

eFAIR PROCESSING NOTICE SJPI

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### 3. St James's Place International Products

Please click below for more information about the products we offer.

1	<p><b><u>St. James's Place International Products</u></b></p> <p>St. James's Place International plc ("SJPI") is an Irish registered life insurance company authorised by the Central Bank of Ireland. SJPI manufactures gross roll-up investment products including the International Investment Bond and Fund Administration Bond. SJPI is contracted with the St. James's Place ("SJP") Partnership to distribute its products through SJP controlled distributor companies currently established in the UK, Singapore and China.</p> <p>Depending on the product you take out with us, your data controller will either be SJPI or another entity within the St. James's Place group of companies. If you are unsure about who the data controller of your personal information is, you can contact us at any time using the contact details in section 10 below.</p> <p>For the purposes of this section and section 4, "<b>we</b>" and "<b>our</b>" shall refer to the relevant data controller as above according to the product that you have and "<b>product</b>" shall refer to the relevant product you hold.</p>
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### 4. Our processing of your personal information ►

1	<p>We will collect and use different personal information about you for different reasons, depending on our relationship with you and the product held.</p> <p>Sometimes we will receive "special categories of personal information" (which is information relating to your health, genetic or biometric data, sex life, sexual orientation, racial or ethnic origin, political opinions, religious or philosophical beliefs, and trade union membership).</p> <p>We may also collect criminal convictions data for fraud prevention purposes.</p> <p>We also use details of any unspent criminal convictions provided for fraud prevention purposes. However, we will only do so where we have your explicit consent or where such processing is necessary for us to enter into and perform our contract with you.</p> <p>Where you provide personal information to us about other individuals (for example, members of your family or other dependents) we will also be data controller of their personal information and we are responsible for protecting their personal information and using it appropriately. This notice will therefore apply to those individuals and you should refer them to this notice.</p> <p>In order to make this notice as user friendly as possible, we have split it into different sections. Please click on the section below that best describes your relationship with us and the service you receive from us.</p>
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1	<b>Where you are an existing client and have purchased a St James's Place International product from us</b>
2	<p>This section will apply if you are an existing client of ours and you have purchased a St James's Place International product from us (e.g. International Investment Bond). ,</p> <p><b>What personal information may we collect? ►</b></p>
3	<ul style="list-style-type: none"> <li>• General information such as your name, address, phone numbers and email addresses, date of birth, gender and marital status.</li> <li>• Identification information including passport, driving licence, government issued ID verification and address verification documents such as local property tax letters or bank statement and evidence of social welfare payments.</li> <li>• Employment information such as job title, employment history and professional accreditations.</li> <li>• Financial information relevant to the products we provide, including: <ul style="list-style-type: none"> <li>○ Bank details</li> <li>○ Financial reviews (fact finds)</li> <li>○ Information relating to your personal finances such as your financial liabilities and assets, income and outgoings.</li> </ul> </li> <li>• Information obtained from carrying out identification checks and checking sanction lists and politically exposed persons (PEP) screening, including bankruptcy orders or where you have been flagged as a PEP.</li> <li>• Information about your family including information about your dependants.</li> <li>• Information obtained during telephone recordings where recorded</li> <li>• Information obtained during the course of emails, queries and complaints.</li> <li>• Your marketing preferences and details of your customer experience with us.</li> <li>• Information such as IP address and browsing history obtained through our use of cookies. You can find more information about this in our cookies policy in section 11 below.</li> <li>• Personal data of those individuals who have rights under or in connection with our products such as lives assured, dependents, nominated beneficiaries, trustees, authorised representatives, independent financial advisors, and lawyers.</li> <li>• Information on Individuals/Controlling Persons of an entity under FATCA/CRS.</li> </ul>
2	<b>What special categories and criminal conviction or offences data will we collect? ►</b>
3	<ul style="list-style-type: none"> <li>• As part of our regulatory requirements, details about any relevant criminal convictions / offences and any related information which have been obtained from our sanctions checks and PEP screening. This will include information relating to any offences or alleged offences you have committed or any court sentences which you are subject to. We may collect details about your health which are relevant to your application (e.g. we may ask you about any medical conditions that affect you to establish whether you are deemed to be a vulnerable client). In limited circumstances, we may also collect information which relates to your trade union membership (for example when gathering your employment details), genetic or biometric data or data concerning your sex life or sexual orientation where you instruct us on joint products.</li> </ul>

