

## Privacy Policy

### Who we are

The data controller with control of your personal information is Regents Park Securities Limited of 77 New Cavendish Street, London, W1W 6XB.

In this Policy, 'RPS', 'we', 'us', 'Company' and 'our' means Regents Park Securities Limited. This Policy is issued in accordance with the General Data Protection Regulation EU 2016/679 (GDPR).

### What this Privacy Policy covers

This Privacy Policy gives you information about how RPS treats personal information we receive about you from the following sources:

1. account applications, enquiries and secure messages submitted through our website (<http://www.rpsec.co.uk>); and
2. telephone calls or email.

Please read the following sections carefully to understand how your personal information will be used and handled by RPS. Your use of our website is also subject to our website's Terms and Conditions. RPS collects and uses your data in accordance with the General Data Protection Regulation.

### To whom does this Policy apply?

This Policy applies to you if you are an individual client, or their authorised person. It applies to you if you are a person associated with a corporate client (such as a director, beneficial owner or authorised signatory).

This Policy also applies to prospective clients and persons who have asked to receive our promotional or other material.

### What personal information is collected about you and why?

We collect personal information via our account application process and throughout our relationship with you.

We collect and use personal information on the basis that it enables us to perform our contract with you, or because it is in our legitimate interests to do so, or because we are required to do so by regulation, for example to provide a service to our clients and to keep records of transactions. The provision of information for marketing purposes is entirely voluntary and requires your explicit consent.

We may record and monitor phone calls made to or by us in order to comply with regulatory obligations. All our decisions are checked by persons, including those relating to our Know

Your Customer/Anti-Money Laundering checks or to ensure that RPS is providing a suitable and appropriate service to you. We do not use any automated decision-making in providing services to you.

We also collect personal information you provide when filling in one of our online enquiry forms and we will use this to keep you updated about RPS' activities and services.

During the course of our relationship, you may disclose details about your health including your mental health which may be relevant to our provision of services to you. For certain information, we may require your consent to process it. Where we ask for your consent and you do not give it, this may limit our ability to provide products and services to you.

### How is your personal information collected?

We process personal information that you provide to us directly and personal information we obtain about you from our communications and dealings with you. We may also collect some personal information from third parties, including:

- an existing client, such as an individual or institutional client or prospective client you are associated with; or
- fraud prevention agencies, professional background checking entities, international sanctions lists or any public databases or data sources.

### How long do we keep your personal information?

If you are a client, we are processing your personal information in connection with performing our contract with you. If you are an authorised person of a client, we are processing your personal information in connection with performing our contract with our client. We keep your personal information for as long as is required in order to fulfil our contractual, regulatory or legal obligations. We may also retain personal information to establish, exercise or defend any legal claims and in order to protect and enforce RPS' rights for as long as is reasonably necessary and any personal information may be disclosed to the Courts, regulators and/or other relevant authorities.

If you are a prospective client, we will keep your information for a year after we last heard from you. If you have contacted us to receive our marketing or other material, you can unsubscribe from these at any time. If you ask us to remove you from our marketing list, we may keep your personal details on an 'opted-out' list in order to ensure that we do not market to you again.

If you are or were a client or an authorised person of a client, we will keep most of your information for five years after the closure of your account unless there is a regulatory or legal requirement to keep it for longer. We keep recordings of telephone conversations with you for up to six years after they took place unless there is a legal or regulatory requirement to keep them for longer.

### Who do we share your personal information with?

We may share your personal information with:

- our counterparties (including banks, custodians, brokers, settlement agents, stock exchanges);
- providers of investment products or services, including issuers of securities or other such products or services. We may also be required to share information with the auditors appointed by the providers of such products or services;
- our IT providers and service providers in order to provide and maintain the provision of our services, including emergency support;
- our appointed auditors, accountants, lawyers, and other professional advisers, to the extent that they require access to the information to provide advice or perform their services to us;
- fraud prevention agencies, screening agencies and other organisations to allow us to undertake relevant checks;
- potential new IT and service providers, including but not limited to potential new screening agencies, for the purposes of assessing the provider's offering;
- the Financial Conduct Authority;
- the Information Commissioner's Office in the UK;
- if required to do so to meet applicable law, the order of a Court or market rules and codes of practice applicable to the circumstances at the time;
- relevant authorities to investigate or prevent fraud or activities believed to be illegal or otherwise in breach of applicable law;
- if tax regulations require us to collect information about tax residency, then in certain circumstances (including if we do not receive a valid self-certification from you), we may be obliged to share information about your account with the relevant tax, payments and customs authority, who may pass this on to tax authorities in other jurisdictions;
- in the event that we sell or buy any business or assets, in which case we will disclose your personal information to the prospective seller or buyer of such business or assets;
- if some or all of RPS' assets are acquired by a third party, in which case personal information held by us about our clients may be one of the transferred assets.

