# AIM FOR INTERGENERATIONAL TAX PLANNING & GROWTH

**Vermeer Partners AIM Inheritance Tax Portfolio** 



### FOR UK INVESTORS ONLY

The Vermeer Partners AIM Inheritance tax (AIM IHT) Portfolio invests in smaller companies that are deemed high risk. You may not get back the full amount you put in.

The benefit of tax relief depends on individual circumstances. Tax treatment may change in the future.

Qualification for Business Relief depends on the portfolio companies maintaining their qualifying status, which is assessed by HMRC at the point a claim for the relief is made. The portfolio must have been held for a minimum of two years and still held at the point of death.

Past performance is not an indicator of future returns. Performance history can be viewed on page 16.

The key risks associated with this service are explained in full on page 21 of this brochure. It is important that you read and fully understand the risks involved before deciding whether it is right for you.

Vermeer Partners cannot give advice on legal or taxation matters. We always recommend you talk to a qualified financial adviser before making any investment decision and that your will is drafted correctly to benefit from the available IHT reliefs including Business Relief.

All data and factual information within this document is provided by Vermeer Partners and is correct at January 2024, unless stated otherwise.

Vermeer Partners is a trading name of Vermeer Investment Management Limited registered in England & Wales (Company Number 09081916) with registered office address: 130 Jermyn Street, London SW1Y 4UR and authorised and regulated by the Financial Conduct Authority (FRN: 710280).



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### **ABOUT US**

Vermeer Partners' works closely with Fundamental Asset Management (FAM) to benefit from their research, AIM-expertise and stock picking and performance track record since 2004, in order to provide our clients with access to inheritance tax planning via this Account.

We believe in investing in high quality, cash generative, profitable, growth companies, preferably where the management of these companies' interests are aligned to those of our clients through them holding substantial equity stakes.

We have seen many changes and the considerable evolution of the AIM market since 2004: the abolition of stamp duty on share purchases and the market shrinking from over 1,700 companies at its peak in 2007 to around 850 today. We have seen many companies come and go and companies grow to several billion pounds in value.

It is this experience and expertise, gained through several stock market cycles, which makes FAM one of the most successful providers of AIM IHT portfolios.



### WHAT IS BUSINESS RELIEF

Business Relief (or Business Property Relief as it was previously called) was first introduced in the 1976 Finance Act with the objective of ensuring that after the death of the owner of a family-owned business, the business could continue to survive as a trading entity, without having to be sold or broken up to pay an IHT liability.

Current UK tax law determines that investments which qualify for Business Relief can be passed on free from Inheritance Tax (IHT) provided the shares have been owned for at least two years at that time and still retained at the point of death.

### Which businesses qualify

Not every business qualifies for Business Relief, but the following categories, may benefit:

- Shares in an unquoted qualifying company, even a minority holding
- Shares in a qualifying company listed on AIM and certain other overseas stock exchanges
- An unincorporated qualifying trading business, or an interest in one a partnership, for example

### What doesn't qualify for Business Relief

You can't claim Business Relief if the company:

- Mainly deals with securities, stocks or shares, land or buildings, or in making or holding investments
- Is a not-for-profit organisation
- Is being sold, unless the sale is to a company that will carry on the business and the estate will be paid mainly in shares of that company
- Is being wound up, unless this is part of a process to allow the business of the company to carry on

This applies to certain companies on AIM, accordingly not all AIM companies qualify and some may cease qualifying at certain times. Vermeer Partners, using research provided by FAM, conducts extensive due diligence into the qualifying status of all AIM companies in which it invests for IHT planning purposes.

### Key benefits of Business Relief for estate planning

An investment in a Business Relief qualifying company can be passed down to beneficiaries free of IHT on the death of the shareholder, provided it has been held for at least two years at that time. Unlike making gifts or settling assets into trust, which usually takes seven years to become completely free from IHT.

The assets are held by our custodian and you do not lose control. This means if you need the funds for a later life event such as to cover medical procedures or pay the deposit on a grandchild's first home you can do so. This is in contrast to a trust or gifting approach where the funds are given away and cannot be used by you if needed in the future.

Business Relief qualifying investments do not use the nil-rate band. This means you can plan for your nil-rate band allowance to reduce the IHT charge on less liquid assets, such as your home, which are otherwise difficult to place outside the estate for tax purposes.