2	<b>How will we collect your personal information? ►</b>
	<p>We will collect information directly from you when:</p> <ul style="list-style-type: none"> <li>• you apply to purchase, vary or renew a St James's Place International product; and</li> <li>• you contact us by email, telephone and through other written and verbal communications.</li> </ul> <p>We will also collect your personal information from:</p> <ul style="list-style-type: none"> <li>• Your St James's Place Partner where applicable.</li> <li>• The St James's Place Wealth Management client relationship management system and hosted platforms.</li> <li>• Publicly available sources such as the electoral register, court judgments, insolvency registers, internet search engines and social media sites.</li> <li>• Other St James's Place group companies.</li> <li>• Third parties such as Experian and Capita who provide anti money laundering and fraud prevention services who we have appointed to carry out electronic ID checks, sanctions and politically exposed persons checking services.</li> </ul>
2	<p><b>What will we use your personal information for? ►</b></p> <p>There are a number of reasons we use your personal information and for each use we need to have a "lawful basis" to do so.</p> <p>We will rely on the following "lawful basis" when we process your "personal information":</p> <ul style="list-style-type: none"> <li>• We need to use your personal information to enter into or perform the client agreement that we hold with you for the product in question. For example, we need to use your personal information to provide, service and administer the products that you have purchased from us.</li> <li>• We have a legal or regulatory obligation to use such personal information. For example, our regulators require us to hold certain records of our dealings with you.</li> <li>• We have a valid business reason to use your personal information which is necessary for our everyday business operations and activities, for example to maintain business records, to review our business models, to undertake strategic and operational business analysis of the products we offer, to maintain management information, and for internal audit purposes.</li> </ul> <p>In each case we assess our need to use this personal information for these purposes against your rights to privacy to ensure we are protecting your rights.</p> <p>When we use your "special categories of personal information", we must have an additional "lawful basis" and we will rely on the following lawful basis in these circumstances:</p> <ul style="list-style-type: none"> <li>• We need to use such special categories of personal information to establish, exercise or defend legal rights, such as when we are facing legal proceedings or want to bring legal proceedings ourselves.</li> </ul>

	<ul style="list-style-type: none"> <li>You have given your explicit consent to our use of your special categories of personal information to your SJP Partner at advice stage.</li> <li>We need to use your health information for purposes relating to a policy of insurance or life assurance, or a policy of health insurance or health-related insurance.</li> </ul>
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3	<b>Purpose for processing ►</b>	<b>Lawful basis for using your personal information ►</b>	<b>Lawful basis for using your special categories of personal information or information relating to criminal convictions and offences ►</b>
	To carry out identification checks.	<ul style="list-style-type: none"> <li>It is necessary to enter into your client agreement.</li> <li>We have a valid business reason (to carry out necessary compliance checks).</li> <li>We have a legal and regulatory obligation.</li> </ul>	<ul style="list-style-type: none"> <li>We have your explicit consent.</li> <li>We need to establish, exercise or defend legal rights.</li> <li>The processing relates to health data and is necessary for an insurance purpose.</li> </ul>
	To provide services in accordance with your product agreement	<ul style="list-style-type: none"> <li>It is necessary to enter into or perform your product agreement.</li> <li>We have a valid business reason (to ensure that we fulfil our contractual obligations to clients).</li> </ul>	<ul style="list-style-type: none"> <li>You have given us your explicit consent.</li> <li>We need to use your information in order to establish, exercise or defend legal rights.</li> <li>The processing relates to health data and is necessary for an insurance purpose.</li> </ul>
	To carry out annual reviews and reviews of ongoing suitability of your current arrangements as required.	<ul style="list-style-type: none"> <li>It is necessary to enter into or perform your client agreement.</li> <li>We have a valid business reason (to ensure that we are providing appropriate services according to your circumstances).</li> </ul>	<ul style="list-style-type: none"> <li>You have given us your explicit consent.</li> <li>We need to use your information in order to establish, exercise or defend legal rights.</li> <li>The processing relates to health data and is necessary for an insurance purpose.</li> </ul>
	To prevent and investigate	<ul style="list-style-type: none"> <li>It is necessary to enter</li> </ul>	<ul style="list-style-type: none"> <li>We need to use your</li> </ul>

