This Privacy Notice ("**Privacy Notice**") sets out how Halesworth & Hurlston Limited ("**H&H**", "**we**" or "**us**") collects, uses, shares, stores, transfers, protects and removes your personal information. We are the controller of the personal information described in this notice, which means we decide how and why it is used.

We respect your right to data privacy and maintain a strict policy of client confidentiality. We are committed to protecting and safeguarding your personal information. As part of this commitment, this Privacy Notice aligns with the UK General Data Protection Regulation ("**UK GDPR**"), the Data Protection Act 2018 and other applicable data protection laws, as amended from time to time, including by the Data (Use and Access) Act 2025 (together, "**Data Protection Laws**"). It relates to all personal information you provide to us and all personal information we hold about you in connection with your use of [our website: www.halesworthandhurlston.com] (the "**Website**") and our services. It supplements, and should be read together with, our Client Care Agreement.

H&H is an appointed representative of Continuum Wealth which is authorised and regulated by the Financial Conduct Authority (FRN 1065296). Continuum Wealth is responsible for the regulated advice we give. It receives and uses some of your information to supervise us and to meet its own legal obligations, and in doing so acts as a separate controller. Its privacy notice is at https://www.continuum-wealth.co.uk/regulatory/important-information.

If you have any questions about this Privacy Notice, you can contact us at: abriggs@halesworthandhurlston.com

This Privacy Notice will help you understand the following:

1. What personal information we collect and where it comes from.
2. How we use your personal information, and our legal basis for doing so.
3. Benchmarking: how we use aggregate data to understand financial life at the Bar.
4. How we disclose your personal information.
5. How we use technology, including AI.
6. Transfers outside the UK.
7. How long we keep your personal information.
8. How we protect your personal information.
9. How we use cookies.
10. Your rights in relation to your personal information.
11. Third-party sites.
12. Information about other people, and about children.
13. Changes to this Privacy Notice.
14. How you can contact us.
15. Complaints.

Please read this Privacy Notice carefully and ensure you understand it before using our Website and services.

1. What personal information we collect and where it comes from

"Personal information" refers to any information that is recorded, electronically or otherwise, that can be used alone or in combination with other information to identify a natural person or reflect the activity of a natural person.

In line with applicable Data Protection Laws, we only collect and use personal information where we have a valid reason to do so, including where you have provided your consent, where we need it to fulfil our contract with you, where we are required to by law or regulation, or where it is necessary for our legitimate interests. Because we provide regulated financial advice, we need to collect a significant amount of information about you. Depending on the service you use, we collect:

- **Identity:** your name, date of birth, National Insurance number and identity documents used for verification.
- **Contact:** your address, email address and telephone number.
- **Professional:** your chambers, year of call, years in practice, practice area, silk status or intention to apply, and fee and clerking arrangements.
- **Financial:** your income and fee history, expenses, tax position, savings, investments, pensions, property, mortgages and other liabilities, insurance cover, and bank transactions if you connect your accounts through open banking.
- **Circumstances:** your age, family and dependants, objectives, attitude to risk, capacity for loss, and knowledge and experience of financial products.
- **Health (special category data):** health information needed for protection advice, or where it is relevant to your planning.
- **Vulnerability:** circumstances that may affect how we should support you, such as bereavement, illness or major life events.
- **Records:** our meeting notes, recordings and transcripts, emails, suitability reports, instructions and your signed documents.
- **Marketing and communications:** your enquiries, event and webinar attendance, survey responses and communication preferences.
- **Technical and usage:** your IP address, device and browser type, referral source, pages viewed, and the timing and frequency of your visits, collected through analytics tools and cookies (see section 9). We use this only to improve our Website and services.

We collect this information mainly from you. We may also receive it from your accountant or chambers where you ask us to liaise with them; from platform, pension and product providers; from HMRC or your bank where you authorise us to access it; and from identity verification services.

2. How we use your personal information, and our legal basis

We will not use your personal information except as set out in this Privacy Notice. If you register as a client with us, this table shows how we use it:

