



Mia Wealth

Privacy and Cookies Policy

Last updated: 13 March 2026.

1. Introduction

- 1.1 We're Mia Wealth Limited, a company registered in England and Wales under company number 15818371 our registered office is Regus House C/O Forty Two Consulting Ltd, Fairbourne Drive, Atterbury Lakes, Milton Keynes, England, MK10 9RG (**we, us** or **our**). We are the controller responsible for your personal data.
- 1.2 We're an appointed representative of RiskSave Technologies Ltd, a company registered in England and Wales under company number 09930262 with its registered office at 2 Eastbourne Terrace, London W2 6LG who are authorised and regulated by the Financial Conduct Authority under reference number 775330.
- 1.3 We comply with **Data Protection Laws**, which means the Data Protection Act (2018) (**DPA**) and any applicable laws, regulations, and other legal requirements relating to (a) privacy, data security, and protection of personal data; and (b) the processing of any personal data, which may include, but are not limited to, the EU law retained version of the GDPR (**UK GDPR**).
- 1.4 We are registered with the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (ico.org.uk), and our registration number is ZB872096. If you have any concerns about data protection, we would appreciate it if you contacted us first so we can discuss these with you before you approach the ICO. For data protection matters, please email us at support@miawealth.co.uk.
- 1.5 We respect your privacy and are committed to protecting your personal data. This policy explains the terms on which we collect and process your personal data, and how we protect your personal data, such as when you:
 - (a) visit our website at www.miawealth.co.uk,
 - (b) use our app (**app**),
 - (c) contact us with any enquiry, or
 - (d) otherwise engage with us.

2. The data we may collect about you

- 2.1 Personal data/information means any information about an individual from which that person can be identified. It does not include anonymous data. We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:
- (a) **Identity Data** includes your full name, marital status, nationality, title, date of birth, and employment status, national insurance number and gender.
 - (b) **Contact Data** includes home address, delivery address, billing address, email address and telephone number.
 - (c) **Financial Data** includes bank account details, card payment details, salary and other income information, savings, financial commitments and other expenses.
 - (d) **Transaction Data** includes details about payments to and from you and other details of the products you have purchased from us or investments you have made.
 - (e) **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access our website.
 - (f) **Profile Data** includes your username and password (if applicable), purchases or orders made by you, your interests, preferences, feedback, and survey responses.
 - (g) **Usage Data** includes information about how you use our website, app and services.
 - (h) **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.
 - (i) **Location Data** includes information about where you access our website or app from. Please see section 3 for more information.
 - (j) **Aggregated Data** such as statistical or demographic data for any purpose, is not considered personal data in law as this data will not directly or indirectly reveal your identity to us. We may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature.
 - (k) **Special Category Data** means special categories of personal data and includes information about your health, race or ethnicity, criminal convictions, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, genetic and biometric data. Please note that we do not automatically include any such data.

3. How is your personal data collected?

We may use different methods to collect data from and about you including through:

- 3.1 **Direct interactions.** You may give us your Identity Data and Contact Data by filling in forms or by corresponding or engaging with us by post, phone, email, social media, making a purchase on our website, or otherwise.
- 3.2 **Automated technologies or interactions.** As you interact with our website, app and services we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. We may also receive Technical Data about you if you visit other websites employing our cookies, and Location Data if you use our app's location-enabled features.
- 3.3 **Public sources.** We may collect personal data about you from public sources, such as Google, Companies House, or the electoral register.

4. How we use your personal data

We will only use your personal data when we can rely on a legitimate (lawful) basis, such as:

- 4.1 **Contract:** Where we need to perform the contract, we are about to enter into or have entered into with you.
- 4.2 **Legitimate Interests:** Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- 4.3 **Legal Obligation:** Where we need to comply with a legal obligation.
- 4.4 **Consent:** We rely on consent only where we have obtained your active agreement to use your personal data for a specified purpose, for example if you subscribe to an email newsletter.

5. Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use the various categories of your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Purpose/use	Type of data	Lawful basis for processing including basis of legitimate interest
To enable you to submit an enquiry to us, whether via email, through our website or via social media, including but not limited to LinkedIn, Facebook and Instagram	Identity Contact	Contract Legitimate Interests (to enable us to respond to your enquiry)
To process and deliver the app and services to you including: (a) Manage payments, fees, and charges (b) Collect and recover money owed to us	Identity Contact Profile Marketing and Communications	Contract Legitimate Interests
To enable you to apply for a junior ISA or a pension	Identity Contract Financial	
To manage our relationship with you which will include: (a) Notifying you about changes to our terms and conditions or this privacy and cookies policy (b) Dealing with your requests, complaints, and queries	Identity Contact Profile Marketing and Communications	Contract Legal Obligation Legitimate Interests (to keep our records updated and manage our relationship with you)
To enable you to register for our mailing list/email marketing	Identity Contact Marketing and Communications	Contract Consent

