

## **Privacy Policy**

### ***Who are we?***

We are Redington Limited, an independent investment consultant based in the UK, offering asset allocation, manager selection and risk management services to investors.

### ***How we use and protect your data***

At Redington we are committed to protecting and preserving the privacy of our visitors when visiting our website or communicating electronically with us.

This Policy explains when and why we collect personal data or personal information about people who visit our website, how we use it, the conditions under which we may disclose it to others and how we keep it secure.

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).

Whilst we will keep all of your personal information confidential, we reserve the right to disclose this information in the circumstances as set out within this Policy. We confirm that we will keep the information on a secure server and that we will comply fully with all applicable UK Data Protection legislation and regulations in force from time to time.

### ***How do we collect information from you?***

We obtain information about you when you use our website, for example, when you contact us about our services, if you directly give us any information via forms or otherwise, or if you sign up to receive information such as email newsletters.

### ***What type of information is collected from you?***

In running and operating the business, we may collect and process certain data and information relating to you and your use of our website. Your privacy is important to us and we confirm that we will never release your personal details to any third party for their mailing or marketing purposes. The data that we collect is detailed below:

- Information you provide via the website, Hubspot Inc or if you report a problem with the website.
- Details of visits to our website and the pages and resources that are accessed, including but not limited to, traffic data, location data and other communication data that may assist us in understanding how visitors use the website. This may also include the resources that you access, and information about where you are on the internet including the domain type, IP address and URL that you came from. This information is collected and used for our internal research purposes and to improve our customer service.
- The personal information we collect might include your name, address, email address, IP address, and information regarding what pages are accessed and when. This information is recorded and may be sent to third-party processors for the purposes of data analysis, to improve our marketing efforts, to assist us in providing our services and for targeting specific services.
- Information you provide to us by sending us a message through our website and information provided to us when you communicate with us electronically for any reason, including subscription services. If you contact us, we may keep a record of your email and other correspondence.
- Information that you provide us as a result of filling in forms on our website.

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). Nor do we collect any information about criminal convictions and offences.

### ***Internet Protocol Addresses***

We may collect information about your computer, including but not limited to (where available), your Internet Protocol address, operating system and browser type for administration purposes and to produce internal reports. This is statistical data relating to a web user's browsing actions and patterns and does not specifically identify you as an individual.

### ***How is your information used?***

We may use your information:

- to ensure that the content on the site is presented in the most efficient way for you and the computer that you are using;
- to enable you to participate in interactive features of the site;
- to provide you with information relating to our website, product or our services that you request from us;
- to provide you with information on other services that we feel may be of interest to you in line with those you have previously expressed an interest in via our website;
- to meet our obligations arising from any contracts entered into by you and us;
- for dealing with entries into a competition;
- to seek your views or comments on the services we provide;
- to notify you about any changes to our website, including improvements, and service or product changes;
- to send you communications which you have requested and that may be of interest to you;
- for our internal purposes including statistical or survey purposes, quality control, site performance and evaluation in order to improve our website; and
- to administer this website.

We review our retention periods for personal information on a regular basis. We will hold your personal information on our systems for as long as is necessary for the relevant activity, or as long as is set out in any relevant contract you hold with us.

### ***Who has access to your information?***

We will not sell or rent your information to third parties. We will not share your information with third parties for marketing purposes.

### ***Third Party Processing***

We utilise the services of third party organisations to process your personal data.

*Third Party Providers:* We may pass your information to our third-party service providers, agents subcontractors and other associated organisations for the purposes of completing tasks and providing services to you on our behalf (for example to send you subscription emails). However, when we use third party service providers, we disclose only the personal information that is necessary to deliver the service and we have a contract in place that requires them to keep your information secure and not to use it for their own direct marketing purposes. Please be reassured that we will not release your information to third parties beyond Redington Limited for them to use for their own direct marketing purposes, unless you have requested us to do so. We may release your information if we are required to do so by law, for example, by a court order or for the purposes of prevention of fraud or other crime.

When you request our subscription services, your information is also held with our third-party provider, HubSpot, Inc. HubSpot's products are currently hosted in U.S.-based data centers. When you make your subscription preferences, HubSpot Inc. will use your details to provide you with the information requested. Today, HubSpot maintains a Privacy Shield certification with the U.S. Department of Commerce as one way to ensure that adequate safeguards are in place when transferring personal data from the EU to the US. You can get more information about HubSpot's approach to data privacy at <https://legal.hubspot.com/privacy-policy>.

