

Redmayne Bentley LLP regards your privacy as very important.

Any personal information that we process about you will be dealt with in accordance with this Privacy Policy. If we provide services or products to you we shall provide you with any applicable terms and conditions that are to apply.

1. DATA PROTECTION

1.1 For the purposes of the Data Protection Act 2018 and the General Data Protection Regulation (Regulation (EU) 2016/679) (together, the data protection legislation) Redmayne Bentley LLP is the data controller of your personal information. We are registered with the Information Commissioner's Office (the ICO) under registration number Z6374485.

1.2 In accordance with data protection legislation we are required to collect and process your personal information lawfully, fairly and in a transparent manner. This includes providing you with the information set out in this Privacy Policy.

1.3 Our appointed Data Protection lead contact is the Director of Regulation and he can be contacted at leedscompliance@redmayne.co.uk

2. WHAT PERSONAL INFORMATION DO WE COLLECT AND HOW DO WE COLLECT IT?

2.1 Personal information (or personal data) means any information that can personally identify you, whether directly or indirectly.

2.2 We collect a variety of personal information about you, including:

- Personal demographics such as your title, name, date of birth, residential and employment details
- Financial information, such as bank account details and income and expenditure
- Contact details and records of all correspondence with you, including any call recordings
- Details of your visits to our Website (including traffic data) and the resources that you access (please see our Cookie Policy at www.redmayne.co.uk/cookie for further detail)
- Any other information that you provide to us.

Please note that we require certain personal information to be able to provide you with our services or products. If you do not provide such information, this may limit our ability to do so.

We may ask you to provide information that contains special categories of personal data about you (for example, your health information). In such cases we will obtain your express consent to process the information.

If you volunteer information to us that contains special categories of personal data you will be regarded as giving your explicit consent to us processing it. We will always seek

to confirm with you that this is the case.

We may process personal information relating to criminal convictions or offences as a result of our fraud prevention searches.

2.3 We will collect personal information:

Directly from you, for example:

- through information provided in completion of our forms, whether submitted on our Website, electronically or in person
- in correspondence with you, whether in person, by telephone or online

Indirectly, for example from:

- our agents and intermediaries, or other introducers such as financial advisors
- credit reference agencies (CRAs) or fraud prevention agencies (FPAs) from their records relating to you and other people with whom you are linked financially
- any person that provides your information to us (for example, a member of your household in seeking to obtain a product or service from us)
- publicly available sources, such as Companies House and social media sites.

3. WHY DO WE COLLECT YOUR PERSONAL INFORMATION AND ON WHAT LAWFUL GROUNDS?

3.1 We process your personal information for a number of reasons connected with the provision of investment management and stockbroking services. These include:

- understanding your circumstances and verifying your identity before we offer you a service or product
- administering and managing any account you have with us
- communicating with you, including to send marketing to you by post and email in respect of services and products which we feel will be of interest to you (unless you have opted out of receiving such marketing communications)
- maintaining and improving the Website
- reporting to our regulator, the Financial Conduct Authority (FCA), or any other regulatory or enforcement body or government agency.

3.2 The lawful basis that we rely upon in order to process your personal information is that the processing is necessary:

- for the performance of any contract we enter into with you or to take steps at your request prior to entering into a contract with you

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- in order to comply with our legal obligations
- to fulfil our legitimate interests of:
 - ensuring that we provide you with responsible advice and appropriate services and products
 - seeking to prevent fraud and money laundering
 - providing you with an excellent standard of service, which includes providing you with information about services or products, investment news & opportunities, invitations to seminars & events and publications & newsletters that we feel will be of interest to you.

3.3 Where we send marketing communications by email, we will obtain your consent. Where you have provided consent please note that you may withdraw it at any time. This shall not affect the lawfulness of any processing that was based on your consent before you withdrew it.

3.4 If you do not wish to receive marketing communications from us, you may opt out at any time. You can send an email to info@redmayne.co.uk or write to us at the address below. If you have a Client Web Access (CWA) account with us you can manage your e-marketing preferences by logging into your online account at www.redmayne.net. If you opt out of our use of your personal information for marketing purposes, we will honour such choice once we have had reasonable opportunity to process your request.

