



## Equiniti Financial Services Limited (EFSL) Privacy Notice

Equiniti Financial Services Limited handles a large amount of personal data in providing services to millions of UK customers. We are committed to keeping your data safe and using it in a clear and transparent way. This summary details why we hold your data, including any ways that you might not expect. Please read the following Privacy Notice pages if you want to know more.

### We hold your data

- To provide you with great products and services.
- To protect the assets we hold on your behalf.
- To contact you about other products and services we provide: you can update your permissions at any time.

We always seek to use your data in ways you would expect, but we also have to hold data to meet legal and regulatory requirements relating to the products you use.

You have rights over the data we hold about you. In particular, you can choose if you want to receive information about offers, rewards and new products. You can tell us how you would prefer to hear from us. You are able to opt out at any time.

### Things you might not know

- In order to offer you an efficient service some of our processing is undertaken overseas – this includes India and the USA. We always implement appropriate controls to ensure your data stays protected
- We use auto decision making in limited circumstances to: calculate any account fees; and to prevent and detect financial crime.
- We use your personal data to help us provide great customer service. To do this we customise our communications to provide information about the products and services most relevant to you. This is called profiling.

# Equiniti Financial Services Limited (EFSL) Privacy Notice

May 2018

We understand how important your personal data is and are committed to protecting and respecting your privacy.

**‘Personal Data’** means any information relating to or which identifies you. This can include items such as your name, address, phone number, identification numbers (such as an account number or your national insurance number), location data or online identifiers. Personal data can be held electronically or in certain paper records.

The General Data Protection Regulation (GDPR) regulates the processing of personal data. The GDPR seeks to protect your rights to your personal data by setting out, amongst other things, the conditions under which the processing of personal data is lawful, the rights of data subjects and the standards that organisations handling personal data must adopt. This Privacy Notice is issued in compliance with GDPR and seeks to explain:

1. Who we are;
2. Products and services covered by this Privacy Notice;
3. How we collect your personal data;
4. Why we collect your personal data;
5. How long we hold the personal data ;
6. The conditions under which we can share it with others;
7. Overseas processing;
8. How we keep your personal data secure;
9. Your personal data **rights** and how to exercise them;
10. Useful information; and
11. Any further questions.

## 1 Who we are

Equiniti Financial Services Limited (EFSL) is one company within the Equiniti Group, and is authorised and regulated by the Financial Conduct Authority. Our main business is investment and general insurance services. Our registered address is Aspect House, Spencer Road, Lancing, West Sussex, BN99 6DA and our ICO registration number is: Z1028420.

EFSL is a **‘Data Controller’**. This means that we are responsible for deciding how and why we hold and use personal data about you.

In this Privacy Notice, ‘we’, ‘us’ and ‘our’ will always mean EFSL, as Data Controller. Selftrade is a trading name of EFSL.

If you have questions about your products and services please contact your relevant Customer Experience team:

Selftrade accounts and selftrade.co.uk	0345-070-0720
Shareview Investment Account / Equiniti ISA	0345 300 0430
Certificated dealing	0345-603-7037
Equiniti Corporate Dealing	+44 (0) 808 100 1045
Dividend Re-Investment Plans - DRIPs	0371-384-2268
Corporate Sponsored Nominee	0371-384-2030
Global Nominee (Premier)	0345-600-8824
General enquiries	0345-607-6838

## 2 Products and services covered by this Privacy Notice

This notice applies to all of the following EFSL products, services and website.

- Shareview Investment Account / Equiniti ISA
- Selftrade dealing account/ISA /Child Trust Fund / Investment Club
- Selftrade SIPP - in conjunction with the SIPP Trustee, which has its own separate Privacy Notice (available in our privacy hub)
- Selftrade Panel SIPPs - in conjunction with your chosen SIPP Trustees, who will have their own separate Privacy Notice
- Certificated dealing
- Equiniti Corporate Dealing
- Custodian arrangements
- Dividend Re-Investment Plans - DRIPs
- Corporate Sponsored Nominee
- Global Nominee (Premier)
- Depository Interests
- Selftrade.co.uk

## 3 How we collect your personal data

The personal data we hold includes your name, postal address, email address and phone number, date of birth, financial information and for some accounts and transactions,

additional information about you such as your National Insurance Number and Nationality to enable us to provide you with our products and services.