# WHO CAN BENEFIT FROM A VERMEER PARTNERS AIM IHT PORTFOLIO?

The Vermeer Partners AIM IHT Portfolio is designed for individuals whose estate is expected to be valued in excess of the nil rate band for IHT.

There are many client scenarios which can benefit from a Vermeer Partners AIM IHT account:

- If you have an IHT issue on your remaining assets after exhausting your nil rate band you can potentially use our Vermeer Partners AIM IHT Portfolio to mitigate 100% of your potential IHT bill
- If you are looking for IHT mitigation sooner rather than later, you can use our Vermeer Partners AIM IHT
  Portfolio to obtain 100% relief from IHT after two years and not seven, as is the case with a Trust or a gifting
  approach
- If you want to pass assets to loved ones without the costly IHT bill but do not want to lose control of your assets, then you can achieve 100% mitigation from IHT and retain ownership and control of your money through a Vermeer Partners AIM IHT Portfolio
- If you have sold a Business Relief qualifying business in the last three years you can retain the Business Relief benefit without resetting the two-year clock by reinvesting into a Vermeer Partners AIM IHT Portfolio
- If you are an attorney under a Lasting Power of Attorney, you can invest into a Vermeer Partners AIM IHT Portfolio on behalf of the grantor as direct holdings are deemed in the best interest of the client. This contrasts with a Trust or gifting approach which requires Court of Protection approval





### IHT PLANNING WITH AIM

AIM qualifies for some of the most generous tax benefits available to UK investors making it an essential tool for intergenerational tax planning.

Currently, the first £325,000 of an individual's estate is IHT free. Anything above this will be taxed at 40%. This is an issue for many and if you are in this situation you should seek your own professional financial advice or speak to Vermeer Financial Planning who can advise on this and a range of other inheritance planning options.

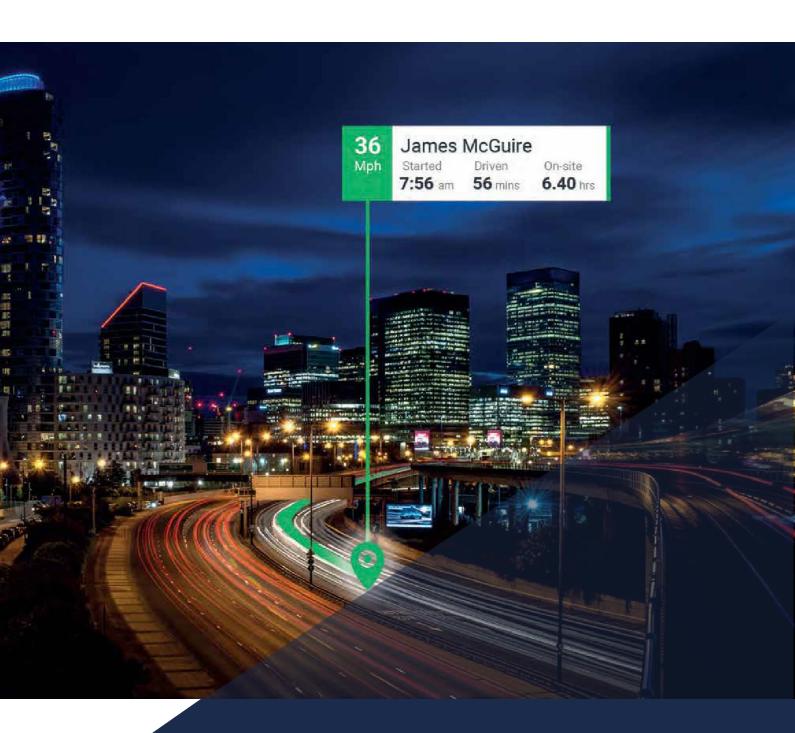
The Vermeer Partners AIM IHT Portfolio is designed to help mitigate a potential IHT bill by investing in companies listed on AIM and benefiting from full IHT relief after just two years.

### IHT

Under legislation introduced in 1996, individual investors in qualifying AIM quoted companies benefit from the rules on Business Relief as AIM shares are designated "unlisted". Investment in the shares in 'qualifying' AIM quoted companies held for two years and until death gain 100% relief from IHT.