We may transfer your personal information to a third party as part of a sale of some or all of our business and assets to any third party or as part of any business restructuring or reorganisation, or if we're under a duty to disclose or share your personal data in order to comply with any legal obligation or to enforce or apply our terms of use or to protect the rights, property or safety of our supporters and customers. However, we will take steps with the aim of ensuring that your privacy rights continue to be protected.

### ***How Do I opt out?***

You have a choice about whether or not you wish to receive information from us. We will not make contact with you unless you have opted in. If then, you no longer want to receive marketing communications from us, then you can change your preferences or completely unsubscribe in one of two ways:

- Click the 'unsubscribe' or 'change preferences' link at the bottom of marketing emails sent to you
- Email [dataprivacy@redington.co.uk](mailto:dataprivacy@redington.co.uk) or telephone 020 7250 3331 and we will process your request promptly

We will not contact you for marketing purposes by email, phone or text message unless you have given your prior written consent. We will not contact you for marketing purposes by post if you have indicated that you do not wish to be contacted.

### ***Your 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.

After 28th May 2018, 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.

#### **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.

#### **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.

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://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.

Please email us at: [dataprivacy@redington.co.uk](mailto:dataprivacy@redington.co.uk) or write to us at: Compliance Team, Redington Limited, Floor 6, One Angel Court, London, EC2R 7HJ. Alternatively, you can telephone 020 7250 3331.

#### ***Security precautions in place to protect the loss, misuse or alteration of your information***

When you give us personal information, we take steps to ensure that it's treated securely. When you are on a secure page, a lock icon will appear in the address bar of modern web browsers such as Microsoft Edge and Google Chrome.

Once we receive your information, we make our best effort to ensure its security on our systems. Where we have given (or where you have chosen) a password which enables you to access certain parts of our websites, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

#### ***Profiling***

We may analyse your personal information to create a profile of your interests and preferences so that we can contact you with information relevant to you. This automated processing is intended to evaluate certain personal aspects of an individual. We may also use your personal information to detect and reduce fraud and credit risk.

#### ***Use of 'cookies'***

Like many other websites, the Redington website uses cookies. 'Cookies' are small pieces of information sent by an organisation to your computer and stored on your hard drive to allow that website to recognise you when you visit. Cookies are sometimes used to improve the website experience of a visitor to a website. They collect statistical data about your browsing actions and patterns and do not identify you as an individual. For example, we use cookies to pre-fill some information on forms and to enable us to see what people view on the website and for how long. The use of cookies enables us to improve our website, deliver effective services and offer a more personalised service.

We may also use the cookies to gather information about your general internet use to further assist is in developing our website. Where used, these cookies are downloaded to your computer automatically. This cookie file is stored on the hard drive of your computer. Cookies contain information that is transferred to your computer's hard drive and then stored there and transferred to us where appropriate to help us to improve our website and the service that we provide to you.

It is possible to switch off cookies by adjusting your browser preferences or using a dedicated browser extension.

### ***Links to other websites***

Our website may contain links to other websites run by other organisations. This Policy applies only to our website, so we encourage you to read the privacy statements on the other websites you visit. We cannot be responsible for the privacy policies and practices of other websites even if you access them using links from our website.

In addition, if you were referred to our website from a third-party site, we cannot be responsible for the privacy policies and practices of the owners and operators of that third-party site and recommend that you check the policy of that third party site.

### ***Those aged 16 or Under***

It is imperative that we also protect the privacy of children aged 16 or under. If you are aged 16 or under, please get your parent/guardian's permission beforehand whenever you provide us with personal information.

### ***Transferring your information outside of Europe***

As part of the services offered to you through this website, the information which you provide to us may be transferred to countries outside the European Union ("EU"). By way of example, this may happen if any of our servers are from time to time located in a country outside of the EU. These countries may not have similar data protection laws to the UK. By submitting your personal data, you are agreeing to this transfer, storing or processing. If we transfer your information outside of the EU in this way, we will take steps to ensure that appropriate security measures are taken with the aim of ensuring that your privacy rights continue to be protected as outlined in this Policy.

If you use our services while you are outside the EU, your information may be transferred outside the EU in order to provide you with those services.

### ***Review of this Policy***

We keep this Policy under regular review. We may change this Policy from time to time so please check this page occasionally to ensure that you are happy with any changes. Any material changes to this Policy will be notified to you via a pop-up notice on our website. By using our website, you are agreeing to be bound by this Policy.

Any questions regarding this Policy and our privacy practices should be sent by email to [dataprivacy@redington.co.uk](mailto:dataprivacy@redington.co.uk) or by writing to the Compliance Team, Redington Limited, Floor 6, One Angel Court, London, EC2R 7HJ. Alternatively, you can telephone us on 020 7250 3331.

This Privacy Policy was last updated in May 2018.