		Legitimate Interests (to enable us to provide you with the newsletter/email marketing and present you with information, or services we consider you will be interested in)
To administer and protect our business and our website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	Identity Contact Technical	Legitimate Interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) Legal Obligation
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	Identity Contact Profile Usage Marketing and Communications Technical	Legitimate Interests (to study how customers use our services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website, services, marketing, customer relationships and experiences	Technical Usage	Legitimate Interests (to define types of customers for our services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about goods or services that may be of interest to you	Identity Contact Technical	Legitimate Interests (to develop our products/services and grow our business)

	Usage Profile Marketing and Communications	
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6. Direct marketing

- 6.1 You will receive marketing communications from us if you have requested information from us or purchased services from us and you have not opted out of receiving the marketing.
- 6.2 We may also analyse your Identity Data, Contact Data, Technical Data, Usage Data and Profile Data to form a view which products, services and offers may be of interest to you so that we can then send you relevant marketing communications.

7. Third party marketing

We will get your express consent before we share your personal data with any third party for their own direct marketing purposes.

8. Opting out of marketing

- 8.1 You can ask to stop sending you marketing communications at any time by following the opt-out links within any marketing communication sent to you or by contacting us at support@miawealth.co.uk.
- 8.2 If you opt out of receiving marketing communications, you will still receive service-related communications that are essential for administrative or customer service purposes for example relating to updates to our terms and conditions and checking that your contact details are correct.

9. Cookies

- 9.1 Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site.
- 9.2 A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer if you agree. Cookies contain information that is transferred to your computer's hard drive.
- 9.3 We use the following cookies:

- (a) **Strictly necessary cookies.** These are cookies that are required for the operation of our website. They include, for example, cookies that enable you to log into secure areas of our website, use a shopping cart or make use of e-billing services.
 - (b) **Analytical or performance cookies.** These allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily.
 - (c) **Functionality cookies.** These are used to recognise you when you return to our website. This enables us to personalise our content for you, greet you by name and remember your preferences (for example, your choice of language or region).
 - (d) **Targeting cookies.** These cookies record your visit to our website, the pages you have visited and the links you have followed. We will use this information to make our website and the advertising displayed on it more relevant to your interests. We may also share this information with third parties for this purpose so that they can serve you with relevant advertising on their websites.
 - (e) **Web beacons.** We may use other, similar technologies from time to time, like web beacons (sometimes called "tracking pixels" or "clear gifs"). These are tiny graphics files that contain a unique identifier that enables us to recognise when someone has visited our website or opened an email including them. This allows us, for example, to monitor the traffic patterns of users from one page within a website to another, to deliver or communicate with cookies, to understand whether you have come to the website from an online advertisement displayed on a third-party website, to improve site performance, and to measure the success of email marketing campaigns. Since web beacons often depend on cookies to function effectively, restricting cookies can diminish their operational effectiveness. If you choose to decline cookies, be aware that this may affect the performance of web beacons and the overall user experience on our website.
- 9.4 Please note that the following third parties may also use cookies, over which we have no control. These named third parties may include, for example, advertising networks and providers of external services like web traffic analysis services. These third party cookies are likely to be analytical cookies or performance cookies or targeting cookies:

(a) **Meta Pixel (Facebook)**

We use Meta Pixel to measure the effectiveness of our advertising on Facebook and Instagram, and to help deliver more relevant ads to users. This may involve the use of **targeting cookies** and tracking technologies that monitor user activity across websites. Meta may collect information such as IP address, browser type, and pages visited. You can learn more in [Meta's Privacy Policy](#).

(b) **Plausible Analytics**

We use Plausible to collect anonymized analytics data and better understand how users interact with our site. Plausible is a privacy-friendly, GDPR-compliant analytics platform that **does not use cookies, does not collect personal data, and does not track individual users**. For details, see Plausible's [data policy](#).

(c) **Google reCAPTCHA v3**

We use Google reCAPTCHA v3 to protect our website from spam and abuse. reCAPTCHA analyzes user behavior to distinguish humans from bots. While this is considered a **strictly necessary security feature**, Google may collect data such as your IP address and browser characteristics in accordance with its own [Privacy Policy](#). No cookies are set by us, but reCAPTCHA may use its own cookies or fingerprinting mechanisms.

9.5 You can block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our website.

9.6 Information about how to configure your browser to block cookies can be found at:

- (a) Google Chrome
- (b) Microsoft Edge
- (c) Internet Explorer
- (d) Firefox
- (e) Safari
- (f) Safari Mobile
- (g) Opera

10. Disclosures of your personal data

10.1 We may disclose your information in the following cases:

- (a) We can disclose your personal data to staff members in order to facilitate the provision of products to you.
 - (b) We can disclose your personal data to service providers we engage to deliver the investment products to you, namely our Custodian and Investment Services Provider.
 - (c) We can disclose your personal data to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy and cookies policy.
 - (d) We can disclose it to other businesses in our group, as defined in the UK Companies Act 2006.
 - (e) We can disclose it if we have a legal obligation to do so, or in order to protect other people's property, safety, or rights.
 - (f) We can disclose it to our Principal Firm in order to meet our regulatory requirements.
 - (g) We can exchange information with others to protect against fraud or credit risks.
- 10.2 We use a variety of third party services (sub-processors) as part of our business activities and you/we will therefore share your personal data with these sub-processors. The types of sub-processors we might use fall into different categories, as follows:
- (a) Payment processing services
 - (b) Order investment service providers
 - (c) Custodian
 - (d) Analytics service providers
 - (e) Event/campaign management service providers
 - (f) Website management service providers
 - (g) Information technology and related infrastructure provision
 - (h) Email delivery services
 - (i) Our auditors and legal advisors
 - (j) Our Principal Firm

