

Your Advisers



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Your Guide To Our Services

Version 2.4 - October 2025



*Our Comet adviser understood our needs.
He really listened and heard what we asked.
Comet always had a reply quickly even
if it was to tell me how long it would
take for action.*

Hilary and Keith, Maidenhead

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Setting the Scene For You

The Purpose of This Document

- ▶ Provide you with information about our business and services, so that you know what to expect if you choose to work with us.
- ▶ Inform you about how we are regulated, and provide you with reassurance about how we protect your money, giving you peace of mind.
- ▶ Give you confidence in our advice process, and transparency of our services and pricing structure, as outlined in the Terms of Business section.
- ▶ Set out the terms of business between our firm and you as a possible or current client.
- ▶ These 'Your Guide to our Services' apply until further notice. In case of any ambiguity, the 'Terms of Business' section will take precedent.
- ▶ You, as well as we, can end these terms at any time, without penalty and this will not affect any outstanding transactions being carried out on your behalf.

A Little About Comet Wealth

Comet Wealth Management is the result of a merging of two brands being Polestar Wealth Management and Comet Wealth Management.

Our clients recognise us as being a reliable, stable, and trusted source of advice, from which you can gain reassurance about your current position, regardless of where you are on your financial journey.

Our aim is to provide you with a high level of personal care, focus and attention to detail.

Our financial advisers are supported by our team of administrators and researchers, freeing up their time to ensure they spend as much time with YOU as you require. The main adviser offices are based in Yateley in Hampshire.

Your Client Charter

These are our promises to you.

As your trusted Financial Adviser, we will:

-  Aim to deliver a fully comprehensive, high-quality service standing among the best in the financial services profession.
-  Always keep you informed and ask for your consent before proceeding if any material interest or conflict of interest should arise.
-  Maintain a high level of professionalism by always acting to deliver good outcomes for you, as set out by our regulator, the Financial Conduct Authority.

To help us give you the most appropriate financial advice, we ask that you:

- ▶ Let us know if we can further clarify any of our recommendations. It is essential that you understand the advice that we have given, and we are always happy to provide further clarification or information.
- ▶ Speak to us if our service has not met your expectations. Hearing how we've performed means that we can put it right for you.
- ▶ Always ensure you provide us with accurate information and let us know when this changes.

How We Help People Like You and Your Family

We find that clients prefer to be treated as individuals, seeking to establish a relationship with a specific individual that they can get to know and trust.

This is why many of our clients, who previously dealt with Banks and larger advisory firms, have come to us, because:

- ▶ You will be treated as an individual – not a number.
- ▶ You can establish a close working relationship with your Independent Financial Planner.
- ▶ Your financial planner will be available when needed as well as delivering periodic reviews.

What sort of people do we help most?

We are well positioned to help people who:

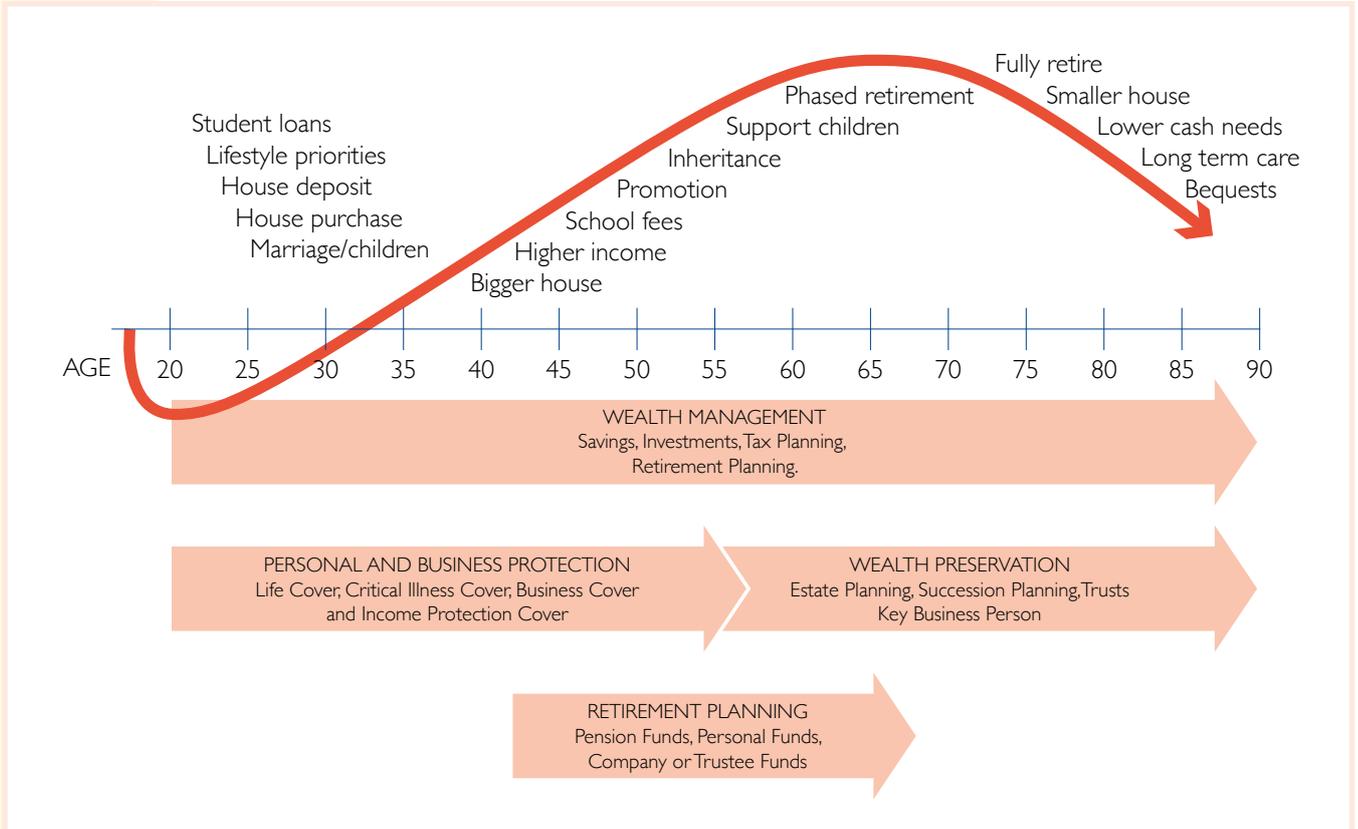
- ▶ have little time and / or expertise to manage their financial affairs.
- ▶ are seeking expert financial advice on achieving their goals.
- ▶ want to make the most of their hard earned money.
- ▶ want an expert to help and cut through the jargon and depth of financial information available to them.
- ▶ are seeking a sense of control, reassurance and financial freedom.
- ▶ have a particular issue they need financial help with.

Our research showed that 4 of every 5 people we meet for the first time recognise something so valuable that they take immediate action.

We will be there for you throughout your financial journey.