# AIM FOCUS



Quartix was established in 2001 and is a leading supplier of subscription-based vehicle tracking systems, software and services in the UK.



# INTRODUCING THE VERMEER PARTNERS AIM IHT PORTFOLIO

IHT planning is not only for those with high net worth. It is a tax which is paid by thousands of people in the UK every year. But it is avoidable with a good IHT plan. That is why we would recommend you speak to Vermeer Financial Planning or a financial adviser before making any investment decisions.

The Vermeer Partners AIM IHT Portfolio has the objective of obtaining 100% relief from IHT, as well as the potential for capital appreciation, by investing into qualifying AIM quoted companies. The Vermeer Partners AIM IHT Portfolio is an effective, proven and non-contentious tax planning method which avoids the costs, administration and loss of control associated with forming a trust or gifting.

### **Growth potential**

Holding a Vermeer Partners AIM IHT Portfolio means you will benefit from the growth opportunity AIM presents as one of the most successful growth markets in the world.

### **IHT** mitigation

A Vermeer Partners AIM IHT portfolio achieves 100% mitigation from IHT after only two years, not seven years as is the case through a gifting or trust approach.

### Retain access to your assets

Holders of a Vermeer Partners AIM IHT portfolio retain assets in their own name which means you will not lose control of your assets and have the freedom to redeem some, or all, of your holdings at any time.

### **Risks & benefits**

- Effective inter-generational tax planning strategy
- There is no annual maximum investment amount and it can be held as a joint account. Parties to a joint account are treated as joint beneficial tenants. This means should one spouse die, the portfolio will pass to the surviving spouse in full
- A cost effective and viable alternative to trusts, insurance products and gifts with wider and more generous tax breaks
- Retention of control and access to your money
- FAM expertise
  - o 18-year track record
  - o Proven investment approach
  - Unrivalled knowledge of AIM
  - o Dedicated and focused team
  - o Track record of outperformance versus the AIM benchmarks
- Many AIM companies are young with a relatively undeveloped business or track record
- Ability to obtain full IHT relief in a short two-year period
- A straightforward, fully transparent and non-complex investment solution
- Conservative stock picking approach
- Some (AIM-listed companies) are run by inexperienced managers
- Some (AIM-listed companies) are little more than a great idea in search of some capital to develop them



# USED UP YOUR ISA ALLOWANCE BUT STILL LOOKING TO SAVE INHERITANCE TAX?

The Vermeer AIM Inheritance Tax Portfolio is available to investors both inside and outside an ISA.

The annual ISA allowance for an individual is £20,000 which can be lower than the assets some clients are looking to protect from Inheritance Tax. To help with this we offer a General AIM Inheritance Tax account which is managed in the same way as our ISA account but outside an ISA wrapper.

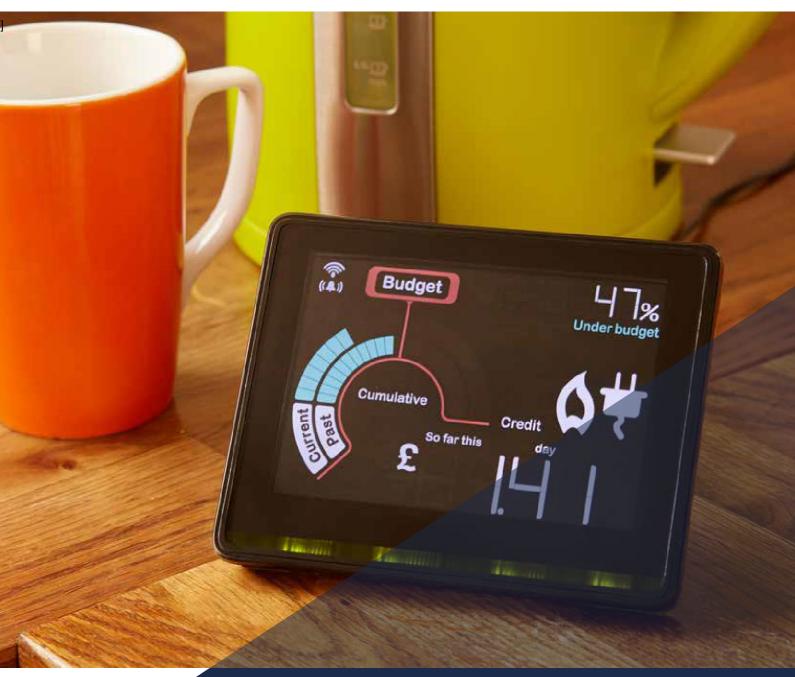
Not all client wealth is contained in an existing ISA. You may have more than is permittable to be put into an ISA for the current year. That is when our General AIM Inheritance Tax account is helpful as it lets you obtain 100% mitigation from Inheritance Tax on any sums outside your permittable ISA allowances.

