

Global Investment Strategy UK Limited

Privacy Policy

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1. Introduction

Welcome to the Global Investment Strategy UK Limited ("GIS") privacy notice.

GIS respects your privacy and is committed to protecting your personal data. This privacy notice will inform you as to how we look after your personal data and tell you about your privacy rights and how the law protects you.

This privacy notice is provided in a PDF format so you can download a PDF version of the policy from our website <https://www.gisukltd.com/legal-and-regulatory>.

Please use the Glossary under paragraph 10 to understand the meaning of some of the terms used in this privacy notice.

2. Important information and who we are

2.1 Purpose of this privacy notice

This privacy notice aims to give you information on how GIS collects and processes your personal data in connection with our business. "Personal information" means information about a living individual who can be identified from that information (either by itself or when it is combined with other information).

We may update our Privacy Notice on our website. We would encourage you to visit our website regularly to stay informed of the purposes for which we process your information and your rights to control how we process it.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you, so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

2.2 Controller

GIS is the controller and is responsible for your personal data (collectively referred to as "we", "us" or "our" in this privacy notice).

GIS is made up of different legal entities, details of which can be found here <https://www.gisukltd.com/>

This privacy notice is issued on behalf of GIS so when we mention "GIS", "we", "us" or "our" in this privacy notice, we are referring to the relevant company in the "GIS" Group responsible for processing your data. GIS is the controller and responsible for this website.

We have appointed a data protection officer (DPO) who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your right to access, please contact the DPO using the details set out below.

2.3 Contact Details

Contact: John Gunn
Address: 200 Aldersgate, London, EC1A 4HD

Telephone: 0207 048 9400

You have the right to make a complaint about how we handled your personal information at any time to our Data Protection Officer at: john.gunn@gisukltd.com or by contacting the Information Commissioner's Office (ICO), or the UK supervisory authority for data protection issues at: www.ico.org.uk. We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

to inform us of changes

2.4 Changes to the privacy notice and your duty

This version was last updated on 22 May 2018 and historic versions can be obtained by contacting us. It is important that the personal data we hold about you is accurate and current.

Please keep us informed if your personal data changes during your relationship with us.

2.5 Third-party links

We will not share your information with anyone outside of GIS except:

- a) Where we have your (or your agent's) express or implied permission;
- b) Where required for your product or services;
- c) Where we are required to by law or by law enforcement agencies, judicial bodies, government entities, tax authorities or regulatory bodies around the world;
- d) With third parties providing services to us, such as market analysis and benchmarking, and agents and subcontractors acting on our behalf, such as our payroll or IT providers.
- e) With other firms to help trace funds where you are a victim of suspected financial crime and you have agreed for us to do so, or where we suspect funds have entered your account as a result of a financial crime;
- f) With credit reference and fraud prevention agencies;
- g) With third party guarantors or other companies that provide you with benefits or services (such as insurance cover)
- h) Where required for a proposed sale, reorganisation, transfer, financial arrangement, asset disposal or other transaction relating to our business and/or asset held by our business;
- i) In anonymised form as part of statistics or other aggregated data shared with third parties; or
- j) To meet our duties to regulators, we may allow authorised people to see our records (which may include information about you) for reporting, compliance and auditing purposes. For the same reason we will also hold the information about you when you are no longer a customer.

Our website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

3. The data we collect about you

Depending on the services you have ordered, or you are interested in, we collect and process different kinds of personal data. We will limit the collection and processing of information to information necessary to achieve one or more legitimate purposes as identified in this notice.

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Contact Data** includes billing address, delivery address, email address and telephone numbers.
- **Financial Data** includes financial information, including account and transactional information and history. We may also ask for information about your financial circumstances, including personal wealth, assets and liabilities, proof of income, liabilities and taxes.
- **Identity Data** includes basic personal information, including name, date of birth, KYC documents (including a copy of your national identity card or passport).
- **Identifiers** we assign to you, such as your client or account number, including for accounting purposes.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.
- **Profile Data** includes your username and password, purchases or orders made by you and preferences.
- **Professional** information about you, such as your job title and work experience.

- **Tax Data** including domicile and other tax-related documents and information.
- **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access our website.
- **Usage Data** includes information about how you use our website, products and services.
- **Your knowledge** or and experience in investment matters.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

We do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data).

Where permitted by law, we may process information about criminal convictions or offences and alleged offences for specific and limited activities and purposes, such as to perform checks to prevent and detect crime and to comply with laws relating to money laundering, fraud, terrorist financing, bribery and corruption, and international sanctions. It may involve investigating and gathering intelligence on suspected financial crimes,

fraud and threats and sharing data with law enforcement and regulatory bodies.