We use many different kinds of personal data dependent upon the relationship you have with us and the products and services that you use. And we collect it through a variety of different ways:

#### Information you provide to us

- By using our website(s) and mobile device apps;
- By corresponding with us by post, phone, e-mail, live-chat or otherwise;
- Application and registration forms/identification documentation; and
- Entering competitions, promotions or surveys.

#### Information we collect about you when you use our services

- Information about the transactions and investments you make whilst using our products and services, including financial data;
- Information about how you logged on and off of our website, including your IP address, information about your visit, your browsing history, your device information and how you use our website. This will include the capture of your location information – [please see our cookie policy for further information on this](#);
- Information on what you view, click on and access in and through our marketing emails and text messages. This includes the geographic location of the device you have used – [please see our cookie policy for further information on this](#);
- Images and voice recordings of your communications with us for quality control, training, security and regulatory purposes, but these can also capture your location i.e. use of home landline number; and
- If you contact us via social media, we collect details from your social media account.

#### Information we receive from third parties

- As part of our identity and financial crime checking procedures with credit reference agencies, fraud detection agencies and registration or stockbroking industry exchanges as well as public information sources;
- Market researchers;
- From third parties when you have instructed or agreed for them to pass information to us, such as:
  - Your employer if you are using our services as part of or following an employee benefit scheme or are subject to personal dealing reporting;
  - Your broker, agent, Trustee or Investment Company and companies that introduce you to us;
- For the CSN and DRIP, where Equiniti Limited as share registrar is informed of a change in details on the share register linked to your account, these updates will also be applied to your account to ensure we maintain accurate records; and
- From online advertising networks (for example Google) through whom we place advertisements. The information we obtain varies from network to network. It summarises the actions of lots of people and so does not enable us to identify you

individually. It relates to what you view, click on, and access through websites in their network, including the subject matter of the website you started at and where you subsequently go. It can also include their analysis of your behaviour across the wider internet and a profile of you. If you are unhappy about this happening you should look out for 'settings' and 'Do Not Track' options in online advertisements and in the privacy and cookies functionality on your devices and consider changing your setting to block third party cookies in particular. We do not control the information on you that such networks obtain, or the technology they use to do so.

Special types of data - The law and other regulations treat some types of personal information as special. We will only collect and use this information if the law allows us to do so:

- Criminal convictions and offences.
- Genetic and bio-metric data.
- Health data including gender.
- Racial or ethnic origin.
- Religious or philosophical beliefs.
- Trade union membership.

Keeping your personal data up to date

It is important to us that the personal data we hold about you remains accurate and up to date at all times, but we need your help in doing this. Please help us by ensuring that you review the information held about you regularly and let us know as soon as anything needs updating or correcting.

Other people's personal data

The information you give us in your application form or other related documents, or that we collect through your use of our services, may contain your or another person's personal data. If you provide us with information about another person, you confirm that they have appointed you to act for them, they consent to you providing their personal data to us and any processing of their personal data and that you have informed them of our identity and the purpose for which their personal data will be processed – as set out in this Privacy Notice.

## 4 Why we collect your personal data

In the table below we demonstrate why and how we use your personal data as well as providing the legal reasons which we rely upon.

Under Data Protection legislation we must always have a legal reason for processing your personal data. One of the legal reasons is when we use your personal data for our

legitimate interests, this is usually when we have a business reason, however, we must always ensure that we take your interests into consideration too, and ensure that the use is fairly balanced. We tell you below when we rely on legitimate interests and what our legitimate interests are.