How We Can Help at Every Stage of Your Financial Life

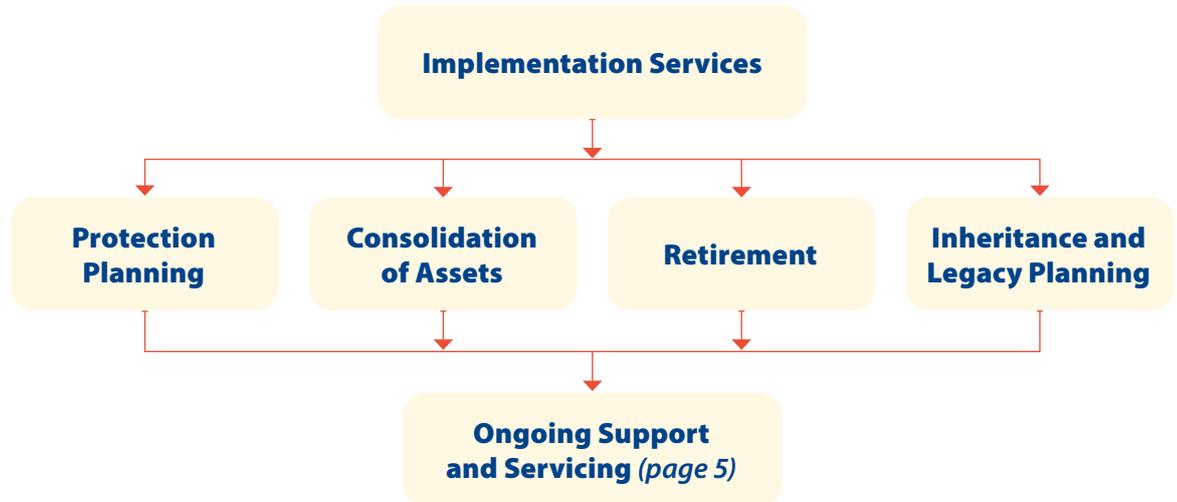


Areas We Can Advise You On

	Protecting Your Family (Financial Independence) – Protecting you and your family from the life you don't yet know.
	Generational Financial Advise – Supporting your families generational financial advise.
	Creating, Managing and Retaining Your Wealth – Through making the most of your tax-efficient investment opportunities and helping you assess the risks to your wealth such as inflation, market volatility, low interest rates etc.
	Business – Helping small and medium-sized enterprises to grow and become more profitable.
	Saving For Retirement – We'll help you plan for your retirement, guiding you towards financial security and peace of mind for your later years.
	Estate Preservation – Preserving the value of your estate for the benefit of your family and beneficiaries, and mitigating inheritance tax.



Our Services



Your Lifetime Planning Events

The four financial planning events that can be considered for implementation fees are Protection Planning, Consolidation of Assets, Retirement, and Inheritance and Legacy Planning. These are the only occasions an implementation fee will be charged outside of special projects. All other actions are funded through your ongoing fees as outlined on page 5.

Advice and Implementation

We will assess the suitability of any current plans for you, explore and research various scenarios and options and put together a road map to help you to move towards your current and future objectives.

We will act as the intermediary between the product provider(s) and you with a view to arranging the purchase of the Retail Investment Products as we have agreed.

Unless otherwise explained the fees below will cover a full advice process: understanding your current situation, objectives, attitude to risk, research to identify suitable solutions, documenting our recommendations and implementing the agreed solutions.

Implementation Fees

When our work involves financial planning around a life time planning event, our implementation fees are 2% of the total funds to be invested for funds up to £2 million – which for an investment of £200,000 would be £4,000 and for £550,000 would be £11,000.

For funds in excess of £2 million or where your personal situation is more complex, a personalised fee agreement will be put in place.

For Protection planning we receive a payment directly from the relevant insurer for any plans that are put in place. The full amount of any commission we receive in this way will be fully disclosed to you.

No charges will ever be implemented without your full agreement. All charges will be confirmed in writing, in monetary terms as part of your full advice report.

Financial Advice Across Your Families Generations

If you are investing on behalf of your children, who are financially dependant on you, then the advice falls under your own client agreement and fees.

Minimum Fees and VAT

- ▶ The fees outlined are raised when the investment is made and will NOT be subject to VAT.
- ▶ Our minimum fee for implementation purposes is £2,000. Where the funds invested are less than £100,000 the fee due will be £2,000.
- ▶ If you ask us to stop work after agreeing to these fees you will be invoiced a proportion of the agreed fee. This fee will be based on when you ask us to stop working and subject to our minimum fee.
- ▶ Further Advice and Implementation outside of the lifetime planning events covered here, such as Bed and ISA, Bed and pension etc would be covered by your ongoing support fees as outlined on page 5.



Financial Planning events

► Protection Planning

Protection planning involves reviewing your financial situation to ensure you and your loved ones are financially secure if the unexpected happens. Your financial adviser can help you assess the right level and type of cover – such as life insurance, critical illness cover, or income protection – based on your personal circumstances and priorities. This tailored approach ensures you have peace of mind, knowing there's a safety net in place to protect your lifestyle and long-term plans.

► Retirement

As you approach retirement, your financial adviser can help you make informed decisions about how and when to access your pension and other assets. This includes exploring your income options, such as drawdown or annuities, assessing tax implications, and ensuring your money lasts throughout retirement. With expert guidance, you can step into this new phase of life with confidence and clarity, knowing your finances are aligned with your lifestyle goals.

► Consolidation of Assets

Working with a financial adviser to consolidate your assets means bringing together your various pensions, investments, and savings into fewer, more manageable accounts. This can help provide a clearer view of your overall financial position, reduce paperwork, and potentially lower costs. Your adviser will assess whether consolidation is appropriate for your circumstances, ensuring any decisions support your long-term financial goals and are in line with regulatory requirements.

► Inheritance and Legacy Planning

Inheritance and legacy planning ensures your assets are passed on in line with your wishes, as efficiently and tax-effectively as possible. Your financial adviser can help you navigate the complexities of estate planning, including the use of wills, trusts, and gifting strategies. With careful planning, you can provide for loved ones, support causes you care about, and leave a lasting legacy – while also helping to reduce the impact of Inheritance Tax where appropriate.

Ongoing Support and Servicing

We offer a proactive ongoing service that ensures your financial plans are monitored and adjusted based on your developing circumstances and kept fully up to date.

As part of our ongoing services we will continue to review the suitability of your investments and financial arrangements to support you in achieving your agreed objectives and outcomes.

Importantly, our ongoing service will ensure that we retain a good, ongoing understanding of your circumstances and can pivot with you as your life evolves.

Core Services Provided Include:

- Biennial Face to Face meeting.
- Annual Assessment of your financial goals and objectives against your existing plans and investments, to ensure their ongoing suitability.
- Annual assessment of investment performance and markets to determine whether you are on track to meet any specific goals/objectives.
- Annual review of risk taken with investments.

Supplementary Services Provided as Required:

- Income variation review and forecasting.
- Access to your client support team for help with policy information and queries.
- Up to four Valuation reports per annum (further reports available directly from providers).
- An appraisal of prevailing economic conditions. e.g. interest/annuity rates and movements and how such things might impact on your plans.

- An assessment of legislative or statutory changes, budget announcements etc that might impact on your planning strategy, for example changes in taxation, allowances, state benefits etc.
- Exclusive access to the Comet Investment Strategy.
- Investment top ups including Bed and ISAs, Bed and Pensions etc at no extra implementation cost.

Ongoing service clients receive a **20% discount** on any additional implementation advice outside of investment top ups. Ongoing servicing ensures that we have fully up to date financial information and records on your personal circumstances, which reduces the amount of work involved when completing new implementation cases on your behalf!