3.1 If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

4. How is your personal data collected?

We use different methods to collect data from and about you including through:

Direct interactions. You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:

- apply for our products or services;
- create an account on our website;
- subscribe to our service or publications;
- request marketing communication to be sent to you;
- enter a competition, promotion or survey; or
- give us some feedback.

Automated technologies or interactions.

As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies.

Information from other organisations. Such as credit reference and fraud prevention agencies.

Information from people who know you.

Such as your advisors, joint account holders and people who are financially linked to you including information we get from analysing our transactions.

Third parties or publicly available sources.

We may receive personal data about you from various third parties and public sources as set out below:

- Technical data from the following parties;
 - o Analytics providers such as Google Analytics
 - o Advertising networks such as Facebook; and
 - o Search information providers such as Google
- Contact, Financial and Transaction Data from providers of technical, payment and delivery services such as Worldpay.
- Identity and Contact Data from data brokers or aggregators such as Smartsearch.
- Identity and Contact Data from publicly available sources such as Companies House and the Electoral Register.

Once you have given us your consent you can withdraw it at any time, unless there is another legal reason under Data Protection Laws that allows us to process your information. Please note that if you withdraw your consent, we might not be able to provide you with specific services or products.

You can withdraw your consent at any time by getting in touch with us.

5. How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.
- Where we need to contact you in relation to the contract we are about to enter into or have entered into with you.

5.1 Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we

rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below:

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new customer	(a) Identity (b) Contact (c) Financial (d) Profile	Performance of a contract with you Necessary to comply with a legal obligation Necessary for our legitimate interests
To process & deliver your application including: • Manage payments, fees and charges • Collect and recover money owed to us	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing & Communications	Performance of a contract with you Necessary for our legitimate interests (to recover debts due to us)
To manage our relationship with you which will include: • Notifying you about changes to our terms or privacy policy • Asking you to leave a review or take a survey	(a) Identity (b) Contact (c) Profile (d) Marketing & Communications	Performance of a contract with you Necessary to comply with a legal obligation Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)
To administer & protect our business & our website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) Necessary to comply with a legal obligation
To deliver relevant website content & advertisements to you & measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing & Communications (f) Technical	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website, products/services, marketing, customer relationships & experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business & to inform our marketing strategy)
To make suggestions & recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile (f) Marketing and Communications	Necessary for our legitimate interests (to develop our products/services & grow our business)

5.2 Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. You can manage your marketing preferences by logging into your client portal using this link <https://secure.gisukltd.com/login/>, or by contacting us.

5.3 Promotional offers from us

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have signed up for our newsletter, you have requested information from us or became our client and, in each case, you have not opted out of receiving that marketing.

5.4 Third-party marketing

We will get your express opt-in consent before we share your personal data with any company outside the GIS group of companies for marketing purposes.

5.5 Opting out

You can ask us or third parties to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you, or by logging into your client portal and adjusting your marketing preferences, or by contacting us directly.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product/service purchase, product/service experience or other transactions.

5.6 Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly.

5.7 Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us. If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

6. Disclosures of your personal data

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 5 above.

- Internal Third Parties as set out in the *Glossary*.
- External Third Parties as set out in the *Glossary*.
- Specific Third Parties listed in the table in *paragraph 5* above

Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

6.1 International transfers

We may share your personal data within the GIS Group. This will involve transferring your data outside the European Economic Area (EEA).

We ensure your personal data is protected by requiring all our group companies to follow the same rules when processing your personal data. These rules are called "binding corporate

rules". For further details, see European Commission: Binding corporate rules.

Some of our external third parties are based outside the European Economic Area (EEA) so their processing of your personal data will involve a transfer of data outside the EEA.

Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission;
- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe.
- Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

7. Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

8. Data retention

8.1 How long will you use my personal data for?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

9. Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. These rights are defined in Appendix 1)

If you wish to exercise any of the rights set out in Appendix 1, please contact us.

9.1 No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

9.2 What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

9.3 Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is

particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

10. Glossary

9.4 Lawful Basis

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Comply with a legal or regulatory obligation means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

9.5 Third Parties

9.5.1 Internal Third Parties

Other companies in the GIS Group acting as joint controllers or processors and who provide IT and system administration services and undertake leadership reporting.

9.5.2 External Third Parties

- Service providers acting as processors based within the United Kingdom who provide IT and system administration services.
- Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers based within the United Kingdom who provide

consultancy, banking, legal, insurance and accounting services.

- HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in the United Kingdom who require reporting of processing activities in certain circumstances.

APPENDIX 1

YOUR LEGAL RIGHTS

You have the right to:

Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d)

you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.