Purpose / use	Type of data	Legal basis
To register you as a new client, verify your identity and carry out anti-money laundering checks.	Identity, Contact, Professional	Performance of contract with you (including steps before entering into it). Necessary to comply with a legal obligation.
To provide our advice and services, including the fact-find, suitability assessment, reports, implementation of recommendations, reviews and ongoing service.	Identity, Contact, Professional, Financial, Circumstances, Records	Performance of contract with you. Necessary to comply with a legal obligation (FCA rules, including suitability and Consumer Duty).
To arrange products and transactions with platforms, pension providers, insurers and lenders on your behalf.	Identity, Contact, Financial, Circumstances	Performance of contract with you.
To manage payments, fees and charges, and to collect and recover money owed to us.	Identity, Contact, Financial	Performance of contract with you. Necessary for our legitimate interests (to recover debts due to us).
To process health information for protection advice and, where relevant, to plan around it.	Health, Circumstances, Financial	Your explicit consent. You can withdraw it at any time, but this may limit the advice we can give.
To identify clients in vulnerable circumstances and adapt our service to support them.	Vulnerability, Health, Circumstances	Necessary to comply with a legal obligation (FCA Consumer Duty). Your explicit consent where health data is involved.
To record, transcribe and summarise meetings so that our advice records are accurate and complete.	Records, Identity	Performance of contract with you. Necessary to comply with a legal obligation (record-keeping). Necessary for our legitimate interests (accuracy and quality of service).
To meet our regulatory obligations, including supervision by, and reporting to, our principal firm and the FCA.	All data types as relevant	Necessary to comply with a legal obligation. Necessary for our legitimate interests (our principal firm's oversight of our business).
To handle complaints, defend or bring legal claims, and manage risk and insurance.	All data types as relevant	Necessary for our legitimate interests. Necessary to comply with a legal obligation.
To administer and protect our business and Website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data), to prevent fraud, and in the context of a business reorganisation or restructuring.	Identity, Contact, Technical and usage	Necessary for our legitimate interests (running our business, IT and network security, preventing fraud). Necessary to comply with a legal obligation.

Purpose / use	Type of data	Legal basis
To create anonymous, aggregate benchmarks (see section 3).	Professional (chambers, years in practice, practice area), Circumstances (age band), Financial	Necessary for our legitimate interests. You can opt out or object at any time.
To use data analytics to improve our Website, services, client relationships and experiences, and to measure the effectiveness of our communications.	Technical and usage, Marketing and communications	Necessary for our legitimate interests (to keep our website and services relevant and develop our business). Your consent for non-essential cookies.
To invite you to events and webinars and send you newsletters and updates.	Identity, Contact, Marketing and communications	Your consent. Necessary for our legitimate interests where you are an existing client and we are writing about similar services; you can opt out at any time.
To carry out market research through your voluntary participation in surveys.	Identity, Contact, Marketing and communications	Necessary for our legitimate interests (to study how clients use our services and to help us improve and develop them).

3. Benchmarking: using aggregate data to understand financial life at the Bar

Because we work only with barristers, we can learn what financial life at the Bar looks like in practice; how income varies by career stage, how much barristers typically save into pensions, where protection gaps appear and share that knowledge back with the profession. We do this by building anonymous, aggregate benchmarks from our clients' information.

What we use

- Your chambers.
- Your age, held as an age band.
- Your years in practice or year of call, held as a band where possible.
- Your practice area.
- Financial information such as income, expenses, savings, pension contributions, protection cover and liabilities, held as ranges or ratios where possible.

What we never use

Your name, contact details, National Insurance number or other identifiers; health or other special category data; your adviser's notes; and your meeting recordings or transcripts.

How it works

- We copy the fields listed above into a separate benchmarking dataset, remove your direct identifiers and replace them with a random code.
- The key linking that code back to you is held separately. Access to the dataset and to the key is restricted to named staff who need it.
- Only aggregated results ever leave the dataset. We do not share or publish individual records, and we do not try to work out who anyone is.

Protections specific to a small profession

The Bar is a small and closely connected profession, so details like chambers, year of call and practice area could point to an individual if combined carelessly. We therefore:

- do not publish any figure that names a chambers unless that chambers has agreed to it; and
- review our results before release to check that no individual could reasonably be identified from them, taking into account what others at the Bar may already know.

Why we do this, and how we balance it

Our interests are to improve the advice we give barristers, to build more accurate planning assumptions for the profession, and to produce useful research and educational content for the Bar. Creating the benchmarking dataset is itself a use of your personal information. We have assessed that it is necessary for these purposes, that it uses the minimum information required, and that the safeguards above keep the impact on you low. Our assessment is available on request.

How the results are used

- Inside H&H, to shape our services and planning assumptions.
- In published reports, articles, talks and courses for the Bar, in anonymous aggregate form.
- We may share anonymous aggregate results (never individual records) with third parties such as professional bodies, publishers or research partners, and may charge for access.

We will never sell your personal information.

