

PIGOTTS INVESTMENTS LIMITED PRIVACY POLICY

Introduction

Pigotts Investments Limited respects your privacy and is committed to protecting your personal data.

Purpose of this Privacy Policy

This Privacy Policy sets out the basis on which any personal data Pigotts Investments Limited collects from you, or that you provide to Pigotts Investments Limited, will be processed.

Our website and services are not intended for children. In the course of providing our services to clients aged 18 or over, we may collect limited data relating to their children, for example details relating to 'Junior ISAs'.

Controller

Pigotts Investments Limited is the controller and responsible for your personal data. Pigotts Investments Limited is collectively referred to as 'Company', 'we', 'us' or 'our' in this Privacy Policy. The Company has its registered office at 3 Bentsbrook Park, North Holmwood, Dorking, Surrey RH5 4JL.

Contact Details

If you have any questions about this Privacy Policy, including any requests to exercise your legal rights, please contact us by email at advice@pigottsinvestments.co.uk or by post at the postal address above.

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). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

The data we collect about you

Personal data (also referred to as 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:

- **Identity Data** includes first name, last name, username or similar identifier, title and gender.
- **Contact Data** includes postal address, email address and telephone numbers.
- **Financial Data** includes bank account details.
- **Transaction Data** includes details about payments to and from you and other details of services you have purchased from us.
- **Technical Data** includes operating system and platform and other technology on the devices you use to access our website.
- **Communications Data** includes your preferences in receiving communications and updates from us and your communication preferences.
- **Data required to provide services to you** following an instruction by you to do so.
- **Health Data** includes general medical and health information.

We do not collect any of the following **Special Categories of Personal Data** about you: details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade

union membership, genetic and biometric data. Nor do we collect any information about criminal convictions and offences.

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 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.

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 meeting with us in person, corresponding with us by post, phone, email or otherwise, or by filling in forms (in hard copy or via our website). This includes personal data you provide when you:
 - request us to provide services;
 - subscribe to our publications, e-newsletters, newflashes or request any other communications to be sent to you; or
 - provide us feedback or contact us for any other reason.
- **Automated technologies or interactions.** If you use our website, and as you interact with it, we will automatically collect Technical Data by using cookies and other similar technologies. A cookie is a small file of letters and numbers that we put on your computer, if you agree. These cookies allow us to distinguish you from other users of our website which helps us to provide you with a good experience when you browse our website and also allows us to improve our site.
- **Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources such as:
 - identity and contact information obtained from Companies House. Information may also be passed to us as a result of a referral from a third party; or
 - financial and transactional information obtained from banks and financial institutions who may provide financial and transactional information including your bank account details, details about payments to and from you and other details of services we have provided to you.

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 or the organisation for which you work.
- Where it is necessary for our legitimate business 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.

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 client	(a) Identity (b) Contact	Performance of a contract with you
To deliver our services to you including: (a) Enabling financial decisions to be made on your behalf (b) Enabling communications with you about your financial affairs (c) Trading on the Stock Market on your behalf (d) Enabling the processing of trades on your behalf (e) Collecting and recovering money owed to us for these services	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or Privacy Policy (b) Asking you to leave a review or provide us with feedback	(a) Identity (b) Contact (c) Profile (d) Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how clients use our services)
To administer and protect our business and our website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security and to prevent fraud) (b) Necessary to comply with a legal obligation
To make suggestions and recommendations to you about services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile (f) Communications	Necessary for our legitimate interests (to develop our services and grow our business)

Who will have access to your personal data

- **Internal sharing.** Employees may be given access to your personal data for the purposes of providing our services, undertaking money laundering checks and billing. Their use is always limited to the performance of their duties as employees, and all employees are required to keep that information confidential and are not permitted to use it for any purposes other than those stated.
- **External third parties.** We may share your information with the third parties below:
 - service and software providers acting as processors who provide the following services:
 - service supplier for the purpose of providing IT and system administration services;
 - companies which provide services to enable us complete your instructions, including money-laundering check service providers, fraud prevention agencies and payment processors; and
 - government agencies such as Companies House, HMRC and Probate Registry;
 - professional advisers acting as processors or joint controllers including lawyers, bankers, brokers, auditors, insurers, banking, legal, insurance, accounting and other advisory services; and
 - HMRC, Companies House, regulators and other authorities acting as processors or joint controllers who require reporting of processing activities in certain circumstances.

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 and professional advisors 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.

Advisory communications

If you are an existing or recent client, your personal data may be used in our legitimate interests to send you communications containing updates, event details and information that is relevant to the nature of our relationship. This will be in line with the communication preferences that you indicated when you provided your personal data to us and/or in line with the provisions on consent in the current e-privacy rules. We will also send you communications where, for example, you have signed up to our e-newsletter via the website or requested communications from us in another way.

Opting out

You may, at any time, opt-out of receiving communications from us. Please contact us at advice@pigottsinvestments.co.uk or the postal address above. If you would like to change the way in which we communicate with you (such as email or post) please contact us at advice@pigottsinvestments.co.uk or the postal address above.

Third party marketing

We never share your personal data with any third party for marketing purposes.

Automated decision making and profiling

Your data will not be used by Pigotts Investments Limited in relation to automatic decision making and profiling.

Cookies

Our website uses cookies to collect information about how our visitors use our website, for instance which pages visitors go to most often. 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 our website may become inaccessible or not function properly.

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 at advice@pigottsinvestments.co.uk or the postal address above. 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. Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

Disclosures of your personal data

We may have to share your personal data with third parties for the purpose of completing any contract we have with you or your organisation, for example, pension transfers. We require all third parties with whom we share your personal data to respect the security of your 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.

International data transfers

We do not transfer your personal data outside the European Economic Area.

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.

Data retention

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. In most cases, we will retain your personal data for the period for which you remain an active client and for up to seven years after you cease to be an active client, or upon completion of the administration of your estate for tax purposes. We also have to keep any information relating pensions and pension advice for the duration of your lifetime. In some circumstances we will anonymise your personal

data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. These rights include your right to:

- Request access to your personal data
- Request correction of your personal data
- Request erasure of your personal data
- Object to processing of your personal data
- Request restriction of processing your personal data
- Request transfer of your personal data
- Right to withdraw consent to processing (note that we usually have other grounds for processing personal data but where we do process on the basis of consent, you have the right to withdraw the consent at any time)

If you wish to exercise any of the rights set out above, please contact us at advice@pigottsinvestments or the postal address above. 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 could refuse to comply with your request in these circumstances.

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.

Third-party links

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 policy of every website you visit.

Changes to the Privacy Policy and your duty to inform us of changes

We keep our Privacy Policy under regular review. This version was last updated in March 2019. 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.