fraud.	<p>into or perform your client agreement.</p> <ul style="list-style-type: none"> <li>• We have a valid business reason (to prevent and detect fraud and other financial crime).</li> <li>• We have a legal and regulatory obligation.</li> </ul>	<p>information in order to establish, exercise or defend legal rights.</p> <ul style="list-style-type: none"> <li>• We have your explicit consent.</li> <li>• The processing relates to health data and is necessary for an insurance purpose.</li> </ul>
To comply with our legal or regulatory obligations.	<ul style="list-style-type: none"> <li>• We need to use your information in order to comply with our legal obligations.</li> </ul>	<ul style="list-style-type: none"> <li>• We need to use your information in order to establish, exercise or defend legal rights.</li> <li>• We have your explicit consent.</li> </ul>
To communicate with you and resolve any complaints that you might have.	<ul style="list-style-type: none"> <li>• It is necessary to enter into or perform your client agreement.</li> <li>• We have a valid business reason (to communicate with you, record and investigate complaints and ensure that complaints are handled appropriately).</li> <li>• We need to use your information in order to comply with our legal and regulatory obligations.</li> </ul>	<ul style="list-style-type: none"> <li>• We need to use your information in order to establish, exercise or defend legal rights.</li> <li>• The processing relates to health data and is necessary for an insurance purpose.</li> </ul>
To provide improved quality, training and security (for example, through recorded or monitored phone calls to our contact numbers, or carrying out customer satisfaction surveys).	<ul style="list-style-type: none"> <li>• We have a valid business reason (to develop and improve the products and services we offer).</li> </ul>	<ul style="list-style-type: none"> <li>• You have given us your explicit consent.</li> <li>• The processing relates to health data and is necessary for an insurance purpose.</li> </ul>
For business purposes and activities including maintaining business records, file keeping, strategic business planning and	<ul style="list-style-type: none"> <li>• We have a valid business reason (to run our business efficiently and effectively)</li> </ul>	<ul style="list-style-type: none"> <li>• You have given us your explicit consent.</li> <li>• We need to use your information in order to establish, exercise or</li> </ul>

	internal audit, and management information.		defend legal rights. <ul style="list-style-type: none"> <li>• The processing relates to health data and is necessary for an insurance purpose.</li> </ul>
	To apply for and claim on our own insurance.	<ul style="list-style-type: none"> <li>• We have a valid business reason (to maintain appropriate insurance)</li> </ul>	<ul style="list-style-type: none"> <li>• We need to use your information in order to establish, exercise or defend legal rights.</li> <li>• The processing relates to health data and is necessary for an insurance purpose.</li> </ul>

2	<b>Who may we share your personal information with? ►</b>
3	<p>We will not sell or transfer your personal information to anyone unless we have a valid purpose as set out above and we will only disclose it to the following parties:</p> <ul style="list-style-type: none"> <li>• Your Partner within the St James's Place Partnership so that the product you have purchased can be integrated into the wealth management service provided to you by your Partner.</li> <li>• Other St James's Place group companies.</li> <li>• Third parties (for example Capita) who carry out verification, anti money laundering and fraud prevention checks on our behalf.</li> <li>• Other third parties who have entered into contractual arrangements with us to provide services we need to carry out our everyday business activities such as client servicing (for example Capita, DST), partner support specialists, document management providers, back office system providers, secure login and email providers, storage warehouses, IT suppliers, actuaries, auditors, lawyers, fiscal representatives, outsourced business process management providers, our subcontractors and tax advisers.</li> <li>• Compliance consultants engaged by us.</li> <li>• Financial crime, fraud detection and credit agencies.</li> <li>• Our regulators including the Financial Conduct Authority, the Financial Ombudsman Service, the Financial Services Ombudsman and the Central Bank of Ireland.</li> <li>• Selected third parties in connection with any sale, transfer or disposal of our business.</li> <li>• Our insurers/reinsurers.</li> <li>• Discretionary asset managers, fund advisors, reinsurers, custodians, and banks.</li> <li>• National Competent Authorities, to include the Irish Revenue Commissioners, the Data Protection Commissioner (DPC), HM Revenue &amp; Customs (HMRC) and the UK Information Commissioner (ICO)</li> <li>• An Garda Síochana, and other crime prevention and detection agencies.</li> </ul>

