DowgateWealth

Privacy Notice

July 2026

DOWGATE WEALTH LIMITED

PRIVACY NOTICE

1 About this notice

This notice (the "Privacy Notice") provides information about how Dowgate Wealth Limited ("we", "us", "our") gathers and uses personal information of its clients and potential clients ("you") in accordance with the UK General Data Protection Regulation as retained in UK law by the European Union (Withdrawal) Act 2018 and as amended by the Data Protection, Privacy and Electronic Communications (Amendments etc.) (EU Exit) Regulations 2019 ("UK GDPR") and any other applicable data protection and privacy laws in the United Kingdom (collectively, the "Data Protection Laws"). Dowgate Wealth Limited (registered number 12221221), having its registered office at 15 Fetter Lane, London, EC4A 1BW, is the "controller" of your personal data for the purposes of the Data Protection Laws. Should you have any questions or concerns about this Privacy Notice or the processing of personal data we hold about you, please contact us at compliance@dowgate.co.uk or by calling +44 020 3416 9143.

We are committed to respecting the confidentiality of the personal information you supply to us and all data will be processed in accordance with this Privacy Notice and applicable Data Protection Laws.

You have the right to be provided with clear, transparent and easily understandable information about how we use your information and your rights. This is why we are providing you with the information in this Privacy Notice. If you do not agree with our use of your personal data as set out in this Privacy Notice, you should not submit your personal information to us. However, if you do not wish to submit your personal information, or if you wish to exercise your rights to prevent us using your data, you should be aware that we may not be able to do business with you.

2 Your rights

Under certain circumstances, in accordance with the Data Protection Laws, you have the right to:

- Object to processing of your personal information where we are relying on a legitimate interest (or that of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- Request access to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are processing it lawfully.
- Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- Request erasure of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see above).
- Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- Request the transfer of your personal information to another controller in a machine-readable, commonly used and structured format.

If you want to exercise any of these rights then please contact us using the details at section 1. The various rights are not absolute and each is subject to certain exceptions or qualifications. For example, if you wish to withdraw your consent or object to processing, we may need to

discuss with you whether our use of your data needs to continue for other lawful purposes, such as fulfilment of a legal or contractual requirement.

We will respond to your request within one month of receipt of your request. In some cases we may not be able to fulfil your request to exercise the right before this date, and may need to request more time. Where we cannot provide a full response to you for any reason, we will let you know about this in our initial reply to your request.

2.1 Your duty to inform us of changes

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your working relationship with us.

2.2 Fees

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). In some cases, we may charge a reasonable fee if your request for access is clearly unfounded or excessive, or if you request multiple copies of the information. Alternatively, we may refuse to comply with the request in such circumstances.

2.3 What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

2.4 Right to complain

If you wish to request further information about any of the above rights, or if you are unhappy with how we have handled your information, please contact us using the contact details contained in section 1. If you are not satisfied with our response to your complaint or the exercise of your rights as a data subject, or if you believe our processing of your information does not comply with Data Protection Laws, you can make a complaint to the relevant data protection authority. In the UK, you can contact the Information Commissioner's Office ("ICO") at https://ico.org.uk/global/contact-us/ or by calling 0303 123 1113.

3 Information we collect

We may collect and process the following information about you:

Data	Description
Identity Data	First name, last name, any previous names, username or similar identifier, marital status, title, date of birth and gender.
Contact Data	Billing address, delivery address, email address and telephone numbers.
Financial Data	Bank account and payment card details, details of assets or income.
Profile Data	Your username and password, purchases or orders made by you, your interests, preferences, feedback, and survey responses.