A General AIM Inheritance Tax account is slightly more flexible than an ISA. There is no annual maximum investment amount and it can be held as a joint account. Parties to a joint account are treated as joint beneficial tenants. This means should one spouse die, the portfolio will pass to the surviving spouse in full.



# AIM FOCUS

Smart Metering Systems plc



SMS plc funds, installs, operates and manages smart meters and carbon reduction assets, including EV chargers and battery storage systems, which facilitate a smarter, greener and more flexible energy system.



### HOW DOES IT WORK?

The easiest way to show you how a Vermeer Partners AIM IHT Portfolio can help you and your family's IHT planning is to use an example.

Hilary is 80 years old whose partner has already died. Her home is worth £1 million and she has a portfolio of stocks and shares which has built up over several years valued at £360,000. She intends to leave all her wealth to her three children.

The current (2023/2024) IHT nil rate band is £325,000 and the residential nil rate band is £175,000 amounting to a total of £500,000. Hilary also benefits from her late spouse's residential nil rate band, lifting this to a combined £1 million.

This means Hilary can leave the home to the children free of IHT which would use up the total IHT-free amount. This leaves the £360,000 share portfolio which would be liable to IHT and potentially leave the beneficiaries with a £144,000 IHT bill.

Hilary takes financial advice and her financial adviser recommended transferring 50% (£180,000) of the portfolio into a Vermeer Partners AIM IHT account.

Hilary's financial adviser explained the straight forward account opening process and Hilary now holds two portfolios of listed investments, one of which is invested in shares of qualifying AIM quoted companies, managed by Vermeer Partners. After Hilary has held the AIM shares for two years, they will qualify for 100% IHT mitigation and the beneficiaries will not incur a large IHT bill and will instead save £72,000.

Hilary will retain access to the Vermeer Partners AIM IHT investment and can make withdrawals without affecting the Business Relief status of the remaining AIM shares.



### STOCKS & SHARES ILLUSTRATION

What is the impact on IHT of leaving half of Hilary's stocks and shares portfolio in main market stocks compared with moving it to AIM stocks using the Vermeer Partners AIM IHT Portfolio?

	Hilary doesn't do anything	Hilary moves the TSA to a Fundamental AIM Inheritance Tax ISA Portfolio
Gross Investment	£180,000	£180,000
Dealing Fees AIM Portfolio of 25 positions; each position £35	£0	-£875
Amount remaining after initial costs	£180,000	£179,125
Annual Management charges at 1.25% + VAT over 2 years (in case of do nothing fee assumed to be 0.75%)	£3,471	£5,739
Value of Investments after 2 years assuming 5% growth each year	£194,894	£191,605
Amount lost through Inheritance Tax on death at 40%	£78,666	£0
Value of inheritance passed on to beneficiaries	£116,228	£191,605

#### What happens after I die?

We are experienced in dealing with solicitors, executors and beneficiaries with any information they might need following your death. We will assist your executors and advisors in the probate process by providing the necessary information need to complete the relevant IHT forms to HMRC.

Executors have the option to sell the investment and pass proceeds to beneficiaries; retain the investment for the benefit of the beneficiaries; or use the portfolio to pay any IHT owed from other investments. We would recommend beneficiaries seek independent financial advice before making any decision and can offer this service via Vermeer Financial Planning.



### THE VERMEER PARTNERS INVESTMENT APPROACH

Your portfolio will hold a basket of AIM stocks with strong potential for capital growth and which potentially qualify for 100% IHT mitigation through Business Relief.