1	<b>Where you are a prospective client</b>
2	<b>What personal information may we collect? ►</b>
3	<p>General information such as your name, address, phone numbers and email addresses, date of birth, gender and marital status.</p> <ul style="list-style-type: none"> <li>• Identification information including passport, driving licence, government issued ID verification and address verification documents such as local property tax letters or bank statement and evidence of social welfare payments.</li> <li>• Employment information such as job title, employment history and professional accreditations.</li> <li>• Financial information relevant to the products we provide, including: <ul style="list-style-type: none"> <li>○ Bank details</li> <li>○ Financial reviews (fact finds)</li> <li>○ Information relating to your personal finances such as your financial liabilities and assets, income and outgoings.</li> </ul> </li> </ul>



	<ul style="list-style-type: none"> <li>• Information obtained from carrying out identification checks and checking sanction lists and politically exposed persons (PEP) screening, including bankruptcy orders or where you have been flagged as a PEP.</li> <li>• Information about your family including information about your dependants.</li> <li>• Information obtained during telephone recordings.</li> <li>• Information obtained during the course of emails, queries and complaints.</li> <li>• Your marketing preferences and details of your customer experience with us.</li> <li>• Personal data of those individuals who have rights under or in connection with our products such as lives assured, dependents, nominated beneficiaries, authorised representatives, trustees, independent financial advisors, and lawyers.</li> <li>• Information on Individuals/Controlling Persons of an entity under FATCA/CRS.</li> <li>• Information such as IP address and browsing history obtained through our use of cookies. You can find more information about this in our cookies policy in section 11 below.</li> </ul>
2	<p><b>What special categories of information, criminal convictions or offences data will we collect? ►</b></p>
	<ul style="list-style-type: none"> <li>• We may collect details about your health which are relevant to your application (e.g. we may ask you about any medical conditions that affect you to establish whether you are deemed to be a vulnerable client). In limited circumstances, we may also collect information which relates to your trade union membership (for example when gathering your employment details), genetic or biometric data (or data concerning your sex life or sexual orientation where you instruct us on joint products), or relevant criminal convictions and offences information.</li> </ul>
2	<p><b>How will we collect your personal information? ►</b></p>
	<p>We will collect information directly from you when:</p> <ul style="list-style-type: none"> <li>• you enquire about a St James's Place International product or apply to purchase a St James's Place International product; and</li> <li>• you contact us by email, telephone and through other written and verbal communications.</li> </ul> <p>We will also collect your personal information from:</p> <ul style="list-style-type: none"> <li>• Your St. James's Place Partner</li> <li>• Other St James's Place group companies.</li> <li>• Third parties such as Experian and Capita who provide anti money laundering and fraud prevention services who we have appointed to carry out electronic ID checks, sanctions and politically exposed persons checking services.</li> </ul>
2	<p><b>What will we use your personal information for? ►</b></p> <p>There are a number of reasons we use your personal information and for each use we need to have a "lawful basis" to do so.</p>

We will rely on the following “lawful basis” when we process your "personal information":

- We have a valid business reason to use your personal information which is necessary for our everyday business operations and activities, for example to maintain business records, to review our business models, to undertake strategic and operational business analysis of the products we offer, to maintain management information, and for internal audit purposes.
- We need to use your personal information to enter into the product agreement with you for the product in question. For example, we need to use your personal information to set up the products that you are looking to purchase from us.
- We have a legal or regulatory obligation to use such personal information. For example, our regulators require us to hold certain records of our dealings with you.