Why we use your personal data	How we use your personal data	Our legal reasons for using your personal data
<b>Provision of Financial Services, including the administration and management of customer records</b>	<ul style="list-style-type: none"> <li>○ To manage and operate your account with us to facilitate the provision of products and services, this includes retaining records of your instructions and telephone calls and keeping your account records up to date.</li> <li>○ To complete any transaction that you instruct us to undertake, and any legal obligations we have in relation to the transactions. As part of account opening, we are legally obliged to confirm your identity before we can accept your application.</li> <li>○ To provide you with transaction records / confirmation notices and statements as required by the service.</li> <li>○ To respond to any complaints and / or data rights that you invoke.</li> <li>○ To notify you about changes to our service and to send you service emails relating to your account.</li> <li>○ Processing our fees, charges, and any interest due on your accounts. Enforcing or obtaining settlement of debts owed to us or in relation to investments made on your behalf.</li> <li>○ For certain types of accounts, we also define our customers to facilitate the calculation of fees.</li> <li>○ To keep our websites and portals secure and permit you safe access to our services.</li> </ul>	<ul style="list-style-type: none"> <li>○ As part of contract preparations and obligations between us and you.</li> <li>○ With your consent.</li> <li>○ To comply with legal requirements placed upon us, such as the Financial Conduct Authority and Financial Crime regulations.</li> <li>○ Our legitimate interests, such as the proper administration of our service and business, for example: <ul style="list-style-type: none"> <li>● Keeping our records up to date.</li> <li>● Defining types of customers for new products and services.</li> <li>● Seeking your consent when we need it to contact you.</li> <li>● Operating efficiently.</li> <li>● Enabling and monitoring your use of our website and services.</li> <li>● To meet our regulatory requirements</li> <li>● To identify when you are no longer able to use the product or service in accordance with the terms and conditions; or to restrict your account to meet product restrictions</li> </ul> </li> </ul>

<p><b>Prize draws, offers, marketing of our products and services</b></p>	<ul style="list-style-type: none"> <li>○ To allow you to participate in interactive features of our service, when you choose to do so.</li> <li>○ Identifying if any of our products or services may be of interest to you and making suggestions and recommendations to you about them.</li> <li>○ To provide you with the information, products and services that you request from us via your chosen channel.</li> <li>○ To administer any prize draws that you are offered and elect to enter as an incentive to operate your account, for example as part of electing to receive dividends by BACS rather than by cheque.</li> <li>○ To ask you if you wish to hear from other entities within the Equiniti Group of Companies that offer complimentary financial services such as foreign exchange services.</li> <li>○ We can ask you from time to time to confirm or update your choices, such as when there is a change in the law or the structure of our business.</li> </ul> <p><b>IMPORTANT</b> You can withdraw from EFSL marketing and / or prize draw offers at any time. Please contact us if you wish to update your preferences.</p> <p><b>EXCEPTIONS</b> In limited circumstances, and dependent upon the account that you hold, you may receive marketing communications from the company which you hold shares in. This marketing will be clearly marked as issued by the company, however, another part of the Equiniti group of companies may assist in the delivery of those messages. In these instances you will need to opt out of marketing with the company concerned using the details contained within the message as they are not EFSL marketing messages.</p>	<ul style="list-style-type: none"> <li>○ With your consent.</li> <li>○ When we have collected your personal data when applying for, or enquiring about, a product or service, provided you could “opt-out” of receiving marketing communications at the time we collected your personal data and have been advised on how to easily do this in our subsequent communications with you for example using an ‘unsubscribe’ button at the bottom of emails.</li> <li>○ Our legitimate interests, namely - the proper administration of our service and business for example: <ul style="list-style-type: none"> <li>● Keeping our records up to date.</li> <li>● Defining types of customers for new products and services.</li> <li>● Seeking your consent when we need it to contact you.</li> <li>● Operating efficiently.</li> <li>● Enabling and monitoring your use of our website and services.</li> </ul> </li> </ul> <p><b>IMPORTANT</b> Please also refer to the exceptions noted in the marketing section of this Privacy Notice.</p>
<p><b>Profiling</b></p>	<p><u>Understanding our customers:</u> We can place you into groups of customers with similar interests, account patterns and preferences. These are called customer segments. We can also use a customer insight technique which analyses past observations to predict future behaviour. This is</p>	<ul style="list-style-type: none"> <li>○ Our legitimate interests, such as the proper administration of our service and business, for example: <ul style="list-style-type: none"> <li>● Keeping our records up to date.</li> </ul> </li> </ul>

