely on consent as our lawful basis — including for special category personal data (such as health information) and for direct marketing communications — we will seek your explicit consent before processing. You may withdraw consent at any time without affecting the lawfulness of processing carried out before withdrawal. Where you provide information about another person (such as a spouse, partner or dependent), we will only process that data where it is strictly necessary to provide the agreed advice and services.

6. Sharing and Transferring Your Personal Information

In the course of providing financial advice and services, we may share your information with:

- Providers of investment, pension, protection and insurance products
- Investment platforms and discretionary fund managers
- Compliance, paraplanning and administrative support services
- Providers of back-office and financial planning software systems

- Legal advisers and other professional services firms
- Identity verification, credit reference and fraud prevention agencies

We will confirm the specific third parties with whom we share your information when we have identified the products or services we recommend. This will usually be set out in our suitability report.

If we are required to transfer your personal information to parties located outside the United Kingdom or the European Economic Area, we will ensure that appropriate safeguards are in place to protect your information in accordance with applicable UK data protection law.

7. Retention of Your Personal Information

We retain your personal information securely for as long as necessary for the purpose of providing you with financial advice and services, and for as long as we are required to by relevant regulation. FCA rules and other applicable legislation typically require financial advice records to be retained for a minimum period following the advice being given.

Where your personal data is no longer required, we will securely dispose of it in accordance with our data retention policy.

8. Your Privacy Rights

Under UK data protection law you have the following rights in relation to your personal data:

Your Right	What This Means
Right of Access	Request a copy of your personal data. We will normally provide this free of charge within one month.
Right to Rectification	Ask us to correct inaccurate or incomplete personal data held about you.
Right to Erasure	Ask us to delete your personal data where there is no longer a lawful basis for us to hold it. Note that regulatory retention requirements may mean we are unable to delete certain records.
Right to Restriction	Ask us to restrict how we use your personal data while a request for rectification or erasure is being considered.
Right to Portability	Request that certain personal data be provided to you or transferred to another organisation in a structured, commonly used electronic format.
Right to Object	Object to our processing of your personal data where we rely on legitimate interests as our lawful basis.
Right to Withdraw Consent	Where we process personal data on the basis of your consent (including special category data and marketing), you may withdraw that consent at any time without affecting the lawfulness of processing carried out before withdrawal.

To exercise any of these rights, please contact our Data Protection Officer at: Nine Edge Wealth, 19a Hill Street, Edinburgh, Scotland, EH2 3JP. You also have the right to complain to the Information Commissioner's Office (ICO), the UK's data protection regulator, at www.ico.org.uk/global/contact-us.

9. Internet and Electronic Communications

Electronic communications, including email sent over the internet, cannot be guaranteed to be entirely secure. While we take reasonable precautions to protect personal data in transit, we cannot accept liability for loss or damage arising from interception, corruption, delay or non-delivery of electronic communications.

Communications and document exchange may also take place through electronic client portals and secure systems designed to provide enhanced protection for transmitted information. If you prefer not to exchange documents or data electronically, please inform us and we will make alternative arrangements.

10. Special Category Personal Data

The information you provide may include what data protection law refers to as 'special category personal data' — for example, information about your physical or mental health relevant to protection advice or retirement planning decisions.

We will only collect and process special category personal data where it is relevant and strictly necessary for the services we provide, and only with your explicit consent. Where any other type of special category data becomes relevant, we will make you aware and obtain your explicit consent before collecting or using it.

You may withdraw that consent at any time by contacting us at the address shown on this Notice.

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MARKETING PREFERENCES

Your choices matter to us

From time to time, Nine Edge Wealth may wish to send you information about financial planning topics, market updates, service developments, and relevant news that we think may be of interest to you. Under UK GDPR, we require your consent to contact you for marketing purposes.

Please read the options below carefully and tick any boxes where you are happy to be contacted. You may change your preferences at any time by contacting us. If you do not wish to receive any marketing communications, simply leave all boxes unticked — this will not affect the financial advice services we provide to you.

GDPR NOTE *Your consent to receive marketing communications is entirely separate from the consent we require to process your personal data for the purpose of providing financial advice. Leaving all marketing boxes unticked will have no effect whatsoever on the advice and services we provide to you.*

✓	Type	Description — tick to consent
Section A — What We May Send You		
☐	**Financial planning updates**	Newsletters, articles and guides on financial planning topics relevant to your circumstances, produced by Nine Edge Wealth.
☐	**Market and investment commentary**	Periodic updates on investment markets, economic developments and portfolio-relevant commentary.
☐	**Service and proposition updates**	Information about new or updated services offered by Nine Edge Wealth, including any changes to how we can support you.
☐	**Regulatory and legislative updates**	Summaries of relevant changes in tax, pension, or financial regulation that may affect your financial plans.
☐	**Events and seminars**	Invitations to financial planning events, webinars or seminars hosted or supported by Nine Edge Wealth.
Section B — How We May Contact You		
☐	**Email**	I am happy to receive marketing communications by email.
☐	**Post**	I am happy to receive marketing communications by post.
☐	**Telephone**	I am happy to be contacted by telephone for marketing purposes.
Section C — Additional Consent		
☐	**Third-party partner communications**	I am happy for Nine Edge Wealth to share my contact details with carefully selected professional partners (such as accountants or solicitors) for the purpose of sending me relevant financial information. Nine Edge Wealth will not sell your data. Any third party will be required to handle your data in accordance with UK GDPR.

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☐	**Research and feedback**	I am happy to be contacted occasionally for the purpose of client satisfaction research or to provide feedback on services.

Your right to change your mind

You may withdraw or amend your marketing preferences at any time by:

- Emailing to enquiries@nineedge.co.uk
- Writing to us at: Nine Edge Wealth, 19a Hill Street, Edinburgh, Scotland, EH2 3JP
- Clicking the unsubscribe link in any marketing email you receive

Withdrawing your consent will not affect the lawfulness of any marketing communications sent before you withdrew it and will never affect the financial advice services we provide to you.

Please note the following:

- We will never sell your personal data to any third party for marketing purposes.
- Any consent you give here relates only to marketing communications and does not affect our right to contact you in connection with the financial advice and services we provide.
- Where you consent to Section C (third-party partner communications), any third party receiving your details will be required to handle your data in accordance with UK GDPR and will have their own Privacy Notice.
- You can update your preferences at any time by contacting us — there is no minimum period for which consent must be maintained.

Confirmation of Marketing Preferences and Data Protection Consent

By signing below I/we confirm that I/we have read this Data Protection and Privacy Notice, and that the marketing preferences ticked above accurately reflect my/our choices. I/we understand that I/we can change these preferences at any time.

I/We also provide explicit consent for Nine Edge Wealth to process any special category personal data that is relevant and necessary for the provision of financial advice and related services, as described within this Notice. I/We understand that this consent is voluntary and may be withdrawn at any time, although withdrawal of consent may affect the services that can be provided to me/us.

I/We understand that my/our personal data will be processed in accordance with applicable data protection legislation and this Privacy Notice.

Client 1	Signature:	Full Name:	Date:
Client 2 (if applicable)	Signature:	Full Name:	Date:

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