

Privacy Policy

Date: September 2017

1 OUR PRIVACY POLICY

Henderson Rowe is committed to safeguarding the privacy of our prospective clients, client and visitors to our website. In line with the Data Protection Act (DPA) 1998 and General Data Protection Regulation (GDPR) our clients, prospective clients and website users are given specific rights in relation to their personal information.

We are registered as a data controller with the UK Information Commissioner's Office and our data protection registration number is Z7087362.

We may update this Policy from time to time on our website and recommend that you check this page occasionally to ensure that you are aware of any changes.

If you wish to contact us about your personal information or this Privacy Policy, please see our contact details on the 'Get in touch' section of our website. You may also opt out of receiving our marketing communications at any time by emailing us at hello@hendersonrowe.com.

2 COLLECTING AND USING YOUR PERSONAL INFORMATION

We may collect, store and use the following:

- Your personal data, as relevant to assessing the suitability of our services for you, including on occasion your Sensitive Personal Data (SPD) such as relating to your physical or mental health, if you volunteer it during the completion of a form or discussion with one of our representatives. If you volunteer Sensitive Personal Data to us, we will ask you to complete an SPD Consent Form in order for you to provide your explicit consent to our processing of that data for the purposes set out in the form. For example, we may use your sensitive personal data to better manage your needs such as if you tell us you have a visual impairment we may provide documentation to you in larger print.
- Information about your computer and data in relation to your visits to our website. Examples include your IP address, geographical location, browser type and version, how you accessed the website (e.g. through a search engine), length of visit, date of visit, page views and the order of pages you accessed during your visit.
- Any other personal information that you choose to share with us.

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The personal information we collect from you or you submit to us, through our website or through interaction with our representatives (such as when you are contacted by us concerning your consent to marketing, or you make an enquiry concerning our services) will be used for the purposes specified in this policy or on the relevant page of our website.

The following are examples of how we may use your personal information:

- To understand your journey on our website
- To help us identify you and any accounts, products or services you may hold with us
- Administration purposes
- Research, statistical analysis and behavioural advertising
- Marketing – please see the **marketing and opting out** section below
- Identity verification, financial background or security checks –please see the **identification and verification** section below
- Fraud prevention and detection (including money laundering checks)
- To deal with enquiries and complaints made by you through contact with us
- To notify you of any changes or improvements to our website, our products or our services that may affect you

3 MONITORING

We may monitor and record communications with you (such as telephone conversations and emails) for the purpose of quality assurance, training, fraud protection and compliance purposes.

4 MARKETING AND OPTING OUT

We may contact you by telephone to obtain your consent to market our services to you. We have three levels of marketing consent from which you can choose:

1. Basic Contact - We will contact you by telephone, no more than twice per year, to enquire whether you would be interested in our services. If agreed by you during such a call, we will follow up with an email providing information on our services and investment approach. This contact will continue until you opt out.
2. Market View – We will contact you as per the Basic Service above, plus by email once every three months with our Quarterly Market View, which may include information on any new products/services that we have or will be launching. Your consent to this contact will be reviewed with you every two years, unless you opt out in the meantime.

3. Products & Services – We will contact you as per the Basic Service and Market View above, plus we will email you ad-hoc information, no more than once per month, on any new products we have or will be launching. Your consent to this contact will be reviewed with you every two years, unless you opt out in the meantime.

We will not (without your consent) supply your personal information to any third party for the purpose of their own or any other third party's direct marketing.

If at any time you decide that you would rather not be contacted as per the above, or wish to reduce your consent any direct marketing communications from us, you may opt out of receiving these at any time. Please see the Your Rights and Contact Us sections below for further information.

5 DISCLOSURE OF YOUR PERSONAL DATA

We may disclose, only where necessary in the execution of our service, the personal information that we have collected from you to:

- Our outsourced operations, clearing and settlement provider.
- Our other suppliers and service providers.
- Identification and verification agencies for the purposes of anti-money laundering and Fighting Financial Crime.
- Law enforcement agencies and regulators in connection with any investigation to help prevent unlawful activity and/or regulatory breaches.

6 INFORMATION ABOUT OTHER INDIVIDUALS

If you give us information on behalf of someone else, you confirm that the other person has appointed you to act on their behalf and has agreed that you can:

- Give consent on their behalf to the processing of their personal data.
- Receive on their behalf any data protection notices.
- Give consent to the processing of their personal information abroad.
- Give consent to the processing of their sensitive personal data (such as their physical or mental health, racial or ethnic origin or religious or political beliefs).