4. WHO WILL WE SHARE YOUR PERSONAL INFORMATION WITH?

4.1 In providing our services to you as described above, we may disclose your personal information to the following third parties:

- regulatory bodies and enforcement agencies
- government agencies, such as HMRC, and the London Stock Exchange
- CRAs and FPAs
- third parties who we engage to provide services to us.

4.2 Redmayne Bentley may utilise TransUnion (formerly 'CallCredit') to verify the identity of individuals. For information on how TransUnion process your data, please refer to their privacy notice at www.callcredit.co.uk/legal-information/bureau-privacy-notice

4.3 We will ensure that appropriate data processing agreements are in place where appropriate.

5. STORAGE AND TRANSFER OF YOUR PERSONAL DATA

5.1 All information you provide to us is stored on secure servers within the UK. We do not systematically transfer your personal data outside the European Economic Area (EEA).

5.2 If you hold shares overseas we may transfer personal information relating to your shareholding to the location in which they are held. We do so on the basis that the transfer is necessary for the performance of the contract that we have with you or the implementation of pre-contractual measures taken at your request, or that it is necessary for the conclusion or performance of a contract concluded in your interest.

5.3 Should we transfer your personal information outside the EEA in any other ways we will ensure that there is adequate protection in place in respect of that transfer.

6. RETENTION OF YOUR PERSONAL DATA

We will retain your personal information for as long as we need to in order to fulfil the relevant purpose(s) it was collected for, as set out above in this Privacy Policy, unless we are required to keep it for a longer period by regulation or we have legitimate reasons for doing so.

If you do not have an account with us but you have agreed to receive marketing from us we will hold your contact details for marketing purposes unless you request otherwise.

7. WHAT ARE YOUR DATA PROTECTION RIGHTS?

7.1 You have specific rights in respect of the personal information that we process about you. If you seek to exercise your rights we will explain whether or not the right applies to you. Please be aware that if your request is manifestly unfounded or excessive we may refuse to deal with your request or charge a reasonable fee for dealing with it.

7.2 Your rights include:

- The **right of access** to the personal data we hold about you.
- The **right to rectify (i.e. correct) your personal data** where it is inaccurate or incomplete.
- The **right to delete your personal data**, but only in specific circumstances, for example where the personal data are no longer necessary in relation to the purpose for which it was originally collected or processed. It may not therefore always be possible for us to delete the information we hold about you if you request this, for example, if we have an ongoing contractual relationship with you.
- The **right to restrict processing** in specific circumstances, for example while we are reviewing the accuracy or completeness of data, or deciding on whether any request for erasure is valid. In such cases we shall continue to store the data, but not further process it until such time as we have resolved the request.
- The **right to data portability** which means the right to receive, move, copy or transfer your personal data to another controller. You have the right to this when we are processing your personal information based on consent or on a contract and the processing is carried out by automated means.
- The **right to object to processing** in cases where processing is based upon our legitimate interests or where processing is for direct marketing purposes (including profiling).

7.3 Please write to leedscompliance@redmayne.co.uk if you would like to exercise any of your data protection rights or if you have any queries in respect of your rights.

8. COOKIES

We use cookies on our Website. Please refer to our Cookie Policy at www.redmayne.co.uk/cookie for further information.

9. CHANGES TO THIS PRIVACY POLICY

We may edit or amend this Privacy Policy from time to time in which case we shall publish the amended version on our Website. We will inform you should we process your personal information for a purpose other than the purpose for which it was obtained.

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10. LINKS TO OTHER WEBSITES

This Privacy Policy does not extend to your use of, provision of data to or collection of data on any website to which you may link by using the hypertext links within our Website.

11. CONTACTING US

If you have any questions about our Privacy Policy or any other aspect of our Website please contact us at:

Redmayne Bentley LLP, 9 Bond Court, Leeds LS1 2JZ

Telephone: **0113 243 6941**

Email: info@redmayne.co.uk

Office Opening Times: 8am - 5pm, Monday to Friday.

Please note that you can complain to our supervisory authority, the ICO, by telephoning 0303 123 113 or writing to Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF. For further information, the ICO's website can be accessed at www.ico.org.uk.

Last updated: September 2018