We will not sell your personal information to third parties and we will only share your data with third parties where this is permitted by law.

#### [Where do we transfer your personal information?](#)

Your personal information may need to be shared with our service providers, which may involve transferring it to countries outside the European Economic Area (EEA). Certain jurisdictions benefit from a European Commission adequacy decision. Where no such adequacy decision exists, we will ensure that we do this in accordance with current data protection legislation. Such transfers are permitted where it is required for the performance of our contract with you or where we have your consent to transfer it. Where possible, we will use model clauses which have been approved by the European Commission or other available safeguards.

## Marketing and communications

If you agree, we may send you information about new products and services which may be of interest to you and which do not relate to the products or services which you currently receive from us.

If you have consented to receive marketing, you may still opt out at a later date. We may use your contact details to send you invitations to events and investment commentaries, updates or other communications which are relevant to the products or services which you receive from RPS and which are considered to be part of the service which we offer you. We may also invite you to participate in satisfaction surveys so that we can ensure that our services meet your expectations.

You have the right at any time to stop us from contacting you for marketing purposes. If you no longer wish to be contacted for marketing purposes please email us at or write to us using the details at the end of this Policy.

## Your rights

You have a number of legal rights in relation to the personal information that we hold about you. These rights include:

- Request access to your personal information ("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.
- Withdraw your consent to our processing of your personal data at any time. Please note, however, that we may still be entitled to process your personal data if we have another legitimate reason (other than consent) for doing so.
- 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. You also have the right to object where we are processing your personal information for direct marketing purposes.
- 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.
- Lodge a complaint with the data protection regulator (details of which are provided below) if you think that any of your rights have been infringed by us.

If you wish to exercise these rights, please contact RPS in writing. Our contact details are set out at the end of the Privacy Policy. You can find out more information about your rights by

contacting the Information Commissioner's Office, or by searching their website at [www.ico.org.uk](http://www.ico.org.uk).

Please note that the application of these rights vary according to the legal basis used to process your data. In certain circumstances we are required to retain copies of information we hold about you by other regulations. In this instance we will not be able to erase or modify the data.

We will endeavour to keep your personal information accurate, however, if at any time after giving us this information it becomes out of date, then we ask you to notify us directly and we shall remove or amend the information within a reasonable time frame and in accordance with legislative requirements.

### Access to Information

Under data protection law you can exercise your right of access by making a written request to receive copies of the information we hold about you. You must send us proof of your identity, or proof of authority if you are making the request on behalf of someone else, before we can supply the information to you. Please note that:

- (a) we will be allowed to charge you for our reasonable administrative costs in collating and providing you with details of the information we hold about you, if your request is clearly unfounded or excessive; and
- (b) in certain circumstances, you will be entitled to receive the information in a structured, commonly used and machine readable form.

### How do we protect your personal information?

We have implemented appropriate measures to keep your personal information secure and confidential.

Unfortunately, the transmission of information via the internet, which includes email, is not completely secure. Although RPS will do its best to protect your personal information, we cannot accept any responsibility for unauthorised access by a third party or for the loss, theft or modification of data while it is being sent to us by email. For security purposes we may monitor emails received or issued by us.

### IP Addresses and Cookies

RPS may collect information about your computer, including where available your IP address, operating system and browser type, for system administration and management. This is statistical data about users' browsing actions and patterns, and does not identify any individual. For the same reason, we may obtain information about your general internet usage by using a cookie file which is stored on the hard drive of your computer. Cookies contain information that is transferred to your computer's hard drive. Cookies help us to improve our website and deliver a better and more personalised service; to allow us to estimate audience size and usage pattern; to store information about your preferences and so allow our website to be customised according to your individual interests; to speed up your searches; and to recognise you when you return to our website. You may refuse to accept cookies by activating the setting on your browser which allows you to refuse the setting of cookies. However, if you select this setting you may be unable to access certain

parts of our website. Unless you have adjusted your browser setting so that it will refuse cookies, our website's system will issue cookies when you access our website.

#### [Other websites](#)

Our website may, from time to time, contain links to other websites. Please note that those websites will have their own Privacy Policies and RPS does not accept any responsibility or liability for such websites. Please read the respective Privacy Policy when using a link to another website.

#### [Changes to our Privacy Policy](#)

Any changes made to this Privacy Policy in the future will be posted on the website and, where appropriate, notified to you by email. It is recommended that you visit this page from time to time to review any changes. This Privacy Policy was last updated in December 2018.

#### [How to contact us](#)

For questions, comments and requests about our Privacy Policy or the personal information we hold about you, please contact us at the address below:

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London  
W1W 6XB  
Phone: +44 203 515 5600