Ongoing Support and Servicing Fees

Your ongoing fee is 1% on all funds under management up to £2 million – for example if your investments are valued at £200,000 our fee would be £2,000 per annum and if valued at £550,000 our fee would be £5,500 per annum. Please note that as the fee is based on the investment value, the actual amount we receive will increase (or decrease) in proportion to any increase (or decrease) in the value of your portfolio.

For investments valued in excess of £2 million or where your personal situation is more complex, a personalised bespoke ongoing fee agreement can be put in place.

A minimum ongoing fee of £1,800 per annum will apply for your Ongoing Support and Servicing.

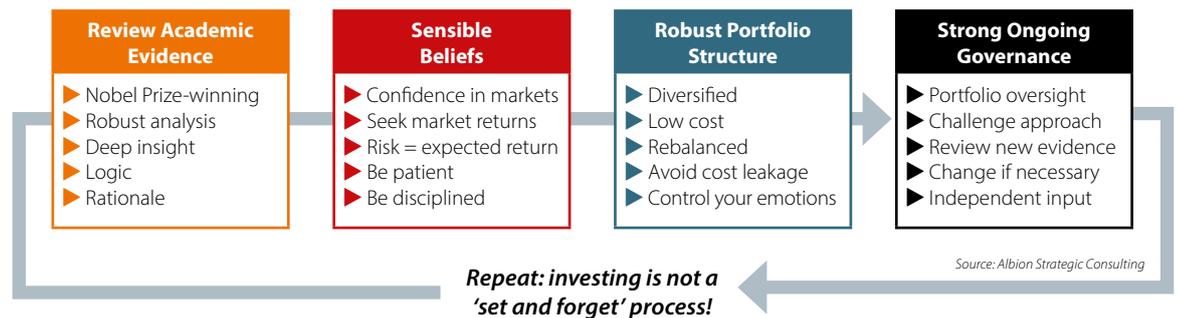


Comet Investment Strategy and what this involves on your behalf

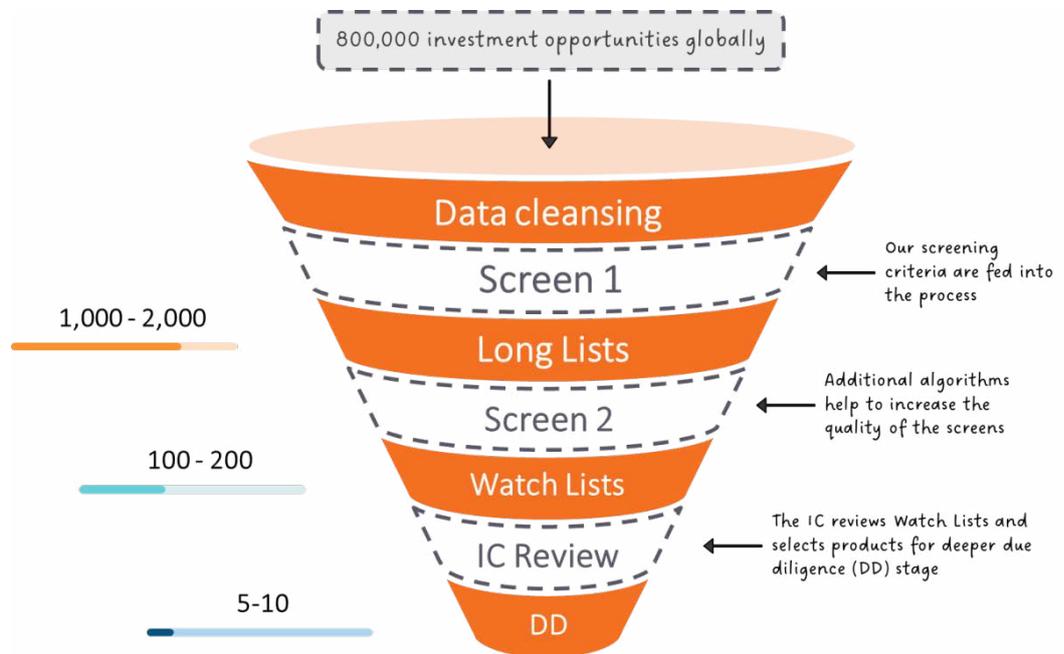
Start by Building Your Investment Compass

Investing money well requires a logical and robust framework on which to build a lifelong investment programme. It needs to be grounded in investment theory, supported by empirical evidence, and enhanced with an insight into the behavioural traps and pitfalls that all investors face, that can and do cost them dear. We have spent considerable time researching the theory and the evidence to come up with an investment programme that we, and you, can fully believe in.

> FOUNDATION: Building a Sensible Way to Invest



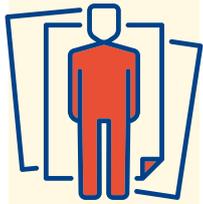
> ONGOING: Overview of the Fund Selection Process



Source: Albion Strategic Consulting.

This is different because it avoids the “pick and pray” practice of other investment approaches.

The Comet Investment Strategy is only available to ongoing service clients because any future changes may create a foreseeable financial harm to clients investments and their planning objectives hence an ongoing service is the most appropriate and what we offer.



Your Investment Committee and Its Role

The Investment Committee (IC) is the formal body that is responsible for the governance of the investment process at Comet Wealth Management. Meetings are currently held at a minimum twice a year. Meetings can be called on an ad hoc basis if circumstances warrant it, such as a material market fall. To recap, the purpose of the IC is to:

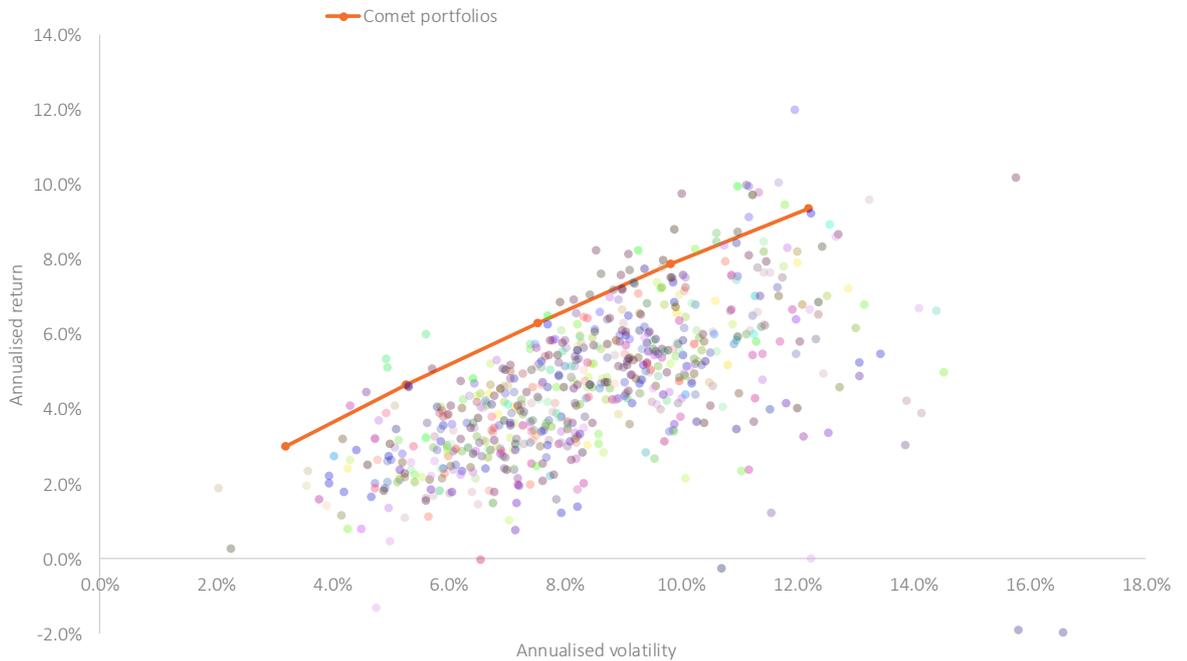
- ▶ Define and implement a risk-focused approach to investing.
- ▶ Continually test, refine and reaffirm its investment

process including: the firm's investment philosophy; the structure of client portfolios; the asset classes (e.g. equities, bonds, commercial property) that it uses or excludes; and the 'pure-asset-class' lower cost funds that provide access to the rewards of desired asset classes.

