NORTHSTAR

Smarter Financial Planning for the Digital Age

Client Reviews & Feedback Policy

Contents

Purpose of This Policy

This policy sets out how NorthStar Wealth Management ("NorthStar", "we", "us") invites, collects, handles, and publishes client reviews and feedback. It explains our obligations under consumer protection law and financial services regulation, how we run our review incentive, how we deal with negative or disputed feedback, and the standards we hold ourselves to when displaying reviews.

It applies to all directors, employees, and anyone acting on NorthStar's behalf, and covers all channels on which reviews of our services appear, including third-party platforms and our own website.

Why Client Feedback Matters

We ask every client for honest feedback because it is the most reliable measure we have of whether our service is delivering what it should. Client reviews and survey responses allow us to:

- monitor the quality and consistency of our advice and service
- identify where we are falling short and put it right
- evidence that our clients are receiving good outcomes, as required under the FCA's Consumer Duty
- help prospective clients make an informed decision about whether NorthStar is right for them, based on the genuine experiences of people we already serve

Feedback (including critical feedback) is treated as a business asset, not a marketing exercise. We would rather hear about a problem directly and fix it than have a client leave dissatisfied.

Regulatory & Legal Framework

Digital Markets, Competition and Consumers Act 2024 (DMCC Act) and CMA guidance (CMA208)

Since 6 April 2025, fake consumer reviews and concealed incentivised reviews are banned commercial practices under Schedule 20 of the DMCC Act, enforced by the Competition and Markets Authority (CMA). Because we display client reviews and satisfaction scores on our own website, we are a 'publisher' of consumer review information under the Act. This places a positive obligation on us to take reasonable and proportionate steps to prevent and remove fake reviews and false or misleading review information, and to maintain a published policy setting out our approach, which this document provides.

FCA Consumer Duty (PRIN 2A)

Consumer Duty requires us to act to deliver good outcomes for retail clients and to monitor, evidence, and act on those outcomes. Gathering structured client feedback is a core part of our outcomes-monitoring framework. Our annual Client Satisfaction Survey, together with reviews received across third-party platforms, forms part of the management information reviewed by the directors when assessing whether clients are receiving good outcomes across the products and services, price and value, consumer understanding, and consumer support outcomes.

FCA financial promotion rules (fair, clear and not misleading)

Where we reproduce or reference client reviews in our marketing or on our website, that content forms part of our communications with clients and must be fair, clear, and not misleading. We do not edit reviews to change their meaning, present selective feedback as if it were representative, or use reviews in a way that creates a misleading impression of our service.

UK GDPR and the Data Protection Act 2018

Reviews and survey responses may contain personal data. We only publish a client's name or identifying details alongside a testimonial on our own website with their consent, and clients may withdraw that consent at any time by contacting us. Client names are typically part-anonymised, with the initial of the surname used. Third-party platform reviews are published under the privacy terms of the relevant platform. Our handling of personal data is set out in our Privacy Policy and Data Protection Framework.

Platform terms of service

Each review platform we use has its own rules on review collection and incentives. We comply with the rules of each platform individually, and where a platform's rules are stricter than the law, we follow the platform's rules on that platform.

Review Channels & Platforms

We welcome reviews and feedback through any available channel or platform. Our principal feedback and review channels and platforms are:

- **VouchedFor**. Our primary review platform. VouchedFor independently verifies reviewers are genuine clients of the firm.
- **Google.** Reviews on our Google Business Profile.
- **Trustpilot**
- **Facebook**
- **Client Satisfaction Survey**. A structured survey issued to all clients, covering multiple facets of our service (including advice quality, communication, responsiveness, value, and overall satisfaction).

We publish aggregate scores from the Client Satisfaction Survey on our website and update these annually. Published survey results reflect all responses received; we do not exclude responses to improve the published scores.

How We Invite Feedback

We have robust procedures in place when inviting clients to review our services and provide feedback.

- **We invite all clients to leave feedback.** We do not selectively approach only those clients we expect to be positive.
- **Our requests are neutral.** We ask for honest feedback on the client's genuine experience; we never ask for, suggest, or encourage a particular rating, score, or sentiment.
- **No employee, director, or associate of NorthStar may write, commission, or arrange a review of the firm, whether positive or negative, and whether of NorthStar or of any other firm.** We do not purchase reviews or engage any third party to generate reviews.
- **We never offer any benefit conditional on the content, rating, or sentiment of a review**.
- **Clients are under no obligation to leave a review**. Declining to do so has no effect whatsoever on the service they receive.

