



# QUILTER CHEVIOT PRIVACY AND COOKIES POLICY

## PRIVACY AND COOKIES POLICY

We, our subsidiaries and parent companies are committed to protecting and respecting your privacy.

This policy (together with our [website terms](#)) sets out the basis on which:

(1) we will process any personal data we collect from you, or that you give us; and (2) we use cookies. Please read the following carefully to understand our views and practices.

There are various terms used in this policy which come from the UK Data Protection Act 1998. We use terms defined in the UK Data Protection Act 1998 in this policy (such as 'personal data'). For the purposes of this policy, 'the data controller' (the organisation responsible for processing your information) is Quilter Cheviot Limited of One Kingsway, London WC2B 6AN, UK.

## INFORMATION WE MAY COLLECT FROM YOU

We may collect and process the following information about you.

- Information that you provide by filling in forms on our website [www.quiltercheviot.com](http://www.quiltercheviot.com) (and associated sites) (together, **our website**).
- Information when you report a problem with our website.
- If you contact us, we may keep a record of that correspondence.
- We may also ask you to complete surveys that we use for research purposes.
- Details of your visits to our website and the resources that you access.
- We may monitor, record, store and use any phone, email or other communication with you (to check any instructions given to us, for training purposes, to prevent crime and to improve the quality of our customer service). These recordings are our property and we may also use them in evidence if there is a dispute or for any other matter.

## IP ADDRESSES

We may collect information about your computer, including where available your IP address, operating system and type of browser, so that we can manage our system and to report information to our advertisers. This is statistical data about your browsing actions and patterns, and does not identify you.

## COOKIES

The search engine on our website is run by a piece of hardware (a search 'appliance') supplied by Google that is plugged into our server and continuously indexes the content on our site. This appliance handles all search requests and no personal information is passed on to anyone else, including to Google.

We and other people acting on our behalf use cookies and similar technology on our website to collect information from visitors to our website. Cookies are small, usually randomly encoded, text files that help your browser navigate through our website. Our website will generate the cookie file when you access our website. Your computer's browser software then accepts it and processes it (if you haven't disabled cookies). The cookie file is stored in your browser's folder or subfolder.

Cookies allow us to put together statistical information about how you use our website, including information relating to the frequency of visits, IP addresses, the average length of visits, which pages you view during a visit, the effectiveness of advertising on our website, authentication information, whether you accept or reject our website terms, periods of inactivity, time zones, language preferences and other regional information.

We and other people acting on our behalf use this cookie information to:

- improve our website content and performance;
- estimate our audience size and usage pattern;
- speed up your searches;
- allow you to log in and authenticate who you are when you log on;
- recognise you when you return; and
- deliver a better and more personalised service by allowing us to customise our site according to your interests.

Our website gives existing clients the facility to use a cookie for the online account facility. This allows you to choose to save your user ID and password on your computer. When you next access the online facility from the same computer, your user ID and password will automatically appear.

We keep the information held in cookies we have set to a minimum and only we, our associate businesses, their authorised third parties or someone who has access to your personal computer can read it. Many web browsers allow you to control the use of most cookies through their browser settings. To learn more about cookies, including information on what cookies have been set on your computer and how you can manage and delete them, visit [www.allaboutcookies.org](http://www.allaboutcookies.org).



Unless you have adjusted your browser setting so that it rejects cookies, our system will issue cookies when you access or use our website. By accessing or using our website you are agreeing to us using cookies. If you refuse to accept cookies by adjusting your browser setting, some or all areas of our website may not function properly or may not be accessible.

## WHERE WE STORE YOUR PERSONAL INFORMATION

The information that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area (EEA). It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. These staff may, among other things, provide support services. By providing your personal information, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to make sure that your information is treated securely and in line with this privacy policy.

Unfortunately, sending information over the internet is not completely secure. Although we will do our best to protect your personal information, we cannot guarantee the security of it when sending it to our website or by email. If you do this, it is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

## HOW WE USE THE INFORMATION

We use information about you which we have collected through our website in the following ways.

- For statistical analysis.
- To make sure that content from our website is presented in the most effective way for you and for your computer.
- To provide you with information, products or services that you ask for from us or which we feel may interest you (if you have agreed to be contacted for these purposes).
- To carry out our obligations arising from any contracts entered into between you and us.
- To allow you to take part in interactive features of our service.
- To tell you about changes to our service.

We may use the information we have collected about you through our website, or allow certain other organisations to use your information, to provide you with information about goods and services which may interest you, or we or they may contact you about these. We may communicate with you on our website and may provide you with online access and, where appropriate, communicate with you by email, phone. If you do not want to be contacted by any of these methods, please tell us.