- ▶ Employ best-practice fiduciary standards in overseeing the investment program.
- ▶ Help educate clients about what they own and why they own it.

▶ OUTCOMES: Does it Work? – Multi-asset Manager Comparison

Multi-asset manager comparison produced for Comet on 02/05/2025 by Albion Strategic Consulting. Data from Feb-14 to Apr-25.



Portfolio	Managers Beaten (RA)*
Cautious	88%
Cautious to Moderate	96%
Moderate	97%
Moderate to Adventurous	97%
Adventurous	97%

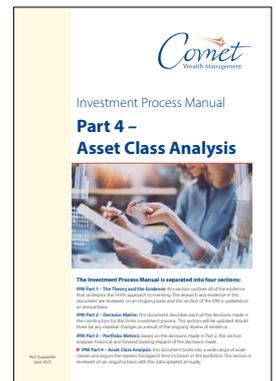
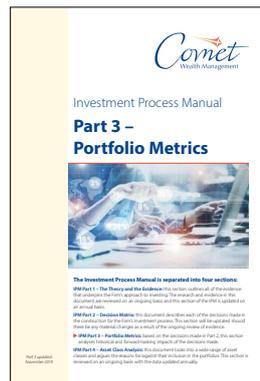
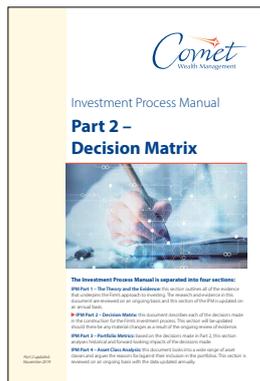
Please note – performance data incorporate fund changes made over the period.

121 multi-asset managers
1276 funds in the peer group
651 funds survived (51%)
625 merged/liquidated

*(RA): Risk-adjusted performance calculated using >0 Sharpe ratios.

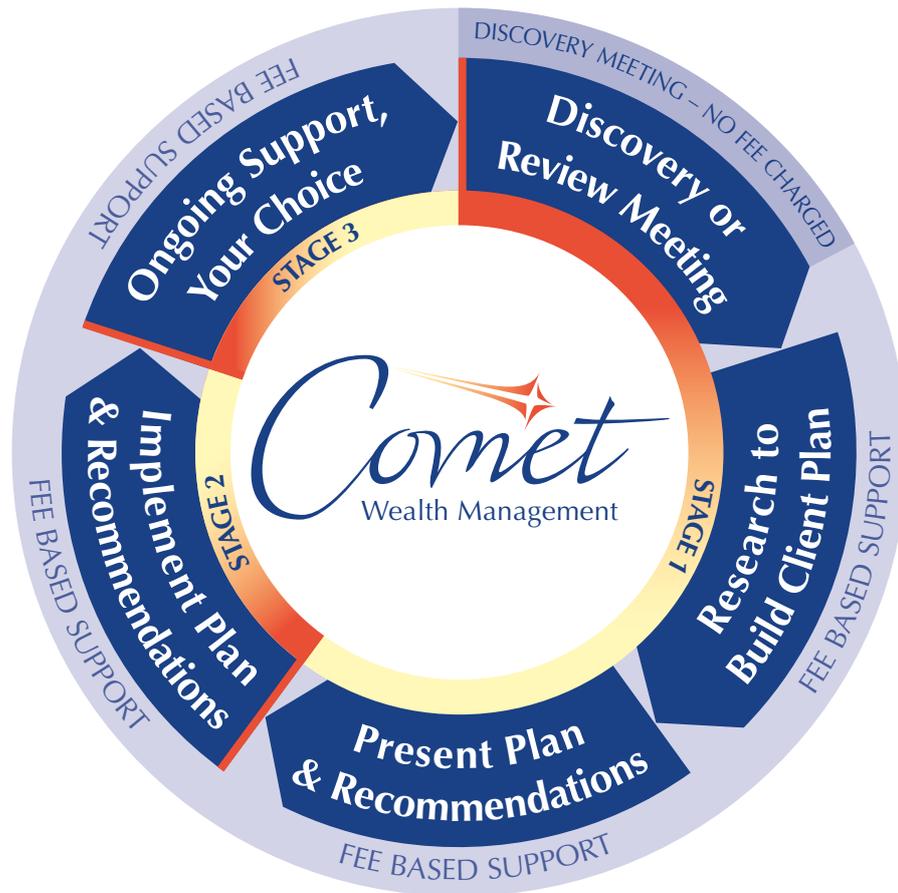
The Comet Wealth Investment Process Manual (IPM)

Click cover to download the document





Our Process for Quality Advice



Stage 1.1) Discovery or Review Meeting

Your financial planner will start by listening carefully to your objectives, needs and priorities, in the context of your short, medium and long term financial aspirations.

By gathering information from you, they begin to understand your current situation and what provisions you have in place already.

Then, by exploring your hopes and aspirations, they can construct a picture of what you want to achieve, taking into account your knowledge, experience and attitude to risk and return.

This stage also allows you to understand what to expect from us and how you will benefit from using our services.

Stage 1.2) Research to Build Client Plan

We'll explore and research various scenarios and options and start to put together a road map to help you move towards achieving your objectives.

We will assess the suitability of your current plans and make recommendations to help you achieve your current and future objectives. *This stage is fee based.*

Stage 1.3) Present Plan and Recommendations

Your financial planner will sit down with you and go through your plan and recommendations answering any questions you may have. *This stage is fee based.*

Stage 2) Implement Plan and Recommendations

Here's where your plans start to take shape.

Most of our clients prefer us to complete, check and manage the documentation required for them to put 'Their Plan' into action. This saves them a lot of time and energy, and helps ensure that plans are set up in line with expectations. The cost of this service will be included in the fee structure that has been agreed.

Alternatively you may decide you wish to implement our recommendations yourself, and so can simply pay a fee for our time and expertise up to this point.

Should you choose to implement your plan and your choice of recommendations, your fee in 1.2 and 1.3 may be discounted against your stage 2 implementation fee.

Stage 3) Ongoing Support for You and Your Family

We believe that most clients will benefit from a review of their circumstances. This may depend on which stage of life you are in as well as your relative level of wealth.

Many clients like to meet up regularly to take advantage of valuable allowances, or understand the impact of UK Government Budget announcements.

You will also hear from us at other times during the year when we feel something may be of interest to you, or you may wish to get in touch yourself, if your circumstances or objectives have changed.



Meet Your Support Team



Natasha Beaumont
Operations Manager

Your support team work from the Comet Wealth main office in Yateley.

