

Privacy notice

“We”, “our” or “us” means Close Asset Management Limited and other companies in the Close Brothers Group which includes its subsidiaries, affiliates and their respective parent and subsidiary companies (“Close Brothers Group”). For the purposes of data protection law, we are a data controller in respect of your personal data. We collect and use your personal data and where applicable this may include information related to your spouse/partner, directors, partners and owners (your “representatives”). We are responsible for ensuring that we use your personal data in compliance with data protection law.

This notice applies to any personal data we receive from you, create or obtain from other sources and explains how it will be used by us. It is important that you take the time to read and understand this notice so that you understand how we will use your personal data and your rights in relation to your personal data.

Personal data that we collect about you

What is personal data?

Personal data is information that can be used to identify you or tell someone something about you. This can include your name, date of birth and contact details. It can also include information such as your financial circumstances, your bank details and records of communications, e.g. letters, e-mails and recorded telephone conversations.

What is sensitive personal data?

Sensitive or ‘Special Categories’ of data is information related to any of the following: health, racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic or biometric data, and data regarding sexuality or sex life.

We will collect and use the following personal data about you:

Information you give us

- This is information that we record about you that you give us by filling in forms or by corresponding with us by phone, e-mail or otherwise.
- The information you give us may include your and your representatives’ name, address, date of birth, national insurance number or other tax identification number, primary and secondary nationality, e-mail address and phone number, financial information, information about your family, employment history, credit history, any other relevant biographical data that would affect the service we provide you, and identification and address verification records,
- You may also provide us with certain special category data, which includes information relating to your health.
- You must ensure that in respect of any information

you provide us with, which does not relate to you (for example, information about your spouse, partner or other family member, beneficiaries, your authorised representatives or any other individual), you have informed the individual that you have provided us with that information. You should refer them to this privacy notice before sharing their information with us or as soon as possible after providing that information.

- We record telephone conversations and video conferencing meetings in order to comply with our regulatory obligations, to resolve complaints, improve our service and for training and quality assurance purposes.
- If you take part in any interactive features of our services, for example sharing your computer screen with us, we may record the session in order to resolve complaints, improve our service and for training and quality assurance purposes. Further information regarding this, will be provided at the point of using that service.

We are required to ask you for your information in order to enter in to an agreement with you and to fulfil our regulatory obligations within that agreement. If you do not provide us with the information we ask for, we may be unable to provide you with our services either wholly or in part.

Information we generate about you

- We may use information relating to your financial affairs to assess which products and services are suitable and/or appropriate for you.
- We generate data for statistical analysis:
 - » **Website Usage Information** – Our website uses Google Analytics and Hotjar to automatically gather certain information such as the number and frequency of visitors, how they use the website and their IP addresses. This information is used as aggregated statistical information about users, providing usage by IP address. We may identify individual users from this type of data. This information helps us to measure how individuals use the website and our services, so that we can continually improve them.
 - » **Platform** – Our Platform also uses Google Analytics in the same way as our website. In addition we use data from our Platform to monitor and improve the service we provide you, regulatory reporting and to assess which products and services may be suitable and/or appropriate for you.

Information we receive from other sources

- **Fraud Prevention Agencies** – When verifying your identity, address or bank account details as part of our application and on-boarding process, we may access information recorded by fraud prevention agencies within and outside the UK. This may include information about
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any criminal convictions and any allegations regarding criminal activity that relate to you.

- **Intermediaries** – We will receive information from third party intermediaries, such as independent financial advisers, and introducers, such as law firms and accountancy firms. This information may include your personal details, contact details and details regarding your financial affairs in order for us to provide you with our products and services.
- **Social Media Profile** – If you connect with us via a social media website, such as LinkedIn, we will receive your contact information provided as part of your user profile such as your name, email address and telephone number and any other relevant business information such as your organisation's name, address and your industry.
- **Public databases** – we may obtain information about individuals from public databases, or company websites. We use reputable sources including public repositories. We employ appropriate measures to assure the quality of information which we collect.
- **CCTV** – When you visit our offices we may record your activity in our car parks or buildings by use of Closed Circuit TV (CCTV). Where we use CCTV, there will be clear and prominent notices that alert you to its use.

In offices where we share premises, CCTV may be controlled by the provider of the premises. In such circumstances the provider of the premises will be the data controller, but where required, we may ask for them to share that data with us.

- **Other members of the Close Brothers Group** – where you have provided a company within the Close Brothers Group with your consent for us to provide you with information about our products and services.