7 INTERNATIONAL DATA TRANSFERS

Information that we collect from you including via our website (such as when discussing our services with you over the telephone, make an enquiry via our website or consent to receive marketing) may be stored, processed and transferred outside of the UK, to enable us to provide you with services and/or to administer our relationship with you.

If we need to transfer your personal information outside of the European Economic Area we will either request your consent to do so, or that transfer will be subject to a European Commission approved contract that will safeguard your personal information.

8 RETAINING PERSONAL INFORMATION

Personal information that we process for any purpose will not be kept for longer than is necessary in the execution of our services and in line with your consent to marketing. When you consent to receiving our Basic Contact, for example, you will keep receiving telephone calls no more than twice yearly indefinitely until you opt out.

Once you become a client with Henderson Rowe we will retain and process your personal information until your relationship with us has ended, and in accordance with minimum record retention periods required by our regulator, the Financial Conduct Authority.

Personal information that you publish on our website, (if you comment on any blog or news feed that we may choose to publish, for example) will remain on our website. The comments you publish may be available via the internet around the world and we cannot prevent the use or misuse of this information by others.

9 SECURITY OF YOUR PERSONAL INFORMATION

We will use technical and organisational measures to safeguard your personal information and take reasonable precautions to prevent the loss, misuse or alteration of your personal information.

For example:

- We will store all the personal information that you provide in a secure private cloud environment, which is password and firewall protected.
- Access to your account via the online services provided via our suppliers is controlled by password and username credentials that are unique to you.

Henderson Rowe has in place a robust Data Protection Policy, which can be found on our website, setting out our approach to protecting the personal data of our clients. We cannot, however, guarantee the security or integrity of all data we hold, as cybersecurity breach risk cannot be entirely mitigated and the transmission of information over the internet is inherently insecure.

10 YOUR RIGHTS

You can ask us to provide you with any personal information we hold about you (this is called a Data Subject Access Request, or DSAR). If you wish to exercise this right, you should:

- Put your request in writing to us, or via email.

- Include proof of your identity and address (for example, by enclosing a copy of your driving licence or passport (certified by a solicitor or a bank) and a recent utility or credit card bill dated within the last three months and showing your current address).
- Specify the personal information you want access to, including any account or reference numbers where applicable.

Please note that in responding to a DSAR we may withhold personal information that you request to the extent permitted by law. Subject to any withholding of data, we will respond to your request within 30 days, providing the requested information in a commonly used electronic format, such as an email or transferable media device (USB stick).

You have the right to require us to correct any inaccuracies in the personal information we hold about you free of charge. If you wish to exercise this right, you should:

- Put your request in writing, or by email.
- Provide us with enough information to identify you (for example, account number, user name, registration details), and;
- Specify the information which is incorrect and what it should be replaced with.

You also have the right to ask us to stop processing your personal data for marketing purposes. If you wish to exercise this right, you should:

- Contact us by telephone, in writing or by email.
- Provide us with enough information to identify you (for example, account number, user name, registration details), and
- If your objection is not to marketing in general, but to direct marketing by a particular channel, such as by email or telephone, please specify the channel you are objecting to as we may be able to amend our approach accordingly.

11 INTERNET USAGE AND COOKIES

You can access full information concerning use of our website can be found within our Website Disclaimer at www.hendersonrowe.com.

A cookie consists of information sent by a web server to a web browser, and stored by the browser. The information is then sent back to the server each time the browser requests a page from the server. This enables the web server to identify and track the web browser.

We may use both “session” cookies and “persistent” cookies on the website. We may use the session cookies to keep track of you whilst you navigate the website and the persistent cookies to enable our website to recognise you when you visit. Session cookies will be deleted from your computer when you close your browser. Persistent cookies will remain stored on your computer until deleted, or until they reach a specified expiry date.

Most browsers allow you to reject all cookies, whilst some browsers allow you to reject just third party cookies. For example, in Internet Explorer you can refuse all cookies by clicking “Tools”, “Internet Options”, “Privacy”, and selecting “Block all cookies” using the sliding selector. Blocking all cookies will, however, have a negative impact upon the usability of many websites.

12 THIRD PARTY WEBSITES

Our website includes hyperlinks to, and details of, third party websites over which we have no control. We are not responsible for the privacy policies and practices of third parties.