

Privacy Policy

This website is provided by Brooks Macdonald Group plc (“Us”, “We”, “Brooks Macdonald”) which is the holding company of:

- * Brooks Macdonald Asset Management Limited;
- * Brooks Macdonald Financial Consulting Limited;
- * Brooks Macdonald Funds Limited;
- * Braemar Group Limited;
- * Brooks Macdonald Asset Management (International) Limited; and
- * Brooks Macdonald Retirement Services (International) Limited.

Brooks Macdonald Asset Management Limited, Brooks Macdonald Financial Consulting Limited and Brooks Macdonald Funds Limited are authorised and regulated by the Financial Conduct Authority and are registered with the Information Commissioner’s Office. Braemar Group Limited is also registered with the Information Commissioner’s Office.

Brooks Macdonald Asset Management (International) Limited is regulated by the Guernsey Financial Services Commission with its Jersey Branch regulated by the Jersey Financial Services Commission and is a member of and complies with the rules and regulations of the London Stock Exchange. Brooks Macdonald Retirement Services (International) Limited regulated by the Jersey Financial Services Commission, with its Guernsey branch regulated by the Guernsey Financial Services Commission are also registered with the Data Protection Commissioners Office in both Jersey and Guernsey.

This privacy policy explains how we use any personal information we collect about you when you use this website.

Purpose of Privacy Policy

We have developed this policy because we want you to feel confident about the privacy and the security of your personal information. Brooks Macdonald Group companies are registered under the data protection laws in the United Kingdom, Jersey and Guernsey and we reference the following legislation:

Data Protection Act 1998;

Data Protection (Jersey) Law 2005; and

The Data Protection (Bailiwick of Guernsey) Law, 2001

Hereinafter known as the “Acts”.

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Registered in England No 4402058. Brooks Macdonald Group plc. Company Registered Office: 111 Park Street Mayfair London W1K 7JL

When we refer to “personal information” in this privacy policy, we mean information, which identifies you as an individual, or is capable of doing so. We may hold and use data about you in your capacity as a consumer, business customer, individual, as a shareholder, or any other capacity in which you may visit our websites. Please read this privacy policy carefully. By clicking ‘accept’ and continuing to visit any of our websites or use of any of our services, you indicate your agreement to our use of your personal information as set out in this privacy policy.

Topics:

- * what information do we collect about you?
- * how will we use your information?
- * marketing and communication
- * access to your information and correction
- * how we protect your personal information
- * termination of your online access and retention of your personal information
- * will your personal information be transferred outside Europe?
- * cookies
- * other websites
- * changes to our Privacy Policy
- * how to contact us

What information do we collect about you?

We collect information about you when you register with us, become our client, apply to use any of our services or contact us in person, by telephone, by e-mail or by post. We also collect information from you when you voluntarily complete customer surveys, provide feedback or complete a contact form on our website. When you access or use our websites, website usage information is collected using cookies.

How will we use your information?

We collect information about you for the following reasons:

- * to process your application to use our services;
- * to verify your identity to help prevent money laundering and financial crime;
- * to help protect your information and prevent unauthorised access to your information; and
- * to help to improve the services we provide to you.

We may use, collect and share your information (including but not limited to, information from cookies, log files, location data, and usage data) with businesses that are legally part of the same group of companies within Brooks Macdonald, or that become part of that group ("Affiliates") in order to facilitate the objectives listed above. However, your personal information will not be shared between different companies within our group of companies unless you have consented to this or unless this is necessary for the provision of services to you. Information will be shared with third parties where this is necessary to enable us to provide our services to you or to allow us to comply with our legal or regulatory obligations. Third parties with whom we will share your information and the reasons for this are as follows:

Brokers and other intermediaries

We share information with brokers and other intermediaries, consultants and service providers in order to carry out the purchase and sale of investments on your behalf and to ensure we can provide and maintain the provision of services to you.

The Financial Conduct Authority and other regulators

The Financial Conduct Authority, other regulatory bodies and some government agencies have a legal right to access the information we hold. We have a legal obligation to disclose information we hold to such bodies.

Our professional advisers

Our appointed auditors, accountants, lawyers and other professional advisers sometimes require access to the information we hold in order to advise us.

Pension trustees, bond providers and other such service providers

You may ask us to advise you in relation to pensions, offshore bonds, onshore bonds, trusts and other such products or you may ask us to set up such products on your behalf or manage investments within such products. In such cases, we will share information with the providers of such products in order to provide our services to you. We may also be required to share information with auditors appointed by the providers of such products.

Credit reference agencies, fraud prevention agencies and related service providers

We may have to verify your identity to help prevent money laundering and financial crime. If you consent, we may do this when you first approach us to provide our services to you, as part of our account opening process and annually thereafter. A third party provides us with an electronic identity verification system which we may use to verify your identity. This requires us to send your information electronically to a third party who will then pass information on to credit reference and fraud prevention agencies.

We will not share your information with third parties except as set out in this Privacy Policy. We will not lend or sell your information to third parties for any reason.

Marketing and communication

We would like to send you information about products and services of ours and other companies in our group which may be of interest to you. We would also like to send you news and information about the financial markets and financial services. We will seek your consent before sending you any such marketing or communications. When you register with us or apply to use our services you may specify your marketing and communication preferences or indicate that you do not wish to receive news or information. If you have consented to receive marketing communications you may change your preferences or opt out at a later date.

You have a right at any time to stop us from contacting you for marketing purposes. If you no longer wish to be contacted for marketing purposes you may contact us using the contact details below.

We may from time to time offer joint or co-branded products and services.

