

Regulatory Documentation Amendments (minor)

Section 24 of our Terms & Conditions states that the governing rules from our regulatory body, the FCA, are subject to continual change, sometimes requiring amendments to our terms and conditions of business. We may change these terms at any time and you agree to accept from us reasonable one way amendments to these agreements which are necessary for compliance with the rules. We may notify you of a change by email, in writing or we may place a notice on our website. Where we make a major change we will provide you with revised terms and conditions. No amendment will affect any outstanding transaction or any rights or obligations that may already have arisen.

The below is a running list of amendments to our Terms & Conditions of Business and other regulatory documentation. Our current Terms & Conditions are dated 2024 and a full copy is available on the website.

10/08/2018

Document: Privacy Notice

Section: 4 How we collect and use personal data

Amendment: Additional text and insert of link to Privacy Notice of third party credit reference agency.

04/03/2019

Document: Privacy Notice

Section: 4 How we collect and use personal data

Amendment: new link to credit reference agency's privacy notice.

30/09/20

Document: Terms & Conditions

Section: 12 Charges

Amendment: Additional text that we charge fees for discretionary management and advisory and ISA services on all assets held, including cash. This is no change to previous practice but explicitly references that cash is an asset.

30/09/20

Document: Terms & Conditions

Section: 16 Nominee Clients – Protection of Client Money/Assets

Amendment: New text for inclusion of Segregated accounts in CREST and default of pooled account.

2021

Document: Conflicts of Interest Policy

Section: Gifts, Hospitality and other Inducements

Amendment: gifts or hospitality exceeding £50 in value is recorded in a register to ensure that they do not influence strategic decision making.

2023

Documents: Terms & Conditions, Privacy Policy, Engagement Policy, Order Execution Policy

These documents were reviewed and updated as part of the Consumer Duty Implementation Plan.

2024

Document: Terms & Conditions

Section: 11 Our charges

Amendment: exclusion of cash from the custody charge.

Text: We will levy a custody charge for our Discretionary and Advisory portfolio management services, our Custody Plus service, and our Advisory Dealing service on all assets held in our nominee, excluding cash. The custody charge is not subject to VAT.

2024

Document: Terms & Conditions

Section: 22 Privacy and data protection

Amendment: processing of Special Category Data.

Text: We are permitted to process Special Category Data without your consent in so far as it is necessary for us to discharge our regulatory obligations in respect of vulnerable customers.

2024

Document: Terms & Conditions

Section: 15 Looking after your assets and money

Amendment: revised text removing association with the Lloyds Bank base rate.

Text: We will pay interest on any credit balances held with us at a rate of 1% below the Lloyds Bank rate paid to the Firm. Interest is calculated daily and credited every three months in arrears. Interest earned is credited gross.

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