	<p>called propensity modelling. These activities are used to predict how we can best deliver our service to you as well as tailor our product or service offerings and contact you efficiently and effectively with information that is relevant to you.</p> <p>You can ask us to stop profiling at any time – see section 9 - Your Rights.</p>	<ul style="list-style-type: none"> <li>• Defining types of customers for new products and services.</li> <li>• Seeking your consent when we need it to contact you.</li> <li>• Operating efficiently.</li> <li>• Enabling and monitoring your use of our website and services.</li> <li>• To meet our regulatory requirements.</li> </ul>
<b>Automated decision making</b>	<p>We use personal data to help us make automated decisions based on the personal data that we hold about you, or are permitted to collect from others. Common examples of when we do this are noted below:</p> <ul style="list-style-type: none"> <li>○ <u>Account Opening</u>: We are required to check that you meet the requirements of the account you have selected, to do this we can use, and validate, personal data about you such as your age, residency, nationality and financial position.</li> <li>○ <u>Account Pricing</u>: We can analyse the transactions you have undertaken in a predetermined period to calculate what we charge for some products and services.</li> <li>○ <u>Credit checks</u>: We use credit reference agencies for account purposes including confirming your identity or implementing trading limits. The decisions we make are based on the information you have supplied, that we already hold and from the credit reference agencies who separately hold information about you, or from policy decisions taken by Banks, card and payment processing centres. This includes rejecting trades if they fall outside of your agreed trading limit. To resolve any issues arising you may have to speak to these agencies directly.</li> </ul> <p>You can ask to have one of our staff to review any automated decision about you at any time – see section 9 - Your Rights.</p>	<ul style="list-style-type: none"> <li>○ As part of contract preparations and obligations between us and you.</li> <li>○ With your consent.</li> <li>○ To comply with legal requirements placed upon us, such as the Financial Conduct Authority and Financial Crime regulations.</li> <li>○ Our legitimate interests, such as the proper administration of our service and business, for example: <ul style="list-style-type: none"> <li>• Keeping our records up to date.</li> <li>• Defining types of customers for new products and services.</li> <li>• Seeking your consent when we need it to contact you.</li> <li>• Operating efficiently.</li> <li>• Enabling and monitoring your use of our website and services.</li> <li>• To meet our regulatory requirements.</li> </ul> </li> </ul>

<b>Assessment and collection of taxes</b>	<p>To deduct the relevant tax and duties (such as stamp duty, dividend tax and income tax) and submit returns to the relevant regulatory authorities.</p> <p>For some products, this is achieved through our liaison with your employer.</p>	<ul style="list-style-type: none"> <li>○ As part of contract preparations and obligations between us and you.</li> <li>○ With your consent.</li> <li>○ To comply with legal requirements placed upon us, such as the Financial Conduct Authority.</li> <li>○ To meet our regulatory requirements.</li> </ul>
<b>Financial crime</b>	<p><b>Financial crime and money laundering:</b> We analyse your personal data for financial crime, money laundering and fraud risk purposes in accordance with UK and EEA regulations which are placed upon us. This can include:</p> <ul style="list-style-type: none"> <li>○ Confirming your identity (through the use of Credit Reference agencies – see above).</li> <li>○ Verifying your bank details.</li> <li>○ Using fraud prevention agencies. We study and learn about how you use our products and services and use this information to better detect fraud or unusual activities. We do this with fraud prevention agencies.</li> <li>○ Analysing our databases, investigating, detecting and report financial crimes as well as taking measures to prevent financial crime.</li> <li>○ Developing and improving our financial crime controls.</li> <li>○ Managing financial risks both to us and to you.</li> </ul>	<ul style="list-style-type: none"> <li>○ As part of contract preparations and obligations between us and you.</li> <li>○ With your consent.</li> <li>○ To comply with legal requirements placed upon us, such as the Financial Conduct Authority and Financial Crime regulations.</li> <li>○ Our legitimate interests, such as the proper administration of our service and business, for example: <ul style="list-style-type: none"> <li>● Keeping our records up to date.</li> <li>● Operating efficiently.</li> <li>● Enabling and monitoring your use of our website and services.</li> <li>● To meet our regulatory requirements.</li> </ul> </li> </ul>
<b>Improving our products and services</b>	<ul style="list-style-type: none"> <li>○ To identify service improvements such as when troubleshooting, undertaking data analysis, testing new products, using your personal data for research, statistical and survey purposes.</li> <li>○ To ensure that content from our websites are presented in the most effective manner for you and for your device.</li> <li>○ To develop and manage our products, brands and services and to calculate how we should structure any fees and charges.</li> <li>○ How we manage and work with other companies in the delivery of your products and services.</li> </ul>	<ul style="list-style-type: none"> <li>○ As part of contract preparations and obligations between us and you.</li> <li>○ With your consent.</li> <li>○ To comply with legal requirements placed upon us, such as the Financial Conduct Authority and Financial Crime regulations.</li> <li>○ To meet our regulatory requirements</li> <li>○ Our legitimate interests, such as the proper administration of our service and business, for example:</li> </ul>