Access to your information and correction

You have the right to request a copy of the information that we hold about you. If you would like a copy of some or all of the personal information we hold about you please contact us using the contact details below. We want to make sure that your personal information is accurate and up-to-date. You may ask us to correct or remove information you think is inaccurate. In some circumstances we may provide online access to information and not hard copies. We may charge a nominal fee in order to cover some of our administration costs in responding to your request. We are permitted to do this under the relevant Acts which govern our businesses'.

How we protect your personal information

We take appropriate security measures (including physical, electronic and procedural measures) to help safeguard your personal information from unauthorised access and disclosure. For example, only authorised employees are permitted to access personal information, and they may do so only for permitted business functions. In addition, we use firewalls to help prevent unauthorised persons from gaining access to your personal information.

You are responsible for maintaining the confidentiality of your User ID and password which relate to your access to certain pages of this website or any account you set up with us. You agree to accept responsibility for all activities which occur in relation to the same. You should not permit other people to use your User ID or password. Please contact us promptly if you believe your User ID or password may have been compromised. We will not be responsible to you if there is unauthorised access to your login details or unauthorised activity on this website as a result of someone else using your login details, unless we caused this to happen because of negligence.

Despite our efforts regarding security it is important to bear in mind that the internet is not a secure means of communication. Personal information communicated through the internet may be intercepted by other people. We cannot guarantee the security of personal information sent to us through this website. You accept that you use this website at your own risk.

Termination of your online access and retention of your personal information

In accordance with the Acts we will ensure your personal information is not kept longer than necessary for the relevant purpose(s) [by us or by any third parties that process it for or on our behalf]. Where personal information which we hold is known to be unreliable, irrelevant or excessive, we will delete it securely, as soon as possible.

We reserve the right to terminate your access to the specific areas where you have been granted access through use of a User ID and password without prior notice. If we terminate your access or if you notify us in writing that you wish to terminate your own access, we will keep your personal information thereafter only for as long as is necessary in case of any legal challenges or other problems. After that period your personal information will be suppressed in or deleted from our database(s).

Will your personal information be transferred outside The EU

We may share your personal information with our service providers and this may involve transferring it to countries outside The EU whose data protection laws may not be as extensive as those which apply to us. In some circumstances it may be necessary for us to transfer data to our offices in Jersey and Guernsey and in such circumstances where we do transfer your personal information to a country outside The EU, we will ensure that we do this in accordance with the Acts (for example, by putting in place an appropriate data transfer agreement). We will do this with a view to ensuring that the level of protection which applies to your personal information processed in these countries is similar to that which applies within The EU.

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 owners of the site.

For further information about cookies visit www.aboutcookies.org or www.allaboutcookies.org.

We have to obtain your consent before placing cookies on your computer. We will ask you to consent to our use of cookies and to the terms of use of our website when you try to access our website. Clicking 'Accept' when prompted will indicate your consent. If you do not consent, you may click 'Decline' when prompted.

You can set your browser settings not to accept cookies and the above websites tell you how to remove cookies from your browser. However, if you do not consent to cookies being placed on your computer or you set your browser not to accept cookies, some of our website features may not function or you may not be able to access parts of our website.

The cookies we use and our reasons for using them are set out below:

Type of cookie

Google Analytics

Why we need to use it

These cookies are used to collect information about how our visitors use our site. We use the information to compile reports and to help us improve the site. The cookies collect information in an anonymous form, including the number of visitors to the site, where visitors have come to the site from and the pages they visited.

Disclaimer cookie

This cookie relates to the pop-up disclaimer on our website. It enables the website to remember your user type so that our disclaimer does not pop up every time you visit our website.

Content cookie

This cookie enables us to sort content within the website to help improve your experience of our website.

Java Script cookie

This cookie tells our website whether or not you have Java Script enabled. Java Script is a scripting language that improves the functionality of our website.

Session cookie

This cookie stores user session information. This is used to improve your experience of our website. This cookie does not collect or hold any personal information

Funds website only

Log-in cookie

This improves the experience of our website for clients who log in to view information about their holdings in our fund of funds products.

Braemar Estates website only

Propman Client Web Portal cookie

This is a settings-led consent to store your Login User ID so the website can remember you the next time you visit the site.

Asset Management website only

Digital Look – encrypted details

This cookie helps our website identify your user ID and e-mail details so that you can access encrypted data. It is required by a component called 'Digital Look Research'.

Initialisation cookie

We use a cookie to enable decryption of certain data on our website when you log in. This cookie does not collect or hold personal information.

Digital Look – Figaro cookie

This cookie enables our website to provide a link from one component of our website, Digital Look, to another, Figaro. This cookie does not collect or hold personal information.

Click here for an overview of privacy at Google. To opt out of being tracked by Google Analytics across all websites visit <http://tools.google.com/dlpage/gaoptout>.

YouTube cookies

On www.brooksmacdonald.com we have embedded videos from Middlesex County Cricket Club's official YouTube channel using YouTube's privacy-enhanced mode. This mode may set cookies on your computer once you click on the YouTube video player, but YouTube will not store personally-identifiable cookie information for playbacks of embedded videos using the privacy-enhanced mode. To find out more please visit YouTube's [embedding videos information page](#).

Other websites

Brooks Macdonald will sometimes embed photos and video content from other websites. Pages with this embedded content may present cookies from their websites. Brooks Macdonald does not control the dissemination of these cookies and we will not block cookies from those websites. You should check the relevant third party website for more information and should read the privacy policies on those sites.

Changes to our Privacy Policy

We keep our Privacy Policy under regular review and we will place any updates on this webpage. This Privacy Policy was last updated on 30 January 2014.

How to contact us

Please contact us if you have any questions about our Privacy Policy or information we hold about you:

E-mail: compliance3@brooksmacdonald.com

Post: Group Risk and Compliance, Brooks Macdonald Group plc, 111 Park Street, Mayfair, London W1K 7JL.