Usage Data	Information about how you interact with and use our website, products, and services.
Due Diligence Data	Includes data we are required to collect in order to comply with KYC, AML or other regulatory or internal policy requirements, such as without being limited to social security number, tax or other national identification number, date and place of birth, nationality, gender, passport and ID numbers. In limited circumstances, such data may include Special Categories of Personal Data which includes genetic and biometric data that may be included in your Passport or other forms of identification.
Marketing and Communications Data	Your preferences in receiving marketing from us and our third parties and your communication preferences.
Communication Data	Records of communications with you, including telephone calls, voicemails, video meetings, emails, instant messages, correspondence, meeting notes and other communications relating to our relationship with you. Telephone calls and virtual meetings may be recorded where permitted by law.
Call Analysis and Compliance Data	Information generated through the review and analysis of recorded communications, including AI-assisted analysis, such as call summaries, transcripts, quality assurance outcomes, customer vulnerability indicators, complaint identification, conduct monitoring, anti-money laundering (AML) indicators, fraud detection, market abuse monitoring, financial crime indicators and regulatory compliance information.
Regulatory Monitoring Data	Information generated through regulatory and quality assurance monitoring of communications, including assessments relating to Consumer Duty, suitability, appropriateness, knowledge and experience, customer understanding, vulnerability, complaint indicators, adviser conduct, service quality and regulatory compliance.

We will collect some of this information directly from you (for example, where we correspond with you, communicate by telephone or video conference, or when you use our services). Other information may be collected from third parties, service providers, public registries in respect of AML or KYC requirements, publicly available sources such as Companies House, or generated through our internal systems and AI-assisted monitoring and analysis tools.

4 How we use the information we collect

4.1 General uses of information

The information which we collect and what we use it for will depend on the nature of our business relationship with you. We use your information:

- To perform our contractual obligations in respect of a contract we have previously or are about to enter into with you;
- To comply with legal and regulatory obligations; and
- For our legitimate interests where it is necessary in ensuring we provide professional and accurate services, the improvement of our services, and the development of our business, provided that your interests and fundamental rights do not override those interests.
- We may record, monitor and analyse communications with you, including telephone calls and virtual meetings, where permitted by law. These recordings may be used to:
- comply with legal and regulatory obligations;

1. verify instructions and transactions;
2. maintain accurate records;
3. investigate complaints or disputes;
4. identify and support potentially vulnerable customers;
5. detect and prevent fraud, money laundering, market abuse and other financial crime;
6. monitor the quality of our services;
7. train and supervise our employees; and
8. improve our operational processes and regulatory oversight.

Where appropriate, we may use artificial intelligence ("AI") and other automated technologies to assist in reviewing and analysing communications. These technologies may generate transcripts and summaries and assist us in monitoring compliance with legal and regulatory requirements, including the FCA's Consumer Duty, assessing the suitability and appropriateness of advice, identifying customer vulnerability, monitoring adviser conduct and competency, reviewing the quality and clarity of client communications, identifying complaints or dissatisfaction, supporting anti-money laundering and financial crime monitoring, detecting potential market abuse indicators, monitoring financial promotions and communication standards, and improving the quality, consistency and efficiency of our services. AI-assisted processing supports our employees and compliance teams and does not replace appropriate human oversight where required.

4.2 Information for marketing purposes

We use your information to identify products, services and events that we think may be of interest to you.

We will only send you marketing messages where you have consented to such contact via the application form, or in the case of products and services, where these are similar to those that we have already provided to you.

You have the right to ask us at any time to not send you marketing messages by contacting us using the details in Section 1, and we will cease to send you such communications as mentioned above.

5 Our bases for collecting and using the information

We are entitled to use your personal data in the ways set out in this Privacy Notice on the following bases:

Type of data	Purpose	Lawful basis for processing, including basis of legitimate interest
Identity Data Contact Data Profile Data Marketing and Communications Data	To manage our relationship with you	For the performance of a contract we have entered into with you. To comply with a legal obligation. For our legitimate interests in ensuring we provide professional and accurate services and the