The Vermeer Partners AIM IHT Portfolio is a discretionary managed portfolio service comprising 20 to 30 holdings of potentially Business Relief qualifying AIM quoted companies.

Portfolios are well-diversified and balanced across holdings and sectors. We adopt what is known as a core/satellite approach which means we have a core selection of companies we like to use for each portfolio and a smaller satellite selection which we will consider depending on the details of a particular portfolio. We will not hold a position in a company which exceeds 10% of the total value of the portfolio or 5% on initial investment.

We generally look to invest in better-established companies on AIM which potentially qualify for Business Relief and have a business model which has been proven over time.

The result is that your portfolio is suitably diversified by name and sector, which helps to reduce risk. It also helps us manage liquidity which means you should not have to wait long to retrieve your money should you wish to disinvest from your holdings.

### We regularly review our positions for Business Relief qualification

We review our own portfolio holdings and others in the wider market on an ongoing basis.



### WHAT BUSINESS FUNDAMENTALS DO WE LOOK AT?

The investment process starts with an initial stock screening.

The objective of this initial screening process is merely for idea generation and does not, alone, constitute a reason to invest. Idea generation is not restricted to only the screening process. Industry publications, investor magazines can be a source as is one company leading to another.

Once the screening process has generated some ideas, the next stage of the process is to analyse the strategy of the business and to gather as much information as possible on what the company is trying to achieve/sell. This may include products, manufacturing, sales targets, operation of sales outlets, customers. This information is generally found on their website or in related publications.

Stage three is analysis of the financial statements and to gain a clear understanding the balance sheet, P&L and cash flow statements, with particular emphasis on the latter. Any areas that are not clear are highlighted in preparation for the meeting with management of the company.

If our findings are satisfactory, then we will arrange a meeting with the management of the company. However, we have become increasingly sceptical of the benefits of meeting senior management. On occasions this adds value but on others it can prove a distraction and management can tend to downplay any underlying issues within the business. Notwithstanding, generally speaking we will not take a position to core size until we have met with senior management, often at their place of business.

Once the portfolio is constructed, Vermeer Partners manages it on an ongoing basis, replacing holdings as necessary if they are no longer considered to offer compelling long term investment potential, or if they are in danger of losing their qualification for exemption from IHT. Active management of AIM IHT portfolios is allowed but must be done within certain rules. Expected turnover levels are very low but regular monitoring of holdings continues for the life of the portfolio.



# AIM FOCUS



Gamma is a leading provider of Unified Communications as a Service into the UK, Dutch, Spanish and German business markets, supplying communication solutions directly and through their extensive network of trusted channel partners.



# ONE OF THE MOST SUCCESSFUL GROWTH MARKETS IN THE WORLD

AIM has some of the most generous tax benefits of any listed market. But tax is not the only reason to invest in AIM. AIM is also one of the world's most successful growth markets for ambitious fast-growing smaller companies.

It is true that investing in smaller companies involves risk. However, it also creates opportunity for long-term growth. Investing in smaller companies can produce upside growth potential that is rarely seen in the main UK stock market.

AIM was launched by the London Stock Exchange in 1995 and is home to over 850 companies. With a combined market capitalisation of over £130 billion, AIM gives investors the opportunity to invest in high-growth businesses across different sectors and industries.

There is a misconception that AIM is only for start-ups. AIM has many well-established companies dating back over 100 years with market capitalisations over £1 billion and which would gain entry to the FTSE100 and FTSE250 Index. AIM has an abundance of high quality and profitable businesses with strong growth and earnings prospects, organic cash generation and minimal debt. Many of the business on AIM have significant family and founder ownership and balanced management remuneration arrangements.

AIM is a stock pickers market. Large companies on the main UK stock market are covered by hundreds of analysts and professional investors around the world. AIM is a market which receives less focus and means there is greater scope for our investment team to find hidden value and where our well-honed expertise and skill in smaller companies investing can see great rewards.



