

# Consent to using your personal data

## What is my personal data?

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

## What is sensitive personal data?

Sensitive or 'Special Category' 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. The Special Category data we gather from you will generally be limited to health data as this may be relevant for our assessment of suitability regarding your investment strategy.

## How will you use my data?

In line with our Terms and Conditions, we will use your personal data to verify your identity and address, decide whether to enter into a client agreement with you, to manage, administer and take decisions regarding your account, manage our legitimate business interests, and to meet our legal and regulatory obligations. For more information, please see our Terms and Conditions or go to [www.closebrothersam.com/legal](http://www.closebrothersam.com/legal).

## How will you use my personal Special Category data?

Along with your other personal data, we will use this information to ensure that the investment service provided to you is suitable. Any health data you provide to us will, first and foremost, be used in our investment decisions. You may also notify us during the course of our relationship with you about changes to your health, for example if a Power of Attorney is put in place, which we need to take into account in order to continue to provide the best possible service to you.

## How, and for how long, will you store my data?

Your data will be stored securely electronically and/or in paper files.

Our regulatory obligations inform us that we must store the data you give us as a record of the information we have based our decisions on for a minimum of 5 years after your relationship with us ends.

Due to the long term nature of the service we provide, to be able to answer any queries you may make, and to protect ourselves and you in the event of dispute, we have decided to keep your data on record for at least 20 years after your relationship with us ends.

## Why might you share my information and who will you share it with?

Close Brothers Asset Management uses a number of 3rd party suppliers to provide systems, software and expertise in the execution and delivery of its services to you and may share your personal data, including Special Categories of data with any of these. For further information regarding these processors, please refer to our Privacy Notice on our website at [www.closebrothersam.com/legal](http://www.closebrothersam.com/legal).

Please be assured that these processors will not use your data for marketing purposes.

## Do you need my consent to process my data?

For the majority of the personal data we collect from you, your consent is not required as we must process it in order to provide our service to you.

However, we must obtain your consent to process your sensitive data which is a Special Category in order to provide our service to you.

## Can I withhold my consent for processing sensitive data?

Yes, but if you do, we may be unable to provide our service to you.

## Can I withdraw my consent for you processing my sensitive data and how would I do that?

Yes, you can withdraw your consent for us to process your Special Category data at any time by getting in touch with your Financial Adviser or your usual Close Brothers Asset Management (CBAM) contact.

However if you do withdraw your consent for us to process your Special Category data we may not be able to continue to provide you with our service.

The term 'Processing' includes the collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction of your data.

You should note that, if we have already provided you with our service, any Special Category data we hold will still be stored in line with our regulatory obligations but we will not 'use' it to provide you with further services.

## What about Marketing?

CBAM respects your relationship with your adviser and will not use your data for marketing purposes, either by ourselves, the wider Close Brothers Group or third parties.