Your choice

Taking part is not a condition of becoming or remaining a client. You can opt out when you onboard, or at any time afterwards, by emailing abriggs@halesworthandhurlston.com. If you do, we will remove your record from the benchmarking dataset and exclude it from all future benchmarks. Results already published are anonymous and cannot be traced back to you, so they cannot be changed. You also have the right to object to this use of your information (see section 10).

4. How we disclose your personal information

We do not sell your personal information. We disclose it only where there is a good reason, which includes:

- **Our principal firm,** Continuum Wealth, for supervision, compliance monitoring and regulatory reporting.
- **Product and platform providers:** investment platforms, pension providers, insurers and lenders, where we arrange products on your behalf.
- **Introductions you ask for:** specialist brokers or other professionals, such as mortgage brokers, to whom you ask us to introduce you. We will discuss any introduction with you first, and tell you if we would receive a fee.
- **Your other advisers:** your accountant or solicitor, where you ask us to liaise with them.
- **Our professional advisers, auditors and insurers.**
- **Regulators and authorities:** the FCA, the Financial Ombudsman Service, HMRC, the National Crime Agency, law enforcement and others, where we are required to by law or regulation.

Other than as set out in this Privacy Notice, we will keep your personal information confidential and will not disclose it to anyone else unless you ask us to or we are required to by law.

Third-party service providers

We use third-party software and services to run the firm and deliver our service, such as CRM and planning software (e.g. Intelligent Office and FE Analytics), Microsoft 365, document-signing, video-conferencing, transcription, payment and cloud storage providers, and identity verification

services. They act only on our instructions under written contracts and are subject to a duty of confidentiality.

We also use a third-party newsletter email service. We may share your contact details with it so that it can send you newsletters if you have agreed to receive them.

- Our newsletters use tracking so that we can see whether an email has been opened and which links were clicked. We send newsletters, and use this tracking, only where you have agreed to receive them or where you are an existing client and we are writing about similar services. This includes details of events, webinars and updates for individuals who have subscribed via our Website or are registered clients.
- You can unsubscribe at any time by clicking the unsubscribe link at the bottom of each email.

5. How we use technology, including AI

We use secure software to run the firm, including tools that transcribe meetings, summarise notes and help draft documents. We tell you at the start of any meeting we record, and you can ask us not to.

- Your adviser reviews and approves everything these tools produce before it is placed on your file or sent to you.
- Our suppliers act only on our instructions
- Your information is not used to train the suppliers' AI models
- We do not make decisions that have a legal or similarly significant effect on you based solely on automated processing.

6. Transfers outside the UK

We aim to keep your personal information in the UK. If a supplier processes it elsewhere, we make sure it is protected by an adequacy decision or by approved contractual safeguards, such as the International Data Transfer Agreement or the UK Addendum to the EU Standard Contractual Clauses. Please ask us if you would like further details.

7. How long we keep your personal information

Information	How long we keep it
Client files and advice records	For the life of our relationship and at least five years afterwards; indefinitely for pension transfer and pension opt-out advice
Identity and anti-money laundering records	Five years after our relationship ends.
Meeting recordings and transcripts	At least five years.
Complaints records	Five years from resolution.
Enquiries from people who do not become clients	12 months from last contact.
Marketing preferences	Until you opt out. We keep a minimal suppression record so that we do not contact you again.

Information	How long we keep it
Benchmarking dataset (pseudonymised)	While you are a client and for up to five years afterwards, so that benchmarks reflect career-long trends; reviewed at least every year. Removed sooner if you opt out. Anonymous aggregate results are kept indefinitely because they no longer relate to any individual.

When retention periods end, we securely delete or anonymise the information.

8. How we protect your personal information

We take appropriate administrative, physical and technical measures to safeguard your personal information from unauthorised access, collection, use, disclosure, copying, modification, disposal or similar risks, and from the loss of any storage medium or device on which it is held. These include encryption, access controls, secure document exchange rather than ordinary email attachments, staff training and supplier due diligence. We limit access to your personal information to those who have a business need to know. They will only process it on our instructions, and they are subject to a duty of confidentiality.

You should be aware, however, that no method of transmission over the Internet or method of electronic storage is entirely secure. While security cannot be guaranteed, we strive to protect your personal information and are constantly reviewing and enhancing our security measures.

If your personal information is subject to any unauthorised disclosure or access, or any other data breach (a "**Data Breach Incident**"), we will, without undue delay and in accordance with Data Protection Laws, tell you where the breach is likely to result in a high risk to you. We will explain what has happened, the possible impacts, the measures we have taken or will take, and what you can do to protect yourself. We will contact you by email or telephone, or by public notice where individual contact is not practical. We will also report the incident to the ICO where required.