	<ul style="list-style-type: none"> <li>○ To study how you and our other customers use our products and services.</li> <li>○ To measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you, which can be based on your activity on our website(s) or the website of another Equiniti Company or third parties' websites. We can do this ourselves or appoint an agency to do this on our behalf.</li> </ul>	<ul style="list-style-type: none"> <li>● Keeping our records up to date.</li> <li>● Defining types of customers for new products and services.</li> <li>● Seeking your consent when we need it to contact you.</li> <li>● Operating efficiently.</li> <li>● Enabling and monitoring your use of our website and services.</li> </ul> <p>Some of this information will be gathered by cookies that you have consented can access your computer. <a href="#">Please see our cookie policy for further information on how to manage cookies.</a></p>
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#### If you choose not to give personal information

We need to collect personal information required by law or under the terms of a contract we have with you. If you choose not to give us the personal data we need it can mean that we have to cancel or decline a product or service that you request or have with us. So that you know what information is optional, we make it clear at the time we collect your personal data.

## 5 How long we hold your personal data

Personal data will not be retained for longer than necessary for us to achieve the purpose for which we obtained your personal data. We will then either securely delete it or anonymise it so that it cannot be linked back to you. We review our retention periods for personal data on a regular basis.

The provision of these products and services are subject to legal and regulatory retention periods. These vary between products, and the type of data involved. Within this framework the maximum time we will retain any of your personal data will be the duration of the contract and for a period of up to 12 years following the completion of the contract, for the reasons noted below:

- To respond to enquiries and complaints;
- To demonstrate that your instructions were carried out properly; and
- To maintain records to meet rules and regulatory requirements that are applicable to the administration of the contract.

We can keep your data for longer than 12 years if we cannot delete it for legal, regulatory or technical reasons. We can also keep it for research or statistical purposes. If we do, we will make sure that your privacy is protected and only use it for those purposes.

**For full details of our retention policies, please contact us.**

## 6 The conditions under which we can share your personal data with others

The information we hold about you is confidential and we will only share your personal information to enable us to deliver the product(s) or service(s), examples are as follows:

- At your request, or with your consent or the consent of any party linked to your product or service;
- Other Equiniti Group entities who help us deliver our products and services, such as Equiniti Limited, EQ Data and Equiniti India Private Limited;
- Non Equiniti entities, such as our agents in connection with running accounts and services for you, including:
  - Banks and other payment service providers to make and receive payments.
  - Printers in order to supply you with documentation and statements.
  - Insurance companies - where we need to provide details of your account when we or the corporate issuer make a claim.
  - Stockbrokers and market makers who execute transactions we make on your behalf.
  - Service suppliers to facilitate email, IT and administration services.
  - Our professional advisors, for example, our lawyers and technology consultants, when they need it to provide advice to us.
  - Your employer or agent(s), in accordance with any specific instructions you provide to us, or where it is required for the employer to report the information for tax purposes.
  - Third party providers, for example, your SIPP Trustee, when you have requested their services.
  - Credit reference agencies and fraud detection agencies as part of our identification procedures.
  - To the corporate issuer so that they can provide shareholder offers on the same basis as a direct shareholder.