		improvement of our services and development of our business.
Identity Data Contact Data Financial Data Due Diligence Data	To register you as a customer, including the opening and managing of your investment accounts	For the performance of a contract we have entered into with you. To comply with a legal obligation.
Identity Data Contact Data Financial Data Due Diligence Data	Monitoring investment accounts for financial crime prevention (e.g., fraud, money laundering)	To comply with a legal obligation.
Identity Data Contact Data Usage Data Profile Data Marketing and Communications Data	To send you relevant marketing communications and make personalised suggestions and recommendations to you about goods or services that may be of interest to you	Necessary for our legitimate interests, to carry out direct marketing, develop our products/services and grow our business. Consent, having obtained your prior consent to receiving direct marketing communications.
Usage Data Profile Data	Analysing how clients use the website, products, and services, improving website functionality	Necessary for our legitimate interests, to improve website, products, and services, and to enhance user experience
Identity Data Contact Data Financial Data Due Diligence Data	Recording, monitoring and analysing communications for regulatory compliance, complaint handling, quality assurance, vulnerability monitoring, fraud prevention, AML, financial crime prevention and market abuse detection	Necessary to comply with our legal and regulatory obligations. Necessary for our legitimate interests in protecting clients, preventing financial crime, maintaining service quality and meeting regulatory expectations.

If provision of your personal information is a legal or contractual requirement or a requirement necessary to enter into a contract with us, and you choose not to provide it, we may not be able to perform some of the tasks we need to in order to provide certain products or services to you.

If you do choose to provide your consent you can withdraw it at any time by contacting us (see section 1).

6 Sharing your information

We may share your personal data internally within our group, specifically between Dowgate Wealth Limited and Dowgate Capital Limited. This is due to historical and operational reasons,

as some client data is currently held within Dowgate Wealth Limited's systems (such as on our Tercero platform) including where the client relationship is managed by Dowgate Capital Limited. As a result, client data may be accessed and used by both entities for the same purposes already outlined in this Privacy Notice, namely to manage and service your relationship with us, fulfil our contractual and regulatory obligations, and for other legitimate business interests as described. We may also share your personal data with our parent company, Dowgate Group Limited due to group governance processes, which involves the oversight of certain operations of Dowgate Wealth Limited. If you have a relationship with either Dowgate Capital Limited or Dowgate Group Limited, they will be controllers of your personal data in the context of that relationship and you can find their privacy notices here:
https://dowgatecapital.co.uk/privacy-statement/
https://dowgategroup.co.uk/privacy-notice/

We will not disclose your personal information to third parties except as detailed in this Privacy Notice.

Where necessary, we disclose your personal data to third parties that are specifically engaged by us to provide services to us, in which case we require those parties to keep that information confidential and secure and to use it solely for the purpose of providing the specified services to us. The following is a list of the types of third parties who process your personal data on our behalf:

- Titan, our custody and client money provider, who we have appointed to process data on our behalf in order to allow us to provide products or services that you have requested.

- Our client relationship management (CRM) provider, Evorio, whose platform we use to manage client relationships and may share relevant information with them.

Aveni Limited, AI-powered communication monitoring and quality assurance services, including secure transcription, summarisation and analysis of telephone calls and other communications to assist with regulatory compliance, Consumer Duty monitoring, vulnerability identification, complaint handling, suitability reviews, adviser supervision, quality assurance, conduct risk monitoring, anti-money laundering, fraud prevention, market abuse monitoring and operational reporting. AI-generated summaries, transcripts, alerts and recommendations are used to support our employees and compliance teams and remain subject to appropriate human review and oversight. AI-assisted processing supports management information, compliance reporting and operational oversight to help us meet our regulatory obligations.

S**eptima (Kycel Inc.)** – provider of our bespoke AI-enabled internal dashboard, workflow and data integration platform. Septima assists us with securely integrating data across our internal systems, workflow automation, operational reporting, management information, document management and AI-assisted analysis to support the delivery of our services and our regulatory obligations. Where personal data is processed on our behalf, Septima acts as our data processor under appropriate contractual safeguards. AI outputs are assistive only, remain subject to appropriate human oversight and your personal data is not used to train public or shared AI models

- External and internal auditors (providers may change from time to time) may be given access to your information for audit and compliance purposes.

- Professional advisers, where necessary, including accountants, compliance consultants, and legal advisers, in connection with the services they provide to us.

- Law enforcement agencies, government departments, or other competent authorities in the UK or other countries where we are under a duty to disclose or share your information in order to comply with any legal or regulatory obligation, or if we reasonably consider that this is necessary to help prevent or detect fraud or other crime, or to protect our rights,

property, or safety, or that of our customers or others. Such disclosure may be made directly to such regulators or competent authorities or made indirectly to our advisers or providers who will make such filings or disclosures on our behalf.