Address: Hurdcott Barn, Cricket Hill Lane,
Yateley, Hampshire, GU46 6BB

Telephone: 01252 626200

Email: support@cometwealth.co.uk



River Wales – DipPFS
Client Admin Manager



Helena Mallett
Client Administrator



Tracey Russell
Payments Manager



Theresa Dunsby
Accounts Manager

Our Payment Guidelines

So you are clear about how our fees work and how to pay for our services.

Being Clear About Fees

It is important that you understand how you will pay us for our services. We will always agree the fees we will charge in advance, together.



We typically provide an intermediation service, **no VAT** is due. However, there may be other occasions where VAT is due. If so, we will tell you.

You are **not** obligated to implement any of our recommendations. However, we may still charge a fee for our advice.

When we tell you about a fee, you will always receive a clear explanation of:



Our total
fee



The advice
or service it
relates to



How we've
calculated it



When you
need to pay



Your payment
options

This is the case no matter whether you use our ongoing service or you are getting advice for a one-off financial need.

You are in control of the whole process and before you appoint us to work for you there will be an Authority To Proceed (ATP) provided that sets out the work you wish us to complete and the associated fees. You have no obligation to any fee or work before you have signed your ATP.

Three ways we can receive payment for our advice and services:

1. Provider Facilitation of Your Investment Advice Fee

If you decide to follow our recommendation and invest, you can choose to authorise the investment provider to deduct our advice fee from your overall investment.

You may also pay any ongoing service charges from your investment.

What this means for you: *In some circumstances this could create a capital gain and a possible tax liability. We will explain such implications when giving your recommendation.*

2. Paying Us Directly

We may charge a fee for advice we give you. It may be more beneficial for you to pay our fee directly (e.g. for tax purposes).

Payment options: *You can pay by bank transfer or cheque. We never handle cash.*

3. Provider Payments to Us

We don't receive commission for setting up regulated investment products for you. However, we may receive commission on certain non-regulated products and protection products.

How we'll let you know: *If we do receive commission we will tell you how much in a 'Key Facts Illustration'.*



Terms of Business

- ▶ This section sets out the terms of business between our firm (as a trading style of Comet Wealth Ltd) and its clients. These 'Terms of Business' apply until further notice.
- ▶ Either we or you can end these terms at any time, without penalty and this will not affect any outstanding transactions being carried out on your behalf.
- ▶ Payment for our services will be on the basis of an agreed Advice Fee. We will discuss your payment options with you and answer any questions you have. We will not charge you until we have agreed with you how we will be paid. You will see all our fee options displayed to you on the following pages.

Confirmation of Our Advice Areas

INSURANCE – advice is given on the basis of a fair and personal analysis of the market.

 **Advice** – Your financial planner will advise and make a recommendation for you after we have assessed your needs for Life Assurance, Critical Illness, Income Protection, Accident Sickness and Unemployment, Home Insurance, and Private Medical Insurance.

 **No advice** – You will not receive advice or a recommendation from us. We may ask some questions to narrow down the selection of products that we will provide details on. You will then need to make your own choice about how to proceed.

INVESTMENT

 **Advice** – Your financial planner will advise and make a recommendation for you after we have assessed your needs.

 **No advice** – You will not receive advice or a recommendation from us. We may ask some questions to narrow down the selection of products that we will provide details on. You will then need to make your own choice about how to proceed.

We will confirm to you if any product we are recommending is not regulated by the FCA.

Confirmation of Whose Products We Offer

INSURANCE

 We offer Life, Critical Illness, Private Medical Insurance, Income Protection Whole of Life and General Insurance products from a range of insurers.

INVESTMENT

 **Independent advice** – Our recommendation will be based on a comprehensive and fair analysis of the market and include a sufficient range of financial instruments, structured deposits and other retail investment products.

 **Restricted advice** – Our recommendation will be based on products from a panel of leading investment companies. We will be happy to provide you with a list of the companies on the panel at your request.

What You Will Pay For Our Services

INSURANCE

 No fee for Life Assurance, Critical Illness, Income Protection, Accident Sickness and Unemployment, Home Insurance, and Private Medical Insurance. We will be paid by commission from the company, that has already been included in the premium.

You will receive a quotation which will tell you about any other fees relating to any particular insurance policy.

INVESTMENT

 **Standard Fees** – where you wish to take advantage of our full advice process, or our ongoing service options. These are shown by way of implementation and ongoing service fees, and it is likely that no VAT is due on these fees.



Ad hoc Fees – where you do not wish to subscribe to an ongoing service, or where you want specific advice or project work. It is likely that VAT may be due on these fees.

Payment for our services will be on the basis of an agreed Advice Fee. We will discuss your payment options with you and answer any questions you have. We will not charge you until we have agreed with you how we will be paid. You will find a breakdown of our fees on pages 4 & 5.



Other Important Information

The Permitted Scope of Our Advice

We have set out above the general permitted business of Comet Wealth Management by the FCA.

Examples of products and services which we are prohibited from recommending include the following:

- ▶ Any overseas service or product (for example QROPS and QNUPS but excluding Offshore bonds designed for UK resident clients); and
- ▶ Non-Mainstream Pooled Investments (NMPIs), such as Unregulated Collective Investments Schemes (UCIS).

In the event that you wish to consider a product or service which is outside of the offering of Comet Wealth Management, we may be able to introduce you to a third party who might be able to provide you with further information and/or advice on a particular product or service. Please note though that in such circumstances, any such introduction and any information and/or advice on the product and service provided by that third party will be separate and distinct to those offered by any Comet Wealth Management. As such, Comet Wealth Management does not accept any responsibility for any such introduction or for information and/or advice provided by any third party.

Please do not hesitate to call us should you have any queries or concerns: 01252 626200

Complaints – If You Are Not Happy With Our Service

If you are not happy with our service or have a complaint about your Adviser or any financial advice you have received from your Adviser please contact us:

In writing:

Comet Wealth Management Complaints Department, Hurdcott Barn, Cricket Hill Lane, Yateley, Hampshire GU46 6BB

Email: support@cometwealth.co.uk

Telephone: (01252) 626200

We will be happy to provide you with a summary of the internal procedures for handling complaints, this is available without charge upon request or will be provided to you when we acknowledge your complaint.

If you cannot settle your complaint with us, you may be entitled to refer it to the Financial Ombudsman Service.

The Financial Ombudsman Service can be contacted as follows:

In writing:

The Financial Ombudsman Service, Exchange Tower, London E14 9SR

Telephone: 0300 1239123 or 0800 023 4567

Email: complaint.info@financial-ombudsman.org.uk

Website: www.financial-ombudsman.org.uk

You should note that if your product is not regulated by the FCA (for example, a buy-to-let mortgage), you may NOT be entitled to refer the complaint to the Financial Ombudsman Service.

This is the current process. Should it change, we will notify you the next time we meet by issuing you with an updated version of this document. If, however, you want to have the updated version sooner you can request them at any time, and I will provide you with the updated process.

Our Contact Details – Comet Wealth Management

You may communicate with us at any time using the following contact details:

In writing:

Comet Wealth Management, Hurdcott Barn, Cricket Hill Lane, Yateley, Hampshire, GU46 6BB

By phone: 01252 626200

Email: support@cometwealth.co.uk

Our Regulator – The Financial Conduct Authority

Comet Wealth Management is a trading style of Comet Wealth Ltd (FCA register number is 833813) of Hurdcott Barn, Cricket Hill Lane, Yateley, Hampshire GU46 6BB which is authorised and regulated by the Financial Conduct Authority.