How we use your personal data

Your personal data may be used by us in the following ways:

- **Crime prevention and identity verification**
 - » **To verify your identity and address, and decide whether to enter into a client agreement with you, such as:** carrying out credit reference, anti-money laundering, terrorist financing and fraud prevention checks (which may include sharing personal data with credit reference and fraud prevention agencies to automatically carry out these checks). If we are unable to verify your name and address we will ask you for further information to allow us to do this. Details of which agency we use to verify your name and address electronically are available on request. Details of our search with the agency will be kept on their records. Any search we make will not affect your credit file.
 - » To allow us, on an ongoing basis, to detect and prevent fraudulent activity including sharing personal data with fraud prevention agencies; and
 - » To allow us, on an ongoing basis, to detect and prevent money laundering activity or terrorist financing.
- **Products and services**
 - » **To manage, administer and take decisions regarding your Account, such as:** assessing your suitability for the products and services that you have

requested or that we have recommended, providing those products and services to you, and exercising our rights and performing our obligations under our client agreement with you (e.g. buying, selling and transferring investments, receiving and paying out monies and keeping you up to date with how your investments are performing).

- » To make payments;
- » To receive monies for the purposes of advice and/or investment;
- » Where we are permitted to do so, to send promotional information about our products and services via the methods you specify (i.e. email, post, etc.); and
- » To contact you via post, e-mail or telephone in relation to the administration of your Account(s) or to carry out quality control research.
- » To deliver targeted advertisements to you and others as you browse the internet as detailed in the 'Information we generate about you' section above.

Legal basis for processing your personal data

We process your personal data pursuant to the following legal bases:

- Taking steps (at your request) prior to entering into an agreement with you, and subsequently for the administration and performance of our agreement with you;
- To comply with our legal and regulatory obligations, for example, complying with our crime prevention and anti-money laundering obligations, our HMRC or regulatory reporting obligations, or assessing the suitability and/or appropriateness of any financial planning or investment decision made directly by you, or by us, on your behalf;
- To establish, exercise or defend our legal rights and/or for the purpose of (or in connection with) legal proceedings; and
- The use of your personal data as described is necessary for our legitimate business interests which are:
 - » Enforcing the terms and conditions of any agreement we have with you;
 - » Improving customer service, market research, quality assurance, training staff, system development and statistical analysis of your personal data even if you or we subsequently decide not to enter in to a client agreement with you.
 - » To contact you about products and services that may be of interest to you.
- Where CCTV is in use, for the prevention and detection of crime, for control access and for protecting the safety of our clients and staff.

Sharing your personal data

We may disclose your personal data, including special categories of data that you have consented to us processing, within the Close Brothers Group and to third party service providers outside of Close Brothers Group in the circumstances described below:

- To ensure the delivery of products or services you have opted to receive from or through us;
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- To ensure the safety and security of our data;
- As part of our client research and statistical analysis activity;
- Providing anonymised data to third parties for statistical analysis activity (this data would not allow any third party to identify you individually);
- In order to enforce or apply the terms of use and other agreements you have with us;
- To third party product providers or their brokers;
- To any intermediary, including independent financial advisers or other authorised representative acting on your behalf;
- For fraud prevention;
- With your consent, to any other service provider for the purposes of receiving information about their services which may be relevant to you, such as an insurance company or other professional service to which we may refer you to due to your particular financial circumstances.
- If we sell any of our business or assets, in which case we may disclose your personal data to the prospective buyer for due diligence purposes;
- If we are acquired by a third party, in which case personal data held by us about you will be disclosed to the third party buyer; and
- To third party agents or contractors (for example, the provider of our online platform) for the purposes of providing services to us and to you.

These third parties will be subject to confidentiality requirements and they will only use your personal data as described in this privacy notice.

We will take steps to ensure that the personal data is accessed only by personnel that have a need to do so for the purposes described in this notice.

We may also share your personal data outside of the Close Brothers Group to the extent required by law, for example if we are under a duty to disclose your personal data in order to comply with any legal obligation (including disclosures made to our regulators, e.g. the Financial Conduct Authority or the Information Commissioner's Office, HMRC, credit agencies and Companies House), and to establish, exercise or defend our legal rights.

Except as described above, please be assured that any third parties we share your data with will not use it for marketing purposes.

Transfer of personal data outside the European Economic Area

The information you provide to us will be transferred to and stored on our secure servers in the European Economic Area ("EEA"). However, from time to time, your personal data may be transferred to, stored in, or accessed from a destination outside the EEA. It may also be processed by staff operating outside of the EEA who work for a company in the Close Brothers Group or for one of our service providers or suppliers.

