

PRIVACY POLICY

PRIVACY POLICY - CROWN AGENTS INVESTMENT MANAGEMENT LIMITED

1. ABOUT THIS NOTICE

The purpose of this notice to make you aware of how and why Crown Agents Investment Management Limited (“CAIM”, “we”, “our”, or “us” within this notice), a UK regulated provider of investment management services will process your personal data.

For the purposes of this notice, CAIM will be classified as a “data controller”, as defined within the UK General Data Protection Regulation or “GDPR”. This means that we are responsible for how we process and use personal information about you.

CAIM respects your privacy and is committed to protecting your personal data. This privacy notice will inform you as to how we look after your personal data, tell you about your privacy rights and how the law protects you when you:

- Visit our website at www.caiml.co.uk (the “Website”) (regardless of where you visit it from);
- Provide consent for your data to be used for marketing and communications purposes.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

- If you have any questions about this privacy notice or you wish to exercise your privacy rights as set out in this notice, please contact our Data Protection Officer using the contact details set out below.

2. DATA PROTECTION PRINCIPLES

We will comply with data protection law and principles as set out in the GDPR, which means that your personal data will be:

- Used lawfully, fairly and in a transparent way;
- Collected only for valid purposes that we have clearly explained to you, and not used in any way that is incompatible with those purposes;
- Adequate and relevant to the purposes we have told you about and limited only to those purposes;
- Accurate and kept up-to-date;
- Kept only for as long as necessary for the purposes we have told you about; and
- Stored securely.

3. OUR COLLECTION AND USE OF YOUR PERSONAL INFORMATION

We collect personal data about you when you access our Website, register with us, and contact us. We collect this personal information from you either directly, or indirectly, such as through your browsing activity while on our Website (see 'Cookies' below).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

- Identity data, where you fill in a contact form, which includes your name, your email address, and any other personal data provided by you in your message to us. You may also correspond with us by email, post, phone or face-to-face and provide identity data in that manner;
- Technical data, which includes your internet protocol (IP) address, your browser type and version, your time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access the Website. This data is collected through analytics providers, and by using cookies. More information about our use of cookies is available at: <http://www.caiml.co.uk/cookie-policy/>;
- Usage data, which includes information about how you use our Website, products and services;
- Marketing and communications data, which includes information used to communicate with you regarding products and services, where you have provided consent for us to do so. An unsubscribe link is attached to every marketing email we send which will allow you to manage your consent preferences at any time.

We may also collect, process and share aggregated data such as statistical or demographic data for any purpose. Aggregated data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may process aggregated data to calculate the percentage of users accessing a specific website feature. If we combine or connect aggregated data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

We do not collect any special categories of personal data about you through your use of the Website, nor do we collect any information about criminal convictions and offences.

4. HOW WE USE YOUR PERSONAL DATA

We will only process your personal data when the law allows us to. Most commonly, we will process 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 an entity represented by you. For example, we may process identity data for this purpose.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests. For example, we may process your identity, technical and usage data to deliver relevant content to you via the Website. We may process your technical and usage data to administer

and protect our business and this Website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data).

- Where we need to comply with our legal or regulatory obligations as a UK-based bank.
- To communicate with you where you have provided consent for us to do so; for example, marketing and other such communications.

The law requires CAIM to have a legal basis for processing personal data. We rely on one of the following legal bases to process your personal data:

- Where you have given us your consent;
- Where it is necessary for compliance with a legal obligation;
- Contractual necessity; and
- Where it is necessary for the purposes of our legitimate interests:
 - to help us better understand our customers and improve our customer engagement including by carrying out marketing analytics and profiling, e.g. by making certain predictions and assumptions about your interests; and
 - to analyse and assess competition in the market for our products services, e.g., by carrying out market research;

but only if these are not overridden by your interests, rights or freedoms.

We seek to ensure that our information collection and processing is always proportionate. We will notify you of any changes to information we collect or to the purposes for which we collect and process it.

5. COOKIES

In general, cookies are used to collect basic web page metrics and retain user preferences. Our metrics may include information such as visit duration, page popularity and website performance. 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 this Website may become inaccessible or not function properly. For more information about the cookies we use, please see <http://www.caiml.co.uk/cookie-policy/>.

6. CHANGE OF PURPOSE

We will only process your personal data for the purposes for which we collected it, unless we reasonably consider that we need to process it for another reason and that reason is compatible with the original purpose. If we need to process your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

7. PROVIDING INFORMATION TO THIRD PARTIES

We ensure that any third-party service providers we use are required to take appropriate security measures to protect your personal data in line with our policies and we only permit them to process your personal data for specified purposes and in accordance with our instructions. We will not share any of the information you provide to us with any third parties for marketing purposes.

We may share your personal data where lawful to do so, including:

- Other parties that you have instructed us to share your personal information with;
- Where we have a public or legal duty to do so, for example to detect or prevent financial crime.

8. TRANSFER OF YOUR PERSONAL DATA OUT OF THE EEA

We do not currently envisage that we will need to transfer any of your personal data to which this notice applies to countries or entities located outside the UK or EEA. If in the future we decide to transfer personal data covered by this notice to external third parties based outside the EEA, we will ensure that adequate safeguards are in place, as required under the GDPR.

9. DATA RETENTION

We will only retain your personal data for a period of up to 7 years or as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

10. DATA SECURITY

We have put in place security measures to prevent your personal information from being accidentally lost, processed or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need-to-know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected data breach where we are legally required to do so.

11. PROCESSING IN LINE WITH YOUR RIGHTS UNDER THE GDPR

Under certain circumstances, by law you have the right to:

- **Request access** to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it;
- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected;
- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information 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 information where you have exercised your right to object to processing (see below);
- **Object to processing** of your personal information 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;
- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it;
- **Request the transfer** of your personal information to another party;
- **Withdraw consent** in the limited circumstances you have provided your consent to the collection and processing of your personal data;
- **Object to automated processing** if are receiving targeted marketing and you wish to stop receiving irrelevant emails;
- **Complain** to the Information Commissioner's office which is the supervisory authority in the UK.

Any individuals wishing to exercise any of the rights listed above, should first contact our Data Protection Officer using the contact details below.

12. DATA PRIVACY MANAGEMENT

We have appointed an internal team to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please contact us at: email:

dataprotection@crowncrownagentsbank.com; telephone: +44 (0)20 3903 3000.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact us in writing at:

dataprotection@crowncrownagentsbank.com, or
Data Protection
Crown Agents Investment Management Limited
Quadrant House
The Quadrant
Sutton
SM2 5AS.

13. BREACHES OF DATA PROTECTION PRINCIPLES

We hope that we can resolve any query or concern you raise about our processing of your information. If not, contact the Information Commissioner at <https://ico.org.uk/concerns/> or telephone: 0303 123 1113 for further information about your rights and how to make a formal complaint.

14. CHANGES TO THIS PRIVACY NOTICE

This privacy notice was last updated on 21 November 2022. We reserve the right to vary this notice from time to time by uploading a new version to the Website.