The permitted business of Comet Wealth Ltd is advising on and arranging pensions, investments and life assurance.

You can check this on the FCA's Register by visiting the FCA's website at www.register.fca.org.uk/s/ or by contacting the FCA on 0300 500 8082 or 0800 111 6768. The FCA address is: 12 Endeavour Square, London, E20 1JN.

Client Categorisation Levels For Your Protection

The FCA has rules which affect the rights you have as a client. In our dealings with you we will be representing you as the client.

By default, we categorise all of our individual clients as 'retail' clients. The range of financial products and investments we recommend are tailored to meet the needs of retail clients. As a retail client, you will have rights under the Financial Ombudsman Service (FOS) and the Financial Services Compensation Scheme (FSCS). These rights will apply to the provision of the advice we provide.

In most cases these rights will also apply to the products we recommend. However, there are some exemptions for specialist products such as Enterprise Investment Schemes and Venture Capital Trusts. Your adviser will let you know if the product recommended will not have rights under the FOS or FSCS.

There are other client categorisations that don't have these rights. These are "professional" clients and "eligible counterparties".

You may have the right to be categorised as a professional client and revoke your retail client status on request. Should you feel you have the skills, knowledge and experience to be a professional client and don't wish to have the same protection afforded to retail clients (as explained above), please let me know and we will complete the forms necessary to re-categorise you.

If you have any questions regarding your categorisation (e.g. if you are a large company), please write to Comet Wealth Management Hurdcott Barn, Cricket Hill Lane, Yateley, Hampshire GU46 6BB.



Client Money Peace of Mind

We do not handle Client Money. We never handle cash and will only accept a cheque made out to us in settlement of Advice and Service fees. Our preferred method of payment is via bank transfer.

Your Duty of Disclosure

Any financial advice we provide will be based on your personal financial circumstances and objectives. It is important that the information you give us is both accurate and a true reflection of your current circumstances.

It is your responsibility to provide complete and accurate information to a provider (a provider being for example, an organisation that provides insurance, mortgage, or investment related plans).

It is important that all statements made on any proposal form, or on any additional documentation are full and accurate.

Please be aware that if you fail to disclose any relevant information, or any change of circumstances to a provider, then the terms of your desired plan may be invalidated (e.g. an insurance claim may not be paid). We strongly recommend that the information you provide is checked thoroughly prior to submission.

Client Risk

The value of investments can fall as well as rise. You may get back less than you originally invested. The price of investments that we recommend to you may depend on fluctuations in financial markets or other economic factors that are beyond our control. The past performance of an investment or product is not a reliable indicator of future results. You should therefore carefully consider all investment/product decisions.

Any specific warnings relevant to particular investments, investment strategies, or products will be provided to you in your Suitability Advice Report and/or your Demands and Needs Statement collectively (Written Advice).

Investment and Protection Advice and Recommendations Scope

Any investment or protection advice your adviser provides will be based on your personal financial circumstances and objectives. We will confirm these and the reasons for any recommendation in your Written Advice

If you have asked for any restrictions on the types of investment or the markets you wish to invest in, these will be confirmed in your Written Advice. We will always make it clear when products are not within the 'regulated' scope and advise you of your rights.

Paying For Advised Services

Where payments are facilitated through a product, this will impact the actual amount remaining invested. Payment of the initial Advice and Ongoing Service fees facilitated by the relevant Product Providers or Platform administrators will be as a percentage of contributions invested or of the value of the plan's value/funds under management as at the anniversary of the initial investment. As such, the cash equivalent amount will vary depending on the value at the time.

Providers/Platform administrators will detail the specific process they operate to facilitate a fee in their literature. If

you opt to pay the Adviser Charge directly (not through a product) an invoice will also be provided, which must be settled within 14 days of issue (we reserve the right to charge interest on late payments at a rate of 3% above Bank base rate).

Full details of the final Advice will be provided in the Suitability Advice Report. Full details of any future Service fee will be provided either in the Suitability Advice Report or 'Authority to Proceed' document prepared for you by your Adviser. You may also be asked to sign and return a copy of the Authority to Proceed document to confirm your understanding and acceptance of the arrangements.

Other costs, including taxes, related to transactions may arise that are not paid via us or imposed by us. For further details on how to pay for our services, please read the "Guide to Our Services". There are no additional charges for our services for using a means of distance communication.

Implementing Investment Solutions

As with most investments there is a risk of loss, especially in the short-term (over periods of less than five years). If you need access to your money in the very short-term, then holding it in a risk-free bank account could be the right course of action. We will discuss these options with you, as well as providing a detailed Suitability Advice Report for you to read in your own time, before we implement our recommendations. This will help ensure you understand the advice you have been given. Of course, if you have any questions, we will be happy to help. You are not obliged to implement any of our recommendations. However, we may still charge a fee for our advice.

When we arrange an investment for you it will typically be made into a collective investment fund. These funds have a range of different investment strategies so we will recommend one that aligns with your attitude to risk and the period of time you wish to invest for.

These funds will typically be bought via an investment platform that we recommend for you. Once we have completed the advice process the investment will be made for you in a timely manner, and in accordance with our Best Execution Policy. For example, for the majority of collective investments, they will be bought or sold at the next Valuation Point (typically 12.00 Midday) the next business day, after the instruction has been received by the platform.

Once we have agreed on an appropriate solution, we will provide you with full details of the investment fund, platform, and all associated costs.

Cancellation / Termination of Authority

You can cancel these terms of business at any time without penalty. This will not affect any outstanding transactions being carried out on your behalf and you may still have to pay a fee to us – see Investment Advice Refunds below.

To cancel these terms of business you should notify us using the contact details above.

The Ongoing Service fee or our authority to act on your behalf can be cancelled at any time without any penalty by email or post using contact details above. These methods ensure we have an audit trail for your instruction. You will be responsible for cancelling any instructions from your bank. If the fee is being taken from your investments we will endeavour to instruct the Provider, Platform or DFM to stop the fee within



5 working days of receiving your instructions and refund any over payment if we are unable to meet this commitment.

You may ask us for an updated estimate of your advice fee at any time and you may ask us not to exceed a given amount without checking with you first.

Investment Advice Refunds

Our standard policy is that in circumstances where this agreement is terminated, a recommendation is not followed through to implementation, or a product arranged is cancelled at any time, no refunds will be given, and all work undertaken will be billable and due. Please note that this does not affect your statutory rights or ability to complain.

If you cancel your investment(s) in the cooling off period or stop regular contribution payments the fee will no longer be due unless a minimum fee is stated in this Terms of Business and your Adviser Charging Agreement/ Authority to Proceed.

Language

Unless agreed by us at outset all communication will be completed in English. We will communicate in a manner that is convenient to you, this could include Face-to-Face meetings, Post, E-mail and by telephone using the contact details above.

Location of Advice

All advice will be conducted in the UK. We do not have permissions to give advice when either you or I are located in any location outside the UK.

Timing of Written Advice

Financial Planning: I will send you a Suitability Advice Report setting out the reasons for my recommendation at the time of my recommendation and where applicable before implementing any advice that I have recommended.

Protection Advice: I will send you a Demands and Needs statement setting out the reasons for my recommendation before the policy starts. If I am advising you by telephone, and the policy starts on the same day the Demands and Needs statement will be sent by the end of the next working day.