- Market Research Agencies to measure or understand the effectiveness of advertising we serve to you and others. We can do this ourselves or appoint an agency to do this on our behalf. This will include your use of social media sites.
- Your Official Receiver or appointed insolvency practitioner if we receive notice of your insolvency, bankruptcy or insolvency proceedings / arrangement.

We will only transfer your personal information to trusted third parties who provide sufficient security guarantees and who demonstrate a commitment to compliance with applicable law and this policy. Where third parties are processing personal information on our behalf, they will be required to agree, by contractual means, to process the personal information in accordance with the applicable law. This contract will stipulate, amongst other things, that the third party and its representatives shall act only on our instructions, or as permitted by law.

We are also required to share your personal data with external third parties as follows (but not limited to):

- Regulators and supervisory authorities e.g. Her Majesty's Revenue and Customs (HMRC), domestic or foreign tax authority, the Department for Work and Pensions (DWP), Her Majesty's Courts and Tribunals Service (the courts), Tax advisors, Credit Industry Fraud Avoidance System (Cifas); Financial Ombudsman Service (FOS), the London Stock Exchange plc or the operator of any market on which you hold investments, as part of our legal obligations in providing the products / services;
- Where the law requires or permits disclosure, or there is a duty to the public to reveal it. This includes to the issuer of shares when they make a request for details of the underlying holders;
- When we need to defend or exercise our legal rights or those of a third party;
- Debt collecting, debt chasing or another agent for enforcing payment of monies owed to us;
- Efforts to trace you if we lose contact with you e.g. to reunite you with your assets;
- Police and other law enforcement agencies for the prevention and detection of crime and where a valid permission is applicable;
- As a result of a court order or other regulatory instruction;
- Our insurers and insurance brokers where required for underwriting our risks and as part of ongoing risk assessments;
- For company sponsored products – to 'the company or their agents' (as defined within the products Terms and Conditions) for general business purposes such as checking if you are an existing data subject of the company, the company's business administration purposes and to facilitate the company's development and improvement of their products and services;
- For individuals subject to personal account dealing regulations – when we are advised by you or your employer that personal account dealing reporting requirements are in place, we will notify your employer of relevant trades and transactions on your account; and

- We can 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. At all times, we take steps to ensure your privacy rights continue to be protected as per this Privacy Notice.

## 7 Overseas Processing

Personal data will be shared with members of the Equiniti Group outside of the European Economic Area (EEA) and the European Union (EU), including Equiniti India Private Limited which is based in India, for the purposes described in this Privacy Notice. For these transfers we utilise Model Clauses recognised by the European Commission.

Personal data will also be shared outside of the EEA and EU for the purposes of contacting you via email via our email service provider in the United States of America. For these transfers, we utilise Model Clauses recognised by the European Commission.

If you would like to obtain a copy of the Model Clauses we use to share personal information within the Equiniti Group or our email service provider, please contact our Data Protection Officer using the details provided in this Privacy Notice.

Please note that information protection laws do vary from country to country. In particular, the law of the country in which you are resident or domiciled may offer a higher standard of protection than the laws in the United Kingdom and / or those other countries in which we store and use the personal data we collect. Our transfer of personal data to other countries could result in that personal data being available to governments and other authorities in those countries under their laws.

**By using our Service, you agree to this international transfer, storing and processing.**

## 8 How we keep your personal data secure

We understand how important your personal data is to you and we take appropriate steps to ensure that it remains secure.

We safeguard your personal data across all our computer systems, networks, websites, and offices as much as possible through appropriate procedures and technical security measures (including strict encryption, anonymisation and archiving techniques) and our Information Security policies are aligned to ISO27001, which is an internationally recognised security standard.

