



PRIVACY NOTICE

At Quilter Cheviot, we are committed to protecting your privacy and ensuring that your personal information is collected and used appropriately, lawfully and transparently.

This privacy notice explains:

- Who we are
- What personal information we collect
- How we use your personal information
- Who we share your information with and why
- How we keep your information secure
- Your rights
- How to contact us

WHO WE ARE

Quilter Cheviot Limited is registered in the UK and our registered address is at One Kingsway, London WC2B 6AN, UK and our company registration number is 01923571. We are a market-leading specialist in investment management with a tradition of providing financial services and investment solutions to investors for over 240 years. We focus primarily on structuring and managing bespoke discretionary portfolios for private clients, charities, trusts, pension funds and intermediaries.

In addition to our network of regional offices throughout the UK, we have also established a branch in Ireland with number 904906, a branch in Jersey with number 23676 and a Representative Office in the Dubai International Financial Centre with number 2084 (using the business name Quilter Cheviot Limited (DIFC Representative Office)). Accordingly, we are authorised and regulated by the UK Financial Conduct Authority; regulated by the Central Bank of Ireland for conduct of business rules; regulated by the Jersey Financial Services Commission for the conduct of investment business and funds services business and the Dubai Financial Services Authority as a Representative Office. We are also regulated 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.

More information about who we are can be found on our website www.quiltercheviot.com

WHAT PERSONAL INFORMATION WE COLLECT

We collect certain personal information about you which may include your name, address, phone number and other information. We collect this information about you when you:

- use our website and secure online services;
- contact us about our services;
- apply for and receive our services; or
- register to receive one of our newsletters.

The types of personal information we collect will depend on the purpose for which it is collected but may include:

- your contact details;
- information to verify your identity;
- information about your family, lifestyle and health;
- financial and bank details; and
- information about your employment and education.

We collect personal information directly from you. For example, we ask for personal information at the start of our relationship (eg: when you apply for one of our services) and in subsequent communications in order to check your identity. This is a legal requirement and is important to help safeguard you and us against potential crime.

Where we provide our services to trusts, we may collect personal information about the settlor, beneficiaries and trustees of that trust. Where we provide our services to companies we may collect personal information about the directors, shareholders and beneficial owners of the company. Where we provide our services to charities, we may collect personal information about the trustees or directors of that charity.

Where it is necessary, we collect more sensitive information (such as criminal convictions or detailed health information). If this is the case we will explain what information we require, why it is needed and where required, will ask you for consent.



We may also collect information about you from other sources such as:

- your adviser;
- another agent (if you have one);
- external third parties (eg: credit reference agencies to verify your identity); and
- from cookies (cookies are small text files that are placed on your computer by websites that you visit. They are widely used in order to make websites work, or work more efficiently, as well as to provide information to the website owners). To learn more about information collected through cookies, please view our Cookies Policy which can be found on the 'Important Information' page of our website.

We will keep your personal information only as long as is necessary for the purpose for which it was collected, or for longer if we are required to do so for legal or regulatory reasons. Personal information will be securely disposed of when it is no longer required in accordance with our Personal Data Retention and Disposal Schedule.

HOW WE USE YOUR PERSONAL INFORMATION

We process your personal information for the following purposes.

- 1** To perform our contract with you and to support and maintain our relationship. This includes the following:
 - assessing and processing an application for our services;
 - providing our services to you, including the management of our relationship with you and your adviser, or any other agent (if you have one);
 - carrying out transactions on your behalf;
 - monitoring or recording telephone calls with you to resolve any queries or issues or for regulatory reasons;
 - record keeping to ensure our services operate within the law and relevant regulatory requirements; and
 - providing other services (eg: enhanced due diligence, data hosting, online services, and payments or reporting of any tax or levy).
- 2** To comply with legal and regulatory requirements. These requirements include the following:
 - confirming your identity for regulatory purposes; and
 - detecting and preventing fraud, money laundering, terrorist financing, bribery or other malpractice.

3 For specific business purposes to enable us to provide you with appropriate services and a secure experience. Such business purposes include the following:

- verifying your identity for security purposes;
- sending marketing communications to you which you have opted into receiving or which we think may interest you based on the services you receive from us or other companies in our group;
- enhancing, modifying and personalising our services for your benefit;
- providing reports and other communications to you where we are required to do so;
- client satisfaction research or statistical analysis;
- audit and record keeping purposes;
- enhancing the security of our network and information systems; and
- maintaining effective management systems including internal reporting to our parent company and other members of our corporate group.

You have the right to object to us processing your personal information for the business purposes listed above but, if you do so, this may impact on our ability to provide some or all of our services to you.