- If we are under a duty to disclose or share your information with HM Revenue & Customs (HMRC) or other tax authorities, we may do so. These authorities may transfer your information to the government or tax authorities in another country where you may be subject to tax. Such disclosure may be made directly to such regulators or competent authorities or made indirectly to our advisers or providers who will make such filings or disclosures on our behalf.

We may also disclose your personal information to a third party where you have consented to us doing so.

7 Where we store your information

We do not currently transfer, use, or store your personal information outside of the European Economic Area ("EEA") or the UK. In the future, it may become necessary to transfer your personal information internationally, for example, if one of our suppliers is located outside the EEA or the UK. Please note that the laws in some of these countries may not provide the same level of protection for personal information. Any transfers to third-party service providers would be solely for the purpose of enabling them to use and store your personal information on our behalf.

Should we need to transfer your personal information outside the EEA or the UK, we will update this Privacy Notice to inform you of any changes regarding such transfers. We will also ensure that appropriate security measures are in place to protect your information, and any transfers will only occur using specific, legally approved safeguards.

8 Keeping your information

We will keep your information only for as long as necessary depending on the purpose for which it was provided. Details of how long we retain different categories of your personal information are available on request. If you would like further information, please contact our Compliance team at Compliance@dowgate.co.uk.

When determining the relevant retention periods, we will take into account factors including:

- our contractual and business relationships with you;
- legal obligations under applicable law to retain data for a certain period of time;
- statute of limitations under applicable law(s);
- (potential) disputes; and
- guidelines issued by relevant supervisory authorities.

9 Security

We acknowledge that the information you provide may be confidential and will maintain the confidentiality of and protect your information in accordance with our normal procedures and all applicable laws. We employ appropriate technical and organisational security measures to help protect your personal data against loss and to guard against access by unauthorised persons. We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

In addition, those employees, agents, contractors and other third parties who process your personal data will only do so on our instructions and they will be subject to a duty of confidentiality.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our website. Any transmission is at your own risk. Once we have received your information, we will use procedures and security features to try to prevent unauthorised access.

We undertake due diligence on all third-party processors that handle personal data on our behalf, including providers of AI-enabled services. Such providers are required to implement appropriate technical and organisational security measures and are contractually prohibited from using personal data for their own purposes unless they are acting as an independent controller and this has been clearly communicated to you. We regularly assess the performance and accuracy of AI-assisted tools, monitor them for bias or unintended outcomes where appropriate, and ensure that appropriately trained employees review outputs before they are relied upon for regulatory or business purposes.

10 Artificial Intelligence

We may use artificial intelligence ("AI"), machine learning and other advanced data analytic technologies to support the delivery of our services and our regulatory obligations. Communication recordings, transcripts and AI-generated summaries are retained in accordance with regulatory requirements and applicable regulatory record-keeping requirements.

These technologies may assist with:

- transcription and summarisation of communications;
- quality assurance;
- customer vulnerability identification;
- complaint identification and management;
- anti-money laundering and financial crime monitoring;
- market abuse monitoring;
- conduct and regulatory compliance monitoring;
- workflow automation;
- document management; and
- improving the efficiency and accuracy of our internal processes.

AI technologies are used to assist our employees and compliance teams and are subject to appropriate human oversight where required. Where AI-assisted tools are used, appropriately trained employees review the outputs before they are relied upon where required. AI is used to support human decision-making and does not replace professional judgement. We do not make decisions that produce legal or similarly significant effects concerning you based solely on automated processing unless permitted by law or with your explicit consent where required.

We require providers of AI services acting on our behalf to comply with UK data protection legislation, maintain appropriate security standards and process personal data only in accordance with our documented instructions.

Where AI service providers process personal data on our behalf, they are contractually prohibited from using your personal data to train or improve their own general-purpose AI models unless we have specifically informed you otherwise and there is a lawful basis for such processing.

11 Changes to our Privacy Notice

We reserve the right, at our discretion, to change, modify, add to, or remove portions from, our Privacy Notice. We will of course notify you of any changes where we are required to do so.