We also use secure ways of communicating with you such as when collecting your personal data or providing your account information:

- online through the use of “https” and other security and encryption protocols. This is indicated by a lock icon on the bottom of the web browser, or the address will include the letters https in the top left-hand corner.
- by telephone we will always ask you security questions to confirm your identity before we discuss matters relating to your account(s).

Where we have given you (or where you have chosen) a password or unique identifier (PIN) which enables you to access certain parts of our websites, you are responsible for keeping this password / PIN confidential, along with any username. We will never ask for your full password or PIN, and you must not divulge your full password to us or anyone else. We recommend that any password or PIN you set is not easily guessable, and changed frequently (at least once a month).

Because we cannot guarantee the confidentiality of personal data sent on the internet you should never send your login details via email.

### Security concerns

If you ever receive a communication from us by post, email or by phone that you are concerned it is not genuine, please contact us using the contact details in section 1.

You must immediately inform us if you become aware, or suspect, that someone else has knowledge of your account details.

If you have any concerns about the security of your own personal computers and mobile devices, we suggest you read the advice of Get Safe Online, which can be accessed at [www.getsafeonline.org](http://www.getsafeonline.org).

## 9 Your personal data rights and how to exercise them

You have rights in respect of the personal data that we hold about you. They include the right to request a copy of the information that we hold about you, to know about any automated decisions that are made about you and to change your marketing preferences at any time. Details about all of your rights are provided below.

Some of these rights are conditional and depend upon why we are processing your personal data. This means that we cannot always be able to respond to your request in the way that you want. For example:

- If you ask us to erase your personal data and we are processing the information because we are required to do so because of a legal requirement, we will not be able to delete your personal data;
- However, if you ask us to erase your personal data and we are processing the information because you provided us with consent (for example as part of a survey response), we will be able to consider and respond to your request.

Your rights	Explanatory detail
The right to be <b>informed</b> about how we use your personal data.	This Privacy Notice provides you with the details on how we use and process your data.
The right of <b>access</b> to a copy of any personal data EFSL processes about you, together with certain additional information.	If you request to see your personal data, your initial request will be free of charge; subsequent requests may attract an administration fee. The additional information includes details of the categories and recipients of the personal data. Providing the rights and freedoms of others are not affected, we will supply to you a copy of your personal data.
The right to request us to <b>rectify</b> or update it.	This will be relevant where the personal data we hold is or has become inaccurate or incomplete, taking into account the purposes of the processing. Please explain why you consider the data inaccurate or incomplete.
The right to request us to <b>erase</b> your personal data in certain circumstances.	The circumstances when erasure can apply include when we no longer need it to meet a lawful basis for processing unless that basis is consent and you withdraw your consent <b>or</b> you object to the processing <b>or</b> the processing is unlawful. However, certain exclusions apply - where the processing is necessary for compliance with a legal obligation <b>or</b> to establish, exercise or defend legal claims.
The right to request us to <b>restrict</b> processing it.	This request can be used to stop us processing your personal data: if you disagree over the accuracy of the personal data until we have verified the data; the reason

	for processing; or if you wish us to retain your personal data for longer than our retention period, e.g. to establish, exercise or defend a legal claim.
The right to request a copy of your information for data <b>portability</b> purposes.	If you have provided personal data to us under <u>contract</u> <b>or</b> because you <u>consented</u> to the processing <b>and</b> <u>use the data by automated means</u> , then you have the right to instruct us to transmit that personal data to you or another data controller in a machine-readable format.
The right to <b>object</b> to us processing your personal data.	<p>You have a right to object to us processing your data where we are processing it for the purpose of legitimate interests. You can also object to direct marketing communications from us about products, offers, competitions, or services and any profiling that we can perform in relation to direct marketing. You can do this at the point of data collection, through the use of any opt-out functionality on text and emails, via your preference centre or by contacting the helpline service.</p> <p>You can update your marketing preferences at any time through the use of the opt-out functionality.</p> <p>You have the right to withdraw your consent at any time. However, this will not affect the lawfulness of processing before the withdrawal.</p> <p>If you would like to receive the marketing described above, please ensure you have indicated your preferences accordingly.</p>
Rights related to decisions based solely on <b>automated processing</b> .	Where this processing produces legal effects or significantly affects you, you can object to this processing unless the processing is necessary as part of our contract, <b>or</b> is required by legislation.
Right to lodge a <b>complaint</b> with a supervisory authority.	<p>If you wish to raise a complaint on how we have handled your personal data, please contact our Data Protection team who will investigate the matter and report back to you.</p> <p>If you remain unsatisfied with our response or believe we are not processing your personal data in accordance with the law, you are able to contact the data protection authority in your country. In the UK, it is the Information Commissioner's Office (ICO) who regulates Data Controllers compliance with data protection legislation. They can be contacted by email: <a href="mailto:casework@ico.org.uk">casework@ico.org.uk</a>; post: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF; or by telephone: 0303 123 1113.</p>

