

US Privacy Policy

DAVID JAMES WEALTH
USA

WHO WE ARE

At David James Wealth USA, we respect your privacy and the confidentiality of your personal information.

David James Wealth USA is a marketing name of Blacktower Financial Management (US) LLC which is a registered investment adviser with the Securities and Exchange Commission (SEC File# 801-111088). View our full [compliance disclosure](#) here.

Additional information about Blacktower Financial Management (US) LLC is also available on the SEC's website at www.adviserinfo.sec.gov.

Registration as an investment adviser does not imply a certain level of skill or training and does not imply any state or federal regulatory authority has approved or passed upon the advice or services. David James Wealth USA provides financial planning solutions and advice through experienced and qualified advisers based in the UK. Currently, David James Wealth USA and Blacktower Financial Management (US) LLC jointly determine the purposes and means of processing personal client data relating to giving advice. This means we are joint data controllers for these core advice-giving activities and therefore responsible for managing this client data and ensuring compliance. However, David James Wealth USA is solely responsible for some activities, for example, any direct marketing that we undertake.

We will comply with relevant data protection law. Such laws require that the personal information we hold about you must be:

- Used lawfully, fairly, and in a transparent way;
- Collected only for valid purposes that we have clearly explained to you;
- Relevant to the purposes we have told you about and limited only to those purposes;
- Accurate and kept up to date;
- Kept only for so long as necessary for the purposes we have told you about; and
- Kept securely.

YOUR RIGHTS

We try to be as open as we can be in terms of giving people access to their personal information and therefore have outlined your rights below.

You have the right to ask us:

- whether we are processing your personal information and the purposes (the right to be informed) – this is delivered through 'fair processing information' such as this Privacy Notice;
- for a copy of the personal information that we hold about you (the right of access);
- to update or correct your personal information (the right to rectification);
- to delete your information (the right to erasure); and
- to restrict processing of your personal information where appropriate (the right to restrict processing).

In certain circumstances you also have the right to: -

- object to the processing of your personal information (the right to object);
- object to automated decision making and profiling (the right not to be subject to automated decision-making including profiling); and
- request that information about you is provided to a third party in a commonly used, machine readable form (the right to data portability).

Investment Advisers are required by law to inform their clients of their policies regarding privacy of client information. We are bound by professional standards of confidentiality, as part of our compliance with the provisions of certain privacy regulations issued by the United State federal government. We are required to inform you on how we collect, share and protect your personal information.

TYPES OF NONPUBLIC PERSONAL INFORMATION (NPI) WE COLLECT

We collect nonpublic personal information about you that is either provided to us by you or obtained by us with your authorization (such as information on applications). This can include but is not limited to your Social Security Number, Date of Birth, Banking Information, Financial Account Numbers and/or Balances, Sources of Income, Asset(s) Details and Liability Information. When you are no longer our customer, we may continue to share your information only as described in this notice.

PARTIES TO WHOM WE DISCLOSE INFORMATION

All Investment Advisers may need to share personal information to run their everyday business. We restrict access to non-public personal information about you to our employees, affiliates and service providers who need to know that information in order to provide products and services to you. We have not and will not sell your non-public personal information to anyone, even if our formal relationship ends. We do not disclose any non-public personal information about our clients or former clients to anyone, except to our employees, affiliates and services providers and as permitted by law and in accordance with any applicable investment management agreements.

PROTECTING THE CONFIDENTIALITY OF CURRENT AND FORMER CLIENT'S INFORMATION

To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. We maintain physical, electronic and procedural safeguards that we believe are reasonably designed to guard your non-public personal information while it is within our control.

FEDERAL LAW GIVES YOU THE RIGHT TO LIMIT SHARING – OPTING OUT

Federal law allows you the right to limit the sharing of your NPI by “opting-out” of the following: sharing for non-affiliates’ everyday business purposes – information about your creditworthiness; or sharing with affiliates or non-affiliates who use your information to market to you. State laws and individual companies may give you additional rights to limit sharing. Please notify us immediately if you choose to opt out of these types of sharing.

DEFINITIONS

Affiliates – companies related by common ownership or control. They can be financial and non-financial companies; Non-affiliates – companies not related by common ownership or control. They can be financial and non-financial companies; Joint marketing – a formal agreement between non-affiliated financial companies that together market financial products or services to you.

Please call if you have any questions. Your privacy, our professional ethics, and the ability to provide you with quality financial services are very important to us.

Third Party Links

This website may include links to third party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. The privacy policies of others may differ significantly from our Privacy Policy. Therefore, we encourage you to read the privacy statement/policy of each and every website you visit.

Review of this Privacy Policy

We may make changes to this Privacy Policy from time to time. We encourage you to review the Privacy Policy whenever you access or use our website to stay informed about our information practices and the choices available to you. If you do not agree to the revised Privacy Policy, you should discontinue your use of this website.