(k) The Financial Conduct Authority

10.3 We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

11. Data security

11.1 Data security is of great importance to us, and to protect your data we have put in place suitable physical, electronic, and managerial procedures to safeguard and secure data we collect. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business to know. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality. We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

11.2 If there is an incident where we become aware that there has been a data breach, we will let you know without undue delay. We will then take all necessary steps, including informing the ICO, to limit the extent of the breach and to prevent a further recurrence.

11.3 Where we have given you (or where you have chosen) a password which enables you to access certain parts of our website, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

11.4 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 information transmitted to our website; any transmission is at your own risk.

12. International transfers

12.1 We may transfer your personal data outside of the UK or the European Economic Area (EEA) where we engage third parties to provide services on our behalf, such as to receive services or deal with payment. Whenever we transfer your personal data out of the UK or the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

(a) We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data

(b) We may use specific standard contractual terms approved for use in the UK which give the transferred personal data the same protection as it has in the UK, namely the International Data Transfer Addendum to the European Commission's standard contractual clauses for international data transfers.

12.2 Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the UK or the EEA.

13. Additional data we collect for Gifting and Mia Memories

13.1 We may collect and process additional Profile Data and Usage Data in connection with the gifting feature and Mia Memories, including:

(a) details of gift invitations sent and received;

(b) the status and expiry of invitation links;

(c) images uploaded by a parent, including a child's image used in a gift request;

(d) images uploaded by supporters;

(e) user-generated content, messages, and interactions connected with Mia Memories; and

(f) notification and reminder preferences and delivery records.

14. How we use that data

14.1 We use this data to:

(a) operate the gifting feature and Mia Memories;

(b) create and manage supporter invitations;

(c) display uploaded images and content within the relevant feature;

(d) send service messages, reminders and notifications relating to gifts, subscriptions and Mia Memories;

(e) administer subscriptions, renewals and access to premium features; and

(f) maintain security, prevent fraud, and investigate misuse of the app.

14.2 We rely on performance of our contract with you, our legitimate interests in operating and improving the app and protecting users, and, where required, your consent.

15. Mia Memories Data Retention

15.1 Images, invitations, and Mia Memories content are retained only for as long as needed to operate the relevant feature, unless a longer retention period is required for legal, regulatory, fraud-prevention, dispute-resolution, or security purposes.

15.2 Supporter invitation links are deactivated after 120 hours.

15.3 Mia Memories are available to view for 30 days and are then removed from active display in the app.

15.4 When a user deletes a Mia Memory, it is deleted from active systems and is no longer recoverable in the app, subject to any limited retention required for backup, security, fraud prevention, legal claims, or regulatory compliance.

16. Data retention

16.1 We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

16.2 To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

16.3 By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers for tax purposes.

16.4 In some circumstances you can ask us to delete your data: see section 14 below for further information.

16.5 In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

17. Your legal rights

17.1 You have a number of rights under Data Protection Laws in relation to your personal data. You have the right to:

- (a) **Request access** to your personal data (commonly known as a "subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- (c) **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- (d) **Request erasure** of your personal data in certain circumstances. This enables you to ask us to delete or remove personal data 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 data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- (e) **Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) as the legal basis for that particular use of your data (including carrying out profiling based on our legitimate interests). In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your right to object.
- (f) You also have the absolute **right to object any time to the processing of your personal data for direct marketing purposes** (see 'Opting out of marketing' in section 8 for details of how to object to receiving direct marketing communications).
- (g) **Request the transfer of your personal data** to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

- (h) **Withdraw consent** at any time where we are relying on consent to process your personal data (see the table in section 5 for details of when we rely on your consent as the legal basis for using your data). However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.
- (i) **Request restriction of processing of your personal data.** This enables you to ask us to suspend the processing of your personal data in one of the following scenarios:
- i. If you want us to establish the data's accuracy;
 - ii. Where our use of the data is unlawful but you do not want us to erase it;
 - iii. Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or
 - iv. You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- 17.2 If you wish to exercise any of the rights set out above, please contact us at support@miawealth.co.uk.
- 17.3 You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.
- 17.4 We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.
- 17.5 We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

18. **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. When you leave our website, we encourage you to read the privacy policy of every website you visit.

19. Changes to this privacy and cookies policy and your duty to inform us of changes.

19.1 We keep our privacy and cookies policy under regular review, and we can update this policy from time to time as laws change or as our website, application or services change.

19.2 It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us, for example a new address or email address.