

# Saunderson House Privacy Policy

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HOUSE

## Summary

Saunderson House Limited (“SHL”) considers protecting your personal information is of utmost importance. We will collect and use personal information about you to enable us to supply financial advisory and investment services to you and to help us to manage our relationship with you.

This may involve sharing your personal information with

a) certain members of your family such as your spouse, partner or other adult members of your family or dependants if you are one of our private clients; or

b) representatives, trustees, settlors or beneficiaries if you are one of our charity or trust clients;

and in each case, where it has been agreed that our services will include these third parties.

We may also share your personal information with organisations that are not part of SHL. This privacy policy sets out how we will use your personal information, what your rights are in relation to that personal information and how you can exercise those rights.

If you are a spouse, partner or other family member of one of our private clients or if you are a representative, trustee, settlor or beneficiary of one of our charity or trust clients and you share your personal information with us, the terms of this privacy policy will also apply to you.

## Introduction

In this privacy policy:

“**personal information**” means any information about you, that may be used to identify you, including but not limited to, your name, address, contact details (including an email address and mobile phone number), details of investments both recommended by SHL or managed by our discretionary service, or those investments which we did not recommend but which we retain information on and include in financial analysis we undertake for you and data collected as part of any documents you complete or online services to which you subscribe;

“**we, us or our**” means Saunderson House Limited, a company registered in England and Wales (CN 00940473), whose registered office is at 1 Long Lane, London, EC1A 9HF;

“**website**” means [www.saundersonhouse.co.uk](http://www.saundersonhouse.co.uk); and

“**you**” or “**your**” means the person whose personal information we collect, use and process.

By using the SHL website you agree to the use of your information as set out in this Privacy Policy.

We are registered as a data controller at the UK Information Commissioner’s Office. Our data protection registration number is Z5240720. We control the personal information that is collected by us about you and the purposes for which we use that information. This means that we are the data controller for the purposes of the Data Protection Act 1998 (the “DPA”) in respect of such personal information.

## What information do we collect?

We may collect, store and use personal information about you. In particular we may collect, store and use:

1. information about your computer and about your visits to and use of our Website (using google analytics);
2. information about you or your family members (if you are a private client) or your representatives, trustees, settlors or beneficiaries (if you are one of our charity or trust clients) that you provide when completing application forms for investments and information that is publically available;
3. information gathered from sites where you have added your own information for the purposes of communication and potential marketing opportunities with third parties (such as LinkedIn)
4. information contained in and records of communications between us, including e-mails, letters and text messages.  
We do not record telephone calls;

5. we will collect information concerning your marketing preferences;
6. information retained by us in accordance with our regulatory obligations including, Know Your Client requirements, Suitability and Anti-Money Laundering verification.

We may also from time to time collect sensitive personal information about you where this is necessary to enable us to arrange for financial products to be obtained on your behalf and share it with the provider of those financial products (such as health declarations in certain application forms). We will retain a copy of these forms for our records.

### **How we use your Personal Information**

We use your personal information in connection with the provision of financial services to you. In particular, we may use your personal information to:

1. carry out our obligations arising from any contracts entered into between you and us including in connection with the financial services;
2. discuss the provision of financial services to you with you and other members of your family such as your spouse or partner (or with other adult members of your family including dependants) where you are a private client and it has been agreed that our services will include these family members;;
3. discuss the provision of financial services to you with you and your representatives, trustees, settlors or beneficiaries where you are one of our charity or trust clients and it has been agreed that our services will include these third parties;
4. support and assist third parties in relation to any financial products they supply to you;
5. manage and administer the relationship between you and us
6. comply with our legal obligations and with instructions from regulatory bodies such as the Financial Conduct Authority (the "FCA");
7. to notify you about changes to our financial services and otherwise communicate with you, for example, we will use your contact details to respond to queries that you submit to us;
8. to train our staff to improve our financial services; and
9. to analyse the efficacy of our financial services and marketing activity.

You are not required to provide your details or complete any registration process before you can use our Website. You can access the Website without providing any personal details.

We may use your personal information to provide you with information about our financial services (including details of seminars and events, investment updates and other information about regulatory and market developments) which we think you may find interesting. The section below entitled "Changing your preferences" explains how you can change whether to receive this information.

### **Who we will share your personal information with**

If you choose to provide us with your personal information, we may share that personal information within SHL and with our parent company IFG Group Plc, in accordance with the DPA.

We will not sell, distribute or lease your personal information to third parties for marketing purposes.

We may disclose your personal information to third parties in connection with our financial services. For example, we may pass your personal information to:

- third party organisations that provide services to us (including, for example third party platform providers for processing business or obtaining external compliance or regulatory advice and online anti-money laundering checks);
- external agencies and organisations (including the FCA, Financial Ombudsman Service, National Crime Agency, the police and other law enforcement agencies) for the purpose of preventing and detecting fraud (including fraudulent transactions), money laundering and criminal activity. We may disclose personal information to the police and other law enforcement agencies in connection with the prevention and detection of crime; and
- third parties if we are under a duty to disclose or share your personal information in order to comply with any legal obligation or instructions of a regulatory body such as the FCA (including in connection with a court order), or in order to enforce or apply the terms of any agreements we have with or otherwise concerning you (including agreements between you and us) or to protect our rights, property or safety of our clients, employees or other third parties.

## Your rights and how to exercise them

### *How can I see what information you hold on me?*

You may request details of personal information which we hold about you under the DPA. This right is subject to certain exemptions. A small fee will be payable by you and, we may occasionally request proof of identity before we are able to disclose personal information to you. If you would like to request a copy of the information we currently hold on you please write to us using the contact details below.

### *Keeping up to date*

If you believe that any personal information we hold about you is incorrect or incomplete, please contact us using the details below.

### *Changing your preferences*

If you have previously agreed to us using your personal information for direct marketing purposes and would like to change your preferences or would like to stop receiving marketing communications, you can do so by writing to us at the contact details below.

You can also opt out of receiving marketing e-mails by clicking on the [unsubscribe link] in our e-mail marketing communications.

## Links to other websites

Our website may contain links to other websites of interest. However, once you have used these links to leave our website, please be aware that we do not have any control over that website. This means that we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such websites, or which cookies are used. Such sites are not governed by this privacy statement. You should exercise caution and look at the privacy statement applicable to the website in question.

## Security

You acknowledge that the transmission of information via the internet and email is inherently insecure, and that we cannot guarantee the security of data sent over the internet where the security is outside our control.

## How does SHL use cookies?

A cookie is a small text file which asks permission to be placed on your computer's hard drive and collects anonymous information about visits to our website. Once you agree, the file is added and the cookie helps analyse web traffic or lets us know when you visit a particular site. Please visit our Cookie consent policy <http://www.saundersonhouse.co.uk/cookie-consent/> for further information.

## How to contact us

If you have any questions, comments or requests regarding this privacy policy, please feel free to contact us using the details set out below.

By post:

Senior Manager, Risk and Compliance

Saunderson House Limited

1 Long Lane

London

EC1A 9HF

By email marked for the attention of the Senior Manager, Risk and Compliance:

[shl@saundersonhouse.co.uk](mailto:shl@saundersonhouse.co.uk)

## Policy changes

If we decide to change this privacy policy, we'll post the updated privacy policy on our website so that you're always aware of what personal information we collect, how we use it and under what circumstances we disclose it. The updated privacy policy will take effect as soon as it's posted on our website.

This privacy policy was last updated in June 2016.

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