Review Incentives

To encourage participation in our feedback programme, clients who leave a review or complete our Client Satisfaction Survey during the year are entered into a prize draw held at the end of each year. The terms of the draw are as follows:

- **Entry is open to all reviewers and survey respondents, regardless of the content, rating, or sentiment of their feedback.** A one-star review carries exactly the same chance of winning as a five-star review.
- **The winner is selected at random.** No reviewer is guaranteed any benefit for leaving a review.
- **The prize changes each year and is announced in advance.**
- **The existence of the draw is disclosed openly**. This is covered within this policy, and in our feedback invitations.

This structure is consistent with CMA guidance under the DMCC Act, which distinguishes between a direct personal benefit given in exchange for a review (which must be disclosed within the review, or is banned if concealed) and a general encouragement to review, such as entry into a prize draw with no guaranteed reward, which the CMA's guidance indicates is unlikely to amount to commissioning an incentivised review.

Platform exception: Google. Google's review content policies prohibit soliciting reviews using incentives of any kind, which Google applies more strictly than the general law. Accordingly, the prize draw does not apply to reviews left on Google, and our invitations to review us on Google make no reference to the draw. Requests for Google reviews are made on a purely no-strings basis. We keep the incentive terms of other platforms under review and will adjust this policy where a platform's rules require it.

Negative Reviews & Critical Feedback

Should we receive any negative reviews or critical feedback, we use this constructively and see this as a way to improve the services we deliver.

- **We never suppress negative reviews.** We do not remove, hide, ask clients to withdraw, or seek the takedown of genuine negative reviews on any platform, and we do not dissuade any client from posting critical feedback.
- **We treat critical feedback as an opportunity to improve.** Every negative review or low survey score is reviewed by a director, and where we identify a service failing we act on it.
- **Where a client raises a concern through a review or survey response, we will normally contact them directly (where we can identify them and it is appropriate to do so) to understand the issue properly and work with them to resolve it**. Many of our most valuable service improvements have come from exactly this process.
- **Where a review discloses dissatisfaction amounting to a complaint, it is handled under our formal Complaints Procedure in accordance with FCA rules**. This includes our obligations on acknowledgement, investigation, timescales, and the client's right to refer the matter to the Financial Ombudsman Service. A client posting a review does not lose or dilute any of their complaint rights.

Reviews Believed to be Unjustified, Mistaken, or Fake

Occasionally a review may be factually inaccurate, posted in error (for example, intended for a different firm), submitted by someone who has never been a client, or otherwise fall outside the platform's own content rules. In such cases we may:

- **Post a professional, factual public response correcting the record**. This is done respecting client confidentiality and data protection obligations (we will never disclose a client's personal or financial information in a public reply, even where a review is inaccurate);
- **Report the review to the platform and request that it be investigated under the platform's own policies**. This is done where we have genuine grounds to believe it is fake, misleading, or misdirected.

We only use platform reporting mechanisms where we honestly believe the review breaches the platform's rules. We do not use them to challenge genuine reviews merely because they are critical.

Displaying Reviews & Feedback

We always display reviews and feedback fairly and transparently to ensure a fair representation is given.

- **Testimonials displayed on our website are genuine client feedback, reproduced accurately.** Where a page presents selected testimonials, it is identified as a selection, and we link to our third-party review profiles where all reviews (both positive and negative) can be seen in full.
- **We do not edit reviews other than for length, and never in a way that changes their meaning or omits material criticism**.
- **Aggregate figures we publish (such as Client Satisfaction Survey scores or platform star ratings) are calculated from all relevant responses and presented with the date or period they relate to**.
- **We take reasonable and proportionate steps, in line with our obligations as a publisher under the DMCC Act, to ensure that no fake or concealed-incentivised review information appears in material we publish**. If we become aware that any review we have reproduced is not genuine, we will remove it promptly.

Policy Governance & Reviews

We take our obligations around client feedback seriously, and this policy is subject to formal oversight to ensure it continues to reflect both regulatory expectations and how we actually operate. It is governed as follows:

- **This policy is approved by directors of NorthStar Wealth Management Group Ltd.**
- **This policy is reviewed at least annually, and additionally whenever there is a material change in relevant law, regulation, CMA or FCA guidance, or the content policies of a platform we use.**
- **All staff are made aware of this policy, and adherence to it forms part of our compliance monitoring programme.**
- **A record is kept of feedback received, actions taken in response to critical feedback, and any reviews reported to platforms, as part of our Consumer Duty management information.**

Contact & Further Questions

Further questions about this policy, requests to withdraw consent for a published testimonial or review, or concerns about any review should be directed to: The *Data Controller, NorthStar Wealth Management Group Ltd, Ocean Village Innovation Centre, Ocean Way, Southampton, Hampshire, SO14 3JZ*.

NorthStar Wealth Management

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