VAT

The service we provide is described as an 'intermediation' service. This means we provide advice with the intention of acting between you and a product provider to arrange a financial product or service. If we did not do this, we would be liable for VAT on the fees charged. VAT is not applicable on the fees we charge for intermediation services. In arranging the sale of retail financial products an adviser fee made for advice, even if you decide not to proceed with the purchase of the recommended product, will remain VAT free where the adviser has provided you with full advice services up to that point, including all relevant documentation.

The adviser fee made for an ongoing service is also VAT free provided it is in respect of an intermediation service. This means activities such as topping up an investment or utilising available investment tax allowances, such as the ISA allowance. In the event that the advice services we provide become ancillary to our intermediation

services, VAT may become chargeable (e.g. we review your entire financial circumstances but make no or limited recommendations).

Should this change in the future, and where VAT becomes due, we will notify you before conducting any further work. In any case, where VAT is payable on our services it will be charged in addition to the agreed fee.

However, where a Discretionary Fund Manager (DFM) forms part of a solution, then VAT may become chargeable.

Declaration of Other Interests

To ensure that client interests are always put first, we operate a robust Conflict of Interest and Inducements Policy. If a potential conflict of interest does arise it will be actively managed, and we have arrangements in place to ensure that all our clients are treated fairly. If we feel that our interests conflict with yours, you will be contacted, and we will obtain your consent to proceed. Our full conflict of interest policy is available on request.

Minor Non-monetary Benefits

We are not able to receive or retain any inducements from a product provider. Should we receive any additional fee, commission or monetary or non-monetary benefit as a result of a recommendation made to you, we will return this to the product provider or transfer it to you (as appropriate) and attempt to stop further payments or inducements being received.

Addressing Financial Crime

All transactions relating to the services provided by us are covered by The Money Laundering, Terrorist Financing and Transfer of Funds Regulations 2017. The FCA also requires that we have appropriate measures in place to prevent the furtherance of financial crime.

Our responsibilities include but are not limited to verifying the identity and address of our clients and any third-party making payments on their behalf. If required you must supply proof of your identity in accordance of the above Regulations. Identity verification checks may include electronic searches of the electoral roll and the use of credit reference agencies, which will result in a soft 'footprint' on your credit records.

This footprint is not visible to other financial service providers and does not affect your credit rating in anyway. In accordance with the Data Protection Act 2018 acceptance of these terms and conditions represents your permission for us to access this information.

Financial Services Compensation Scheme (FSCS) Current Limits

We are covered by the FSCS. You may be entitled to compensation from the scheme if we cannot meet our obligations. This depends on the type of business and the circumstances of the claim. i.e. it differs for investments, insurance, mortgages and bank accounts.

Further information about compensation scheme arrangements including the conditions governing compensation and the formalities which must be completed to obtain compensation is available from the FSCS via its website at www.fscs.org.uk



The Law That We Operate Under

All of our agreements provided are governed and construed in accordance with the laws of England and Wales. In relation to any dispute, for your protection you agree to submit to the non-exclusive jurisdiction of the English courts.

Data Protection

The personal information you provide will assist your financial adviser in offering you the best advice as required by the Financial Services and Markets Act 2000. The personal data you provide will be used and stored in accordance with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR) under UK law. Before collecting any data from you, you will be issued with a Privacy Notice, which will explain in full how we collect, process and store your personal data as well as the purposes for which we require your personal data under the relevant UK laws, and you will be asked to agree to the collecting, storing and use of your Personal Data and any Special Category Data for the purpose of providing advice.

Privacy Notice

Comet Wealth Management and Comet Wealth Ltd are the joint data controllers of any personal data you provide to us in accordance with these terms of business and any further information which you provide to us during our relationship with you.

Comet Wealth Management and Comet Wealth Ltd each have a legal obligation to comply with applicable data protection legislation. Information on our uses of your personal data is set out in your Advisor's Privacy notice which can be accessed on their website or on request.

We will collect and use your personal data such as your name and contact details and other information for the

provision of financial advice and to provide you with financial products or services, including related services such as administration, risk assessment, fraud prevention and regulatory purposes.

In order to provide these services, we may share the personal data you provide with, third parties such as other advisors, product and service providers, administrators of a scheme relating to your investment plan, and third-party companies providing administration services. We may also need to share it with HM Revenue and Customs and our regulators such as the Financial Conduct Authority or the Prudential Regulation Authority in certain circumstances.

Your Rights and How to Contact Us

For further information on how we use your personal data and your rights in relation to your personal data, please see your Advisor's Privacy Notice which can be provided on request.

Should you have any enquiries relating to the personal data that we may hold about you, how your personal data is processed, or how to exercise your rights you can contact our Data Protection Officer, at support@cometwealth.co.uk

Accessibility

Please note that a paper / hard copy of this document is available, upon request.

If you would like this document or any other document in an alternative format e.g. Braille, Clear and Large Print or Audio documents (Cassette, CD, MP3 or Wav) or any other languages please let me know.

1) Service and Terms of Business

Client 1: I have read the Comet Service Guide and Terms of Business and would like to engage Comet for its process of quality advice and adopt your Ongoing Servicing and Support service as outlined on page 5.

Name:

Signature:

Date Signed:

Client 2: I have read the Comet Service Guide and Terms of Business and would like to engage Comet for its process of quality advice and adopt your Ongoing Servicing and Support service as outlined on page 5.

Name:

Signature:

Date Signed:



Customer Privacy Notice

At Comet Wealth we respect your privacy and the confidentiality of your personal information.

This Privacy Notice Explains:

- Who we are
- What personal information we collect
- How we use your personal information
- Who we share your information with and why
- How we keep your information secure
- Your rights
- How to contact us

Who We Are

Comet Wealth provide financial planning solutions and advice through experienced and qualified advisers based in the UK.

Comet Wealth determines the purposes and means of processing personal client data relating to giving advice. This means we're data controllers for these core advice giving activities and therefore responsible for managing this client data and ensuring compliance.

What Personal Information We Collect

Personal information includes your name, address, or phone number and other information that isn't otherwise publicly available. We collect personal information about you when you contact us about products and services, visit a financial planner, visit a website we may have or register to receive one of our newsletters (if applicable).

The type of personal information we collect will depend on the purpose for which it is collected and includes:

- Contact details
- Information to verify your identity
- Family, lifestyle, health and financial information
- Payment details

We collect personal information directly from you. For example, we ask for personal information at the start of our relationship and in subsequent communications, in order to check your identity and protect you from fraud. This is a legal requirement and is important to help safeguard you against potential crime.

Special Category Information

In some instances, it is necessary to collect more sensitive information (such as health or lifestyle information) which is called special category data. This is to allow us to provide our financial advice service to you. We will always obtain your consent during the advice process to gather this data and explain what information we require and why it is needed. Sensitive personal information will always be processed and stored securely. You can withdraw your consent at any time to us processing this data, however, this may mean that you can no longer access the service or product the information was gathered for.

Data Retention

We keep your personal information only as long as is necessary for the purpose for which it was collected and to meet regulatory or legislative requirements. Personal information will be securely disposed of when it's no longer required, in accordance with our Data Retention and Disposal Schedule. A copy of this is available using the contact details below.

On What Basis Do We Collect Data?