## 10 Useful information

### 10.1 - Children (16 years and under) and Vulnerable Adults

We are committed to the privacy protection of children and vulnerable adults. If you are aged 16 or under, and we need to process your personal data you must obtain the permission of your parent/guardian **before** you share your personal data with us. If we are notified that you are a vulnerable adult we will liaise with your authorised representative, once we are in receipt of the appropriate permissions.

### 10.2 - Use of 'cookies'

Cookies are text files placed on your computer to track visitor use of the website and to compile statistical reports on website activity. This helps us to improve our website and deliver a better more personalised service.

You can switch off cookies by setting your browser preferences. However, turning cookies off will result in a loss of functionality when using our website. For more information on how to switch off cookies on your computer, [please see our cookie policy](#).

### 10.3 - Links to other websites

Our websites contain links to other websites run by other organisations, or other Equiniti companies. This Privacy Notice applies only to EFSL websites, where the link appears. When you are on another website, we encourage you to read their privacy statements as it will take precedence over this Privacy Notice.

We are not responsible for the privacy policies and practices of other sites.

### 10.4 - Social media, blogs, reviews, and similar services

Any social media posts or comments you make to us (e.g. on our own Facebook page) will be shared under the terms of the relevant social media platform (e.g. Facebook or Twitter) on which they are made and could be made public by that platform. These platforms are controlled by other organisations, and so we are not responsible for this sharing. You should review the terms and conditions and privacy policies of the social media platforms you use to ensure you understand how they will use your information, what information relating to you they will place in the public domain and how you can stop them from doing so if you are unhappy about it.

Any blog, review or other posts or comments you make about us, our products and Services on any of our blog, review or user community services will be shared with all other members of that service and the public at large.

You are responsible for ensuring that any comments you make comply with any relevant policy on acceptable use of those services.

### 10.5 Changes to this policy

We review our use of your personal data regularly. In doing so, we can change what personal data we collect, how we keep it and what we do with it. As a result, we can change this Privacy Notice from time to time to keep it relevant and up to date.

We will endeavour to alert you to these changes so that you can check you are happy with it before proceeding any further. Please look out for notices from us alerting you to these changes, via our websites or other timely communications. If you use our website and see such an alert, please take a moment to ensure that you're happy with any changes.

By continuing to use our products and services, you will be bound by this Privacy Notice.

However, we will also tell you of the changes where required by law to do so.

This policy was issued 11 May 2018. If you require copies of previous versions of the EFSL Privacy Notices, please contact the Data Protection Officer using the contact details noted below.

## 11 Any further questions about this Privacy Notice

We hope that this Privacy Notice has been helpful in setting out how we handle your personal data and your rights to control it. If you have any questions that remain unanswered, please contact our Data Protection Officer:

- By email at [DPO@equiniti.com](mailto:DPO@equiniti.com),
- By post at Data Protection Officer, Equiniti, Highdown House, Yeoman Way, Worthing, BN99 3HH, or
- By telephone UK: 0333 207 5962 International: +44 121 415 0196  
Lines are open 8.30am to 5.30pm (UK time), Monday to Friday (excluding public holidays in England and Wales).