Where we transfer your personal data outside the EEA, we will ensure that it is protected in a manner that is consistent

with how your personal data will be protected by us in the EEA. This can be done in a number of ways, for instance:

- The country that we send the data to might be approved by the European Commission or a relevant data protection authority;
- The recipient might have signed up to a contract based on "model contractual clauses" approved by the European Commission, obliging them to protect your personal data; or

In other circumstances the law may permit us to otherwise transfer your personal data outside the EEA. In all cases, however, we will ensure that any transfer of your personal data is compliant with data protection law.

You can obtain more details of the protection given to your personal data when it is transferred outside the EEA (including a copy of the standard data protection clauses which we have entered into with recipients of your personal data) by contacting us in accordance with the "Contact us" section below.

How long we keep your personal data

How long we hold your personal data for will vary. The retention period will be determined by various criteria including:

- The purpose for which we are using it – we will need to keep the data for as long as is necessary for that purpose; and
- Legal obligations – laws or regulation may set a minimum period for which we have to store your personal data, for example, data relating to pension transfers is required to be kept for a longer period than other data.
- Legitimate business reasons:
 - » Due to the long term nature of the products and services we provide, to be able to answer any queries you may make, and to protect ourselves and you in the event of dispute, we your data may be kept for longer than our regulatory minimum requirements.
 - » Communications and marketing – if you do not become a client of ours but you express interest in our services including any future events or seminars, we will hold your data to keep you abreast of new initiatives you might find interesting. We would keep your data on file for 2 calendar years or until you ask us to remove your details/opt out of communications from us.

Your rights

You have a number of rights in relation to the personal data that we hold about you. These rights include:

- The right to obtain information regarding the processing of your personal data and access to the personal data which we hold about you.
- The right to withdraw your consent to our processing of your personal data at any time. Please note, however, that we may still be entitled to process your personal data if we have another legitimate reason (other than consent) for doing so;
- In some circumstances, the right to receive some personal data in a structured, commonly used and machine-readable format and/or request that we transmit

those data to a third party where this is technically feasible. Please note that this right only applies to personal data which you have provided to us;

- The right to request that we rectify your personal data if it is inaccurate or incomplete;
- The right to request that we erase your personal data in certain circumstances. Please note that there may be circumstances where you ask us to erase your personal data but we are legally entitled to retain it;
- The right to request that we restrict our processing of your personal data in certain circumstances. Please note that there may be circumstances where you ask us to restrict our processing of your personal data but we are legally entitled to refuse that request;
- The right to object to our processing of your personal data where we process your personal data pursuant to our legitimate business interests. Please note that there may be circumstances where you object to our processing of your personal data but we are legally entitled to refuse that request;
- The right to object to any automated decision making (including profiling) which we conduct based on your personal data, which significantly affects you. Please note that there may be circumstances where you object to us conducting automated decision making but we are legally entitled to refuse that request;
- The right to object to the processing of your personal data for direct marketing purposes; and
- The right to lodge a complaint with the data protection regulator (details of which are provided below) if you think that any of your rights have been infringed by us.

You can exercise your rights by contacting us using the details set out in the “Contacting us” section below.

You can find out more information about your rights by contacting the data protection regulator, the Information Commissioner, or by searching their website at <https://ico.org.uk/>.

Intermediaries, employees of intermediary companies and self-employed contractors/course tutors

This section does not apply to clients of Close Brothers Asset Management.

If you are an employee of one of our intermediary partners, or a self-employed tutor or contractor with whom we work, we will process your data and you will have the same rights as detailed above.

This document is up to date as at 10 August 2021.

Additional points you should note:

Information you give us

- If you are an employee of an intermediary you may provide us with contact details and/or details of your role/job title.
- If you are one of our self-employed contractors/tutors you will provide us with such due diligence information regarding yourself as is required to satisfy your contract of employment with us, or any third party to which you work on our behalf. Depending on the type of information we collect about you, you may also be subject to our employee privacy policy, a copy of which will be provided to you separately.

Sharing your personal data

If you are one of our self-employed contractors/tutors, we will share your information with third party companies at which you will provide educational services to fulfil their due diligence requirements.

Changes to our privacy policy

We keep our privacy policy under regular review. Any changes we make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy policy.

Contact us

We are registered in the UK and our registered address is at 10 Crown Place, London EC2A 4FT and our company registration number is 01644127.

Please contact us if you have any questions about our privacy policy or personal data we hold about you:

Write to:

The Data Protection Manager

Close Brothers Asset Management
Nelson House
Gadbrook Business Centre
Gadbrook Road
Northwich CW9 7TN

By email: CBAMdpm@closebrothers.com

We expect that any query you have regarding how your data is processed can be fulfilled by our Data Protection Manager.

If you are unsatisfied with their response, the contact details of the Close Brothers Group Data Protection Officer is:

DPO

Close Brothers Group
10 Crown Place
London EC2A 4FT.

By email: dpo@closebrothers.com