# VERMEER PARTNERS AIM IHT PORTFOLIO PERFORMANCE

The table below shows the performance of the FAM AIM Inheritance Tax Portfolio against key comparators:

	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023
FAM	55.06	5.10	21.99	9.94	27.51	-10.81	21.62	7.73	14.67	-26.58	-4.28
AIM Market	20.29	-17.48	5.25	14.29	24.30	-18.20	11.61	20.74	5.17	-31.69	-8.18
UK Large Companies	14.43	-2.71	-4.93	14.43	7.63	-12.48	12.10	-14.34	14.30	2.67	2.00

### Performance of the FAM AIM Inheritance Tax portfolio against key comparators:



The performance is shown alongside the return of the AIM market and 100 largest companies in the UK main market. Performance has been calculated by using a representative FAM AIM Inheritance Tax portfolio. Figures have been calculated net of a 1.25% management fee and transaction costs.

Your AIM IHT portfolio will be managed by Vermeer Partners based on research provided by the two founders of FAM, Chris Boxall and Stephen Drabwell. Chris and Stephen are experienced investment managers who have been managing the portfolios in-house since 2005 and since inception in 2004. Chris and Stephen conduct all research supported by external analysts (former fund managers, private investors and business people).

Stephen Drabwell is a co-founder, major shareholder and director of FAM. Stephen oversees the trading, asset allocation and operational aspects of managing the Vermeer Partners AIM IHT portfolio. Prior to founding FAM, Stephen started his career at the investment bank, UBS in 1990. Following nine successful years at UBS, which saw him progress to becoming a sales trader on the European portfolio trading desk, Stephen joined Washington Asset Management where he was senior trader for a US Long/short hedge fund. Stephen helped grow the fund from \$30m to \$250m before leaving in 2004 to start FAM.

Christopher Boxall is a co-founder, major shareholder and director of FAM. Chris qualified as a Chartered Accountant in 1989 and has primary responsibility for company research and portfolio management for the firm's equity portfolios, with particular focus on AIM. Prior to FAM, Chris oversaw activities at the Washington Financial Group, where he was a key member of the investment management team of the Washington US Fund Ltd, a successful equity fund.



# OUR FEES & CHARGES

The Vermeer Partners AIM IHT Portfolio is one of the most competitively priced products in the market. A breakdown of our investment management costs is below.

Vermeer Partners Annual Management Fee:	1.25% + VAT
Vermeer Partners Dealing Fee:	£35 per trade



# AIM FOCUS





### FREQUENTLY ASKED QUESTIONS

### When does the two-year holding period start?

The two-year holding period required for an investment to receive exemption from IHT is from the date we invest your money in qualifying shares. Once funds have cleared, we will endeavour to invest as soon as reasonably practicable. Please note, after those two years you must continue to hold the investment until your death for the IHT relief to apply.

#### Can I make withdrawals?

You can take your money out of your portfolio whenever you need to by contacting us. Money withdrawn may lose tax benefits and could form part of your taxable estate at death. We do not apply a minimum withdrawal amount.

### How can I access my account and see my portfolio?

If you are invested with us directly, you will have access to your own online portal which is secure and available anytime and where you can see your full portfolio holdings with up-to-date valuations. Direct clients, will also receive a quarterly report after each calendar quarter from us, detailing current portfolio positions and valuations as well as a commentary. Copies can be sent to your financial adviser. We prefer to send these electronically but they can be sent in the post on request.

### How can I sell my shares and how long will I have to wait for settlement?

If you wish to sell all or some of your shares we can do this for you as soon as is reasonably practicable following an instruction. One of the benefits of our AIM portfolios is that they are designed to reduce liquidity risk. This means we can usually sell a position within a few days.

### What is the minimum investment?

We have a minimum investment of £100,000.

### Does the portfolio pay any income?

We take the view that AIM is a market for growth. As such we do not pay out any income, and dividends received are retained in the portfolio to meet ongoing costs. However, regular capital withdrawals can be facilitated.

### Is Vermeer Partners part of the Financial Services Compensation Scheme?

Vermeer Investment Management Ltd is part of the Financial Services Compensation Scheme (FSCS). The FSCS is the compensation fund of last resort for customers of financial services organisations. If an organisation goes out of business, investors can make a claim to the FSCS for any losses resulting from the organisation's bad investment advice, negligence or mis-selling. It is important to understand that the FSCS does not protect against, or compensate for, losses from poor performance, such as when shares in a company have reduced in value.



# AIM FOCUS



mixers for alcoholic spirits. It sells carbonated mixers to hotels, restaurants, bars and cafés as well as supermarkets and off-licences for retail purchase.