9. How we use cookies

A cookie is a piece of information that web servers send to your browser when you access a website. When you return to the website, it can detect whether you have a cookie on your browser. We issue session cookies only where strictly necessary for the operation of the Website. These do not hold any personal information.

For further information visit http://www.allaboutcookies.org/

You can set your browser not to accept cookies, and the above website tells you how to remove cookies from your browser. However, in a few cases some of our website features may not function as a result.

10. Your rights in relation to your personal information

At any point while we are in possession of or processing your personal information, you, as the data subject, have the following rights:

- **Right of access** — You have the right to request a copy of the personal information that we hold about you.
- **Right of rectification** — You have the right to correct personal information that we hold about you that is inaccurate or incomplete.
- **Right to erasure** — You have the right to ask us to delete your personal information in certain circumstances, for example where it is no longer necessary for the purpose we

collected it, where you withdraw consent, or where we have no lawful basis to keep it. We may need to keep some records in order to meet FCA rules and other legal obligations, and will tell you if so.

- **Right to restrict processing** — You have the right to ask us to limit how we use your information in certain circumstances, for example while we check its accuracy.
- **Right to object** — You have the right to object to processing based on legitimate interests, including our use of your information for benchmarking (section 3), and to direct marketing at any time. We will stop unless we can show compelling legitimate grounds that override your interests, or we need the information for legal claims. Objections to direct marketing are always honoured.
- **Right to data portability** — You have the right to receive, move, copy or transfer your personal information for your own purposes across different services (for example, from us to another adviser), where we use it under a contract or your consent.
- **Rights relating to automated decisions** — You have the right not to be subject to a decision based solely on automated processing that has a legal or similarly significant effect on you. We do not make such decisions.
- **Right to change the scope of consent or withdraw consent** — You have the right to change or withdraw your consent at any time. This will not affect the lawfulness of any processing carried out before you withdraw it. If you withdraw consent, we may not be able to provide certain services to you, and we will advise you if this is the case at the time.

Please contact abriggs@halesworthandhurlston.com if you would like to exercise any of these rights. For security reasons, we may ask you to verify your identity before handling your request. We will generally reply within one month of receiving your request and verifying your identity. If your request is complex or you have made several requests, we may take up to two further months, and we will tell you if so.

You will not have to pay a fee to access your personal information (or to exercise any of your other rights). However, we may charge a reasonable fee, or refuse to act, if your request is manifestly unfounded or excessive.

In some circumstances we may be unable to fully comply with a request — for example, where the law or FCA rules require us to keep the information, where complying would reveal information about another person, or where an exemption under Data Protection Laws applies, such as legal professional privilege. If so, we will explain why.

11. Third-party sites

The Website may occasionally contain links to other websites, such as professional bodies, our principal firm or other third parties. Certain features of our service may also be provided through third parties, such as your platform provider's client portal, a secure document-signing service or a video-conferencing provider. When you access or use such services, or click a link to a third-party website, your personal information may be collected directly by that third party.

Those websites and services are not owned or operated by us, and each is responsible as a separate controller for how it handles your personal information. Please read the privacy policies that apply to them before you provide personal information. Where we ask you to use a third-party service as part of our own, we will tell you who they are, and we select them carefully.

12. Information about other people, and about children

To give you suitable advice we may need information about other people for example your partner, dependants, or beneficiaries. Please share only what is needed, and make sure those people know

that you are giving it to us. We use it only to provide advice to you, and we treat it with the same care as your own information.

A child is any person below the age of 18. We may need to record information about your children to advise you on matters such as school fees, trusts, savings and protection. We use it only for that purpose. We do not provide services directly to anyone under the age of 18, and if we discover that we have collected a child's information without a parent's or guardian's involvement, we will delete it as soon as possible.

13. Changes to this Privacy Notice

The terms of this Privacy Notice may be revised from time to time. We will use reasonable methods to tell you about revisions, such as posting a revised version on our Website or emailing you if you have provided your email address. We will tell you directly about any significant change, in particular any change to how we use information for benchmarking. This Privacy Notice was last updated on the date set out below.

14. Contact

If you have any questions about our use of your personal information or this Privacy Notice, please get in touch with us at: abriggs@halesworthandhurlston.com

15. Complaints

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK regulator for data protection issues (www.ico.org.uk, telephone 0303 123 1113). We would, however, appreciate the chance to deal with your concerns before you approach the ICO, so please get in touch with us in the first instance: abriggs@halesworthandhurlston.com

This Privacy Notice was last updated on: 12 October 2026