The processing of your personal data is allowed under a number of lawful bases. The data required for the provision of products and services is processed on the basis there's a contract with you to do so. Any relevant marketing activity we undertake is done because, as a firm, we have a legitimate interest to do so. However, you have rights, as listed below, which impact how we can use and process your data.

How We Use Your Personal Information

We process your information in order to support and maintain our contractual relationship with you and to comply with legal and regulatory requirements. This includes the following:

- Providing our advice, products or services to you
- Carrying out transactions you have requested
- Confirming and verifying your identity for security purposes
- Credit scoring and assessment, and credit management (where applicable)
- Detecting and preventing fraud, crime, money laundering or other malpractice.

We also process your data for specific business purposes to enable us to give you the best products and services and the best and most secure experience. For example, we process your information to send you marketing that is tailored to your interests.

Our business purposes include the following:

- Enhancing, modifying, and personalising our services for the benefit of our customers
- Providing communications which we think will be of interest to you
- Market or customer satisfaction research or statistical analysis
- Audit and record keeping purposes
- Enhancing the security of our network and information systems.

You have the right to object to this processing if you wish, please see "YOUR RIGHTS" section below. Please bear in mind that if you object this may affect our ability to carry out the tasks above for your benefit.

We may also process your personal data as part of an acquisition or sale. Should this happen, you will be notified about any change to processing or data controller arising as a result of this activity.

Who We Share Your Information With and Why

We share your information with trusted third parties who perform tasks for us and help us to provide the services you require these include:

- Comet Wealth Ltd;
- Other adviser firms for advice in areas we do not cater for;
- Third parties to verify your identity, in line with money laundering or other requirements (this may involve carrying out checks with credit reference databases);
- Third parties who perform tasks for us to help us set up or service your plan (these third parties may be based in countries outside the European Economic Area (EEA) but where they are, we'll undertake an assessment of safeguards in place);
- Other organisations, including regulatory bodies, the police and fraud prevention agencies, to prevent and detect fraud;
- Third parties where required by law, court order or regulation; and
- Third parties as part of an acquisition or sale.



How We Keep Your Information Secure

We're committed to ensuring the confidentiality of the personal information that we hold and we continue to review our security controls and related policies and procedures to ensure that your personal information remains secure.

When we contract with third parties, we impose appropriate security, privacy and confidentiality obligations on them to ensure that personal information is kept secure.

If we work with third parties in countries outside the EU, we ensure these are countries that the European Commission has confirmed have an adequate level of protection for personal information, or the organisation receiving the personal data has provided adequate safeguards.

Your Rights

Comet Wealth tries to be as open as it can be in terms of giving people access to their personal information and therefore have outlined your rights below. This privacy notice was drafted with brevity and clarity in mind, therefore further information can be gathered by contacting us using the details below, or more information about your data protection rights can be found here: <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

Marketing

You have the right to opt out of receiving marketing information and tell us what your communication preferences are by contacting Comet Wealth using the details provided at the end of this notice or by using the opt out option below or on any email marketing. You may opt out at any time if you don't want to receive any further communications of this nature.

Individual Data Rights and Requests

- The right to be informed – You can request that we provide 'fair processing information', typically through this privacy notice;
- The right of access – You may request a copy of the personal information we hold about you using the contact details found on the end of this privacy notice;
- The right to rectification – The accuracy of your personal information is important to us. You have the right to ask us to update or correct your personal information;
- The right to erasure – You may request the deletion or removal of personal data where there's no compelling reason for its continued processing;
- The right to object – You may object to the processing of your data based on legitimate interests;
- The right to restrict processing – You have a right to request we 'block' or suppress processing of your personal data;
- The right to data portability – You may request to obtain and reuse your data; and
- The right not to be subject to automated decision-making including profiling.

If you wish to correct, restrict, delete or make changes to your personal information, or any of the data subject rights listed above, please contact us at the number/address listed below.

How To Contact Us

If you have questions about this notice, need further information about our privacy practices, or wish to give or withdraw consent, exercise preferences or correct your personal information, please contact us using the following details.

The Office of Data Protection,
Comet Wealth Ltd
Hurdcott Barn, Cricket Hill Lane,
Yateley, Hampshire GU46 6BB
Telephone: 01252 626200

How To Complain

If you wish to raise a complaint about how we have handled your personal data, you can contact The Office of Data Protection who'll investigate the matter.

If you're not satisfied with our response, or believe we're not processing your personal data in accordance with the law, you can complain to our regulator:

Information Governance Department
Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF
Telephone: 0303 123 1113 Website www.ico.org.uk/concerns

3) Gathering Special Category Data and Marketing Consent

As detailed previously, in some instances, it is necessary for us to collect more sensitive information (such as health or lifestyle information) which is called special category data. This is to allow us to provide our financial advice service to you. This is where we need to gather your consent to the collection and processing of this data. You can withdraw your consent at any time to us processing this data, however, this may mean that you can no longer access the service or product the information was gathered for.

By ticking this box you are giving consent for special category personal data to be collected and stored in order for your adviser to provide you with a tailored advice service.

Marketing Consent – I, hereby grant Comet Wealth Ltd permission to process my personal data for the purpose of marketing. By providing your consent, you agree that you have given your express permission for us to market you regarding products and services that we think may be of interest to you and by any means of communication that is suitable at the time.

Name:

Signature:

Date signed:

Name:

Signature:

Date signed:

IMPORTANT NOTES: Marketing By Our Firm

If you do not indicate your agreement for us to make contact with you, we may be unable to provide you with details of products and/or services that may suit your needs and circumstances.

We would like to maintain a record of your express consent for us to contact you by post, telephone, SMS, email and instant messaging* for marketing our products or services that we think may be of interest to you.

*Whatsapp or similar service



Client Resources

Key Guides

Comet Wealth produce a series of Key Guides to address complex issues in a way that is simple and easy to understand. They are regularly updated, highly informative and free to download from our website:

cometwealth.co.uk/resources/key-guides

The full series is shown opposite – to download please click on the cover.

Newsletter

Comet Wealth's monthly newsletter, *Financial Health*, is emailed direct to clients as part of our ongoing service.

Briefing Notes

These are produced on an adhoc basis as required and focus on a single subject. They are emailed direct to clients as part of our ongoing service.

Website

As well as the Key Guides our website contains other useful client resources such as calculators, videos and blog.

cometwealth.co.uk



[Investment planning and asset allocation](#)



[Financial protection for you and your family](#)



[Business succession planning](#)



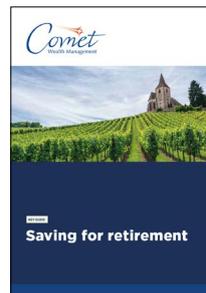
[Investing for Children](#)



[You and yours – estate planning](#)



[Investing tax-efficiently](#)



[Saving for retirement](#)



[Taking income at retirement](#)



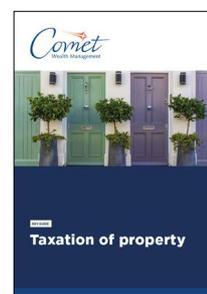
[Pensions and tax planning for high earners](#)



[Later life planning](#)



[Making the most of ISAs](#)



[Taxation of property](#)



[Making the most of ISAs](#)

Contact Details

Yateley Office

Hurdcott Barn, Cricket Hill Lane, Yateley, Hampshire, GU46 6BB
T 01252 626200

E support@CometWealth.co.uk