### UNDERSTANDING THE RISKS

It is important that you understand the risks and are comfortable with these. We recommend you speak to a financial adviser or Vermeer Financial Planning before making any investment decisions.

#### Capital at risk

Past performance is not a guide to future performance and may not be repeated. The value of an investment in a Vermeer Partners AIM IHT Portfolio can go down as well as up and an investor may not get back the full amount invested.

#### Small cap investing can be volatile and shares could be difficult to sell

Investment in smaller companies quoted on AIM is generally higher risk than investment in larger, more established companies. As a result, the performance of a Vermeer Partners AIM IHT Portfolio that is solely invested in companies quoted on AIM may be more volatile than a portfolio that is solely invested in companies that are listed on the London Stock Exchange Official List. The investments included in a Vermeer Partners AIM IHT Portfolio may not always be readily realisable and their marketability may be restricted. As a Vermeer Partners AIM IHT Portfolio will invest in a comparatively small number of companies, it may be more volatile than portfolios that are more diversified.

#### Tax treatment may change

Our service is based on current tax legislation which could change in the future. Tax relief depends on the companies we invest in maintaining Business Relief-qualifying status. Tax treatment depends on individual circumstances which could change in the future.

### Business Relief is assessed on a case-by-case basis

We cannot guarantee that the investments we make will qualify for Business Relief in every case in the future. HMRC will only conduct assessment after the death of an investor, to confirm whether the companies invested in qualify at that time.



# HOW TO INVEST

We recommend you speak to a financial adviser before making any investment decisions. Your financial adviser can help you with the application process and answer any questions you might have on whether the investments are suitable for you. At Vermeer Partners, we cannot offer legal or tax advice.

We are happy to talk further with you to see how Vermeer Partners can help you with your IHT planning. If this is something you wish to discuss please contact your Investment Director or a member of your usual Vermeer Partners team. If you just want to find out more about your inheritance planning options, then Vermeer Financial Planning would be delighted to speak to you.





James Halstead plc is a significant manufacturer on the world stage for commercial flooring and has been manufacturing successfully since 1915 with the group's flooring products being installed across the globe. In 2006 the Company received recognition for ongoing achievement in international trade through the Queen's Award for Enterprise.



### IMPORTANT INFORMATION

Investment in a Vermeer Partners AIM IHT Planning Portfolio of the type referred to in this brochure may not be suitable for all investors. It is not intended that anything stated in this brochure should be construed as an offer or invitation to treat or inducement for you to engage in any investment activity. The information in this brochure relating to the management of portfolios of assets by Vermeer Investment Management Ltd is directed at United Kingdom residents only and products referred to on our website are not available to those who are not resident in the United Kingdom.

Before investing, please ensure that you have read the information set out in the account application form, which includes full details of the charges. Nothing in this document should be regarded as constituting legal, taxation, investment, or other advice and prospective investors are advised to consult their financial and /or other professional advisers before contemplating any investment in a Vermeer Partners AIM IHT Planning Portfolio.

Any references to tax laws or levels in this document are subject to change. In any event, tax treatment depends on the individual circumstances of a client.

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Fundamental Asset Management Ltd is authorised and regulated in the conduct of investment business in the United Kingdom by the Financial Conduct Authority (No 401123). Fundamental Asset Management Ltd has its registered office at Cardinal Point, Park Road, Rickmansworth, WD3 1RE. Vermeer Investment Management Ltd has a research agreement in place with Fundamental Asset Management under which AVL pays for the provision of specialist AIM IHT company research.

### **Privacy Policy**

Any information you provide to Vermeer Investment Management Limited will be used to administer your request for information from us. Occasionally, we may also use your details to inform you of other features, services and products offered by Vermeer Investment Management Ltd and its subsidiaries which we think you may be interested in and we may contact you by post, email or telephone unless you have requested us not to.

We will keep your personal information confidential except to the extent that we are compelled to disclose it by law or to comply with an instruction of a regulatory body of competent jurisdiction.

To comply with the requirements of the Data Protection Act 2018, we adhere to strict security procedures and have taken all appropriate measures to ensure that no unauthorised disclosures of your details are made to a third party without your permission and unauthorised access to it is prevented.