If you are an existing client, we will only contact you by email or telephone with information about goods and services similar to those which you have received from us.

If you are a new client, and where we allow certain other organisations to use your information, we (or they) will contact you by email or telephone only if you have agreed to this.

We may pass your information on to:

- your adviser or agent;
- other organisations your adviser has appointed to provide a service to them; or

- any securities, options or futures market or exchange on which we may deal or any related clearing house or the clearing agent (or to investigators, inspector or agents appointed by any of them) in providing services to you. We may also use your information specifically for processing you as a new client.

If you do not want us to use your information in this way, or to pass your details on to others for marketing purposes, please tell us.

## YOUR RIGHTS

You have the right to:

- (a) ask that we make changes to your personal information; and
- (b) ask us not to process your personal information for marketing purposes.

We will usually tell you (before collecting your information) if we plan to use your information for these purposes or if we plan to reveal your information to anyone else for these purposes. You can do this at any time by contacting us at General Counsel, Quilter Cheviot Limited, One Kingsway, London WC2B 6AN, UK.

## ACCESS TO INFORMATION

The UK Data Protection Act 1998 gives you the right to see information held about you as long as it would not involve too much effort to provide this information. You can do this in line with the UK Data Protection Act 1998. If you ask to see information, you may also have to pay a fee of £10 (or local currency equivalent) to meet our costs in providing you with details of the information we hold about you.

## REVEALING YOUR INFORMATION

We may reveal your personal information to any member of our group, which means our subsidiaries and our ultimate holding company and its subsidiaries (as defined in section 1159 of the UK Companies Act 2006).

We may reveal your personal information to others if:

- we sell or buy any business or assets, in which case we may reveal your personal information to the prospective seller or buyer of the business or assets;
- we or substantially all of our assets are bought or taken over by another organisation, in which case personal information held by us about our customers will be one of the transferred assets;
- we are under a duty to reveal or share your personal information to keep to laws, regulation, rules and codes which apply, or to enforce or apply our website terms and other agreements; or
- we need to protect our rights, property or safety, or those of our customers or others. This includes sharing information with other companies and organisations for the purposes of preventing fraud and reducing credit risk, and with others who perform certain tasks or services on our behalf.

## CHANGES TO OUR PRIVACY POLICY

Any changes we may make to our privacy policy in the future will be posted on this page using a new version of this policy.



## WEBSITE SECURITY

To maintain the security of our systems, protect our staff and detect fraud and other crimes, we can monitor all internet communications, including web and email traffic, into and out of our website domains. This monitoring includes, but is not limited to, checks for viruses and other malignant codes, criminal activity and use or content which breaks our policies. We can also decide not to deliver any communication that breaks our policies.

## THE COOKIES WE USE

*Strictly necessary cookies* – these are cookies that we need to operate our website. They include, for example, cookies that allow you to log in to secure areas of our website.

*Performance cookies* – these cookies allow us to recognise and count the number of visitors to our site, and to see how these users navigate through the site while they are using it. This information helps us to improve the way our website works (by, for example, allowing us to see if visitors can easily access the information they need) and allows us to evaluate how any advertising campaigns have performed.

*Functionality cookies* – these are used to recognise when users return to our website. This allows us to personalise our content, greet you by name and remember your preferences (for example, your choice of language or region).

*Targeting cookies* – these cookies record your visit to our website, the pages you have visited and the links you have followed. We may use this information to make our website and the advertising displayed on it more relevant to your interests, or to register when you have opted out of a particular service. We may also share this information with other organisations for this purpose.

### QUILTER CHEVIOT

Head Office  
One Kingsway  
London WC2B 6AN

**Please contact our  
Marketing Department  
on +44 (0)20 7150 4246  
or email [marketing@quiltercheviot.com](mailto:marketing@quiltercheviot.com)**

**Investors should remember that the value of investments, and the income from them, can go down as well as up and that past performance is no guarantee of future returns. You may not recover what you invest.**

Quilter Cheviot Limited is registered in England with number 01923571, registered office at One Kingsway, London WC2B 6AN. Quilter Cheviot Limited has established a branch in Dublin, Ireland with number 904906, is a member of the London Stock Exchange, is authorised and regulated by the UK Financial Conduct Authority, is regulated by the Central Bank of Ireland for conduct of business rules, under the Financial Services (Jersey) Law 1998 by the Jersey Financial Services Commission for the conduct of investment business in Jersey and by the Guernsey Financial Services Commission under the Protection of Investors (Bailiwick of Guernsey) Law, 1987 to carry on investment business in the Bailiwick of Guernsey. Accordingly, in some respects the regulatory system that applies will be different from that of the United Kingdom.