WHO WE SHARE YOUR INFORMATION WITH AND WHY

We share your information with trusted third parties who perform tasks for us and help us to provide our services to you. We may also share your information with agencies where required by law, court order or regulation. These third parties include:

- other companies within the Quilter plc group;
- your financial adviser (and their Principal if they are an Appointed Representative), third party data providers used by your adviser and any other party authorised by you;
- those who perform tasks for us to help us provide our services to you (these third parties may be based in countries outside the EU);
- those who are able to verify your identity, in line with money laundering or other regulatory or legal requirements;
- organisations, including the police and fraud prevention agencies, to prevent and detect fraud;
- regulatory or governmental agencies or bodies such as the [UK Financial Conduct Authority](#), [Jersey Financial Services Commission](#), [Guernsey Financial Services Commission](#), [Central Bank of Ireland](#) and [Dubai Financial Services Authority](#);



- securities, options and futures markets and exchanges on which we may deal in connection with your account with us;
- a clearing house or clearing agent (or to investigators, inspectors or agents appointed by any of them) for the purpose of executing and settling transactions we have entered into on your behalf;
- investment or product providers who ask for that information in order to allow us to make investments on your behalf or to continue to provide our services to you;
- our appointed legal or regulatory advisers or auditors; and
- a prospective buyer (or its advisors), for due diligence purposes, if we are considering a sale of any of our business or assets.

HOW WE KEEP YOUR INFORMATION SECURE

We are committed to ensuring the confidentiality of the personal information that we hold about you and regularly review our security controls and related policies and procedures to ensure that your personal information remains secure.

When we contract with third parties we require them to have appropriate security, privacy and confidentiality measures in place to ensure that personal information is kept secure.

If we work with third parties in countries outside the EU we ensure that the European Commission has confirmed that such countries provide an adequate level of protection for personal information or that the third party has adequate safeguards in place and agrees to give your information the same level of protection as we would.

YOUR RIGHTS

You have the right to ask us:

- for a copy of the personal information we hold about you;
- to update or correct your personal information;
- to delete your information; and
- to restrict processing of your personal information where appropriate.

In certain circumstances you also have the right to:

- object to the processing of your personal information;
- object to any automated decision making and profiling; and
- data portability.

Information about your individual rights, including how to correct, restrict, delete, or make changes to your personal information, can be found on our website.

If you wish to request a copy of the personal information we hold about you please use our Data Subject Access Request (DSAR) form which is available on our website or we can provide on request.

More information about your data protection rights can be found on the website of the relevant data protection authorities set-out below:

www.ico.org.uk

www.oicjersey.org

www.dataprotection.ie

www.difc.ae/laws-regulations/data-protection

HOW TO CONTACT US

You may give and withdraw consent to the receipt of marketing information and tell us your communication preferences at any time. If you wish to change your preferences regarding the receipt of marketing or other communications from us, please contact marketing@quiltercheviot.com or telephone 020 7150 4000.

If you:

- wish to give or withdraw your consent for us to use your data;
- wish to update or correct your personal information;
- have questions about this notice; or
- need further information about our privacy practices,

please contact our Data Guardian by post at Quilter Cheviot Limited, One Kingsway, London, WC2B 6AN, by email at GDPR@quiltercheviot.com or by telephone on 020 7150 4000.

If you wish to raise a complaint about how we have handled your personal data, please contact our Group Data Protection Officer who will investigate the matter.

The Data Protection Officer
Old Mutual House
Portland Terrace
Southampton
Hampshire
SO14 7EJ

If you are not satisfied with our response you can complain to the Information Commissioner's Office:

The Information Commissioner's Office (ICO)
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF



QUILTER CHEVIOT

Head Office
One Kingsway
London WC2B 6AN

**Please contact our
Marketing Department
on +44 (0)20 7150 4000
or email 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 is a member of the London Stock Exchange, authorised and regulated by the UK Financial Conduct Authority. Quilter Cheviot Limited (DIFC Representative Office) operates in Dubai as a Representative Office at Unit 12, Level 13, The Gate Building, PO Box 121208, Dubai, UAE. DIFC Registered Number 2084. Quilter Cheviot Limited (DIFC Representative Office) is regulated by the Dubai Financial Services Authority as a Representative Office. DFSA Reference Number F03378. Quilter Cheviot Limited has established a branch in Dublin, Ireland with number 904906 and regulated by the Central Bank of Ireland for conduct of business rules and is regulated under the Financial Services (Jersey) Law 1998 by the Jersey Financial Services Commission for the conduct of investment business and funds services 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.



QUILTER CHEVIOT
INVESTMENT MANAGEMENT