In each case we assess our need to use this personal information for these purposes against your rights to privacy to ensure we are protecting your rights.

When we use your “special categories of personal information”, we must have an additional “lawful basis” and we will rely on the following lawful basis in these circumstances:

- We need to use such special categories of personal information to establish, exercise or defend legal rights, such as when we are facing legal proceedings or want to bring legal proceedings ourselves.
- You have given your explicit consent to our use of your special categories of personal information. In some cases we are not able to offer you a quote for one of our products unless we have your health information.
- We need to use your health information for purposes relating to a policy of insurance or life assurance, or a policy of health insurance or health-related insurance.

3	<b>Purpose for processing ►</b>	<b>Lawful basis for using your personal information ►</b>	<b>Lawful basis for using your special categories of personal information or information relating to criminal convictions and offences ►</b>
	To carry out identification checks	<ul style="list-style-type: none"> <li>• It is necessary to enter into your product agreement.</li> <li>• We have a valid business</li> </ul>	<p>We have your explicit consent.</p> <ul style="list-style-type: none"> <li>• We need to establish, exercise or defend legal</li> </ul>

	<p>reason (to carry out necessary compliance checks).</p> <ul style="list-style-type: none"> <li>We have a legal and regulatory obligation.</li> </ul>	<p>rights.</p> <ul style="list-style-type: none"> <li>The processing relates to health data and is necessary for an insurance purpose.</li> </ul>
<p>To answer any queries you may have and to provide you with a quote for the product in question.</p>	<ul style="list-style-type: none"> <li>It is necessary to enter into your product agreement.</li> <li>We have a valid business reason (to communicate with you and ensure that the product is appropriate for your requirements).</li> </ul>	<ul style="list-style-type: none"> <li>You have given us your explicit consent.</li> <li>The processing relates to health data and is necessary for an insurance purpose.</li> </ul>
<p>To arrange a product for you.</p>	<ul style="list-style-type: none"> <li>It is necessary to enter into your product agreement.</li> <li>We have a valid business reason (to ensure that the product is appropriate for your requirements).</li> </ul>	<ul style="list-style-type: none"> <li>You have given us your explicit consent.</li> <li>We need to use your information in order to establish, exercise or defend legal rights.</li> <li>The processing relates to health data and is necessary for an insurance purpose.</li> </ul>
<p>To prevent and investigate fraud.</p>	<ul style="list-style-type: none"> <li>It is necessary to enter into your product agreement.</li> <li>We have a valid business reason (to prevent and detect fraud and other financial crime).</li> </ul>	<ul style="list-style-type: none"> <li>We need to use your information in order to establish, exercise or defend legal rights.</li> </ul> <p>We have your explicit consent.</p> <ul style="list-style-type: none"> <li>The processing relates to health data and is necessary for an insurance purpose.</li> </ul>
<p>To comply with our legal or regulatory obligations.</p>	<ul style="list-style-type: none"> <li>We need to use your information in order to comply with our legal obligations.</li> </ul>	<ul style="list-style-type: none"> <li>We need to use your information in order to establish, exercise or defend legal rights.</li> <li>We have your explicit consent.</li> </ul>

		<ul style="list-style-type: none"> <li>The processing relates to health data and is necessary for an insurance purpose.</li> </ul>
To communicate with you and resolve any complaints that you might have.	<ul style="list-style-type: none"> <li>It is necessary to enter into or perform your product agreement.</li> <li>We have a valid business reason (to communicate with you, record and investigate complaints and ensure that complaints are handled appropriately).</li> <li>We need to use your information in order to comply with our legal and regulatory obligations.</li> </ul>	<ul style="list-style-type: none"> <li>You have given us your explicit consent</li> <li>We need to use your information in order to establish, exercise or defend legal rights.</li> <li>The processing relates to health data and is necessary for an insurance purpose.</li> </ul>
To provide improved quality, training and security (for example, through recorded or monitored phone calls to our contact numbers, or carrying out customer satisfaction surveys).	<ul style="list-style-type: none"> <li>We have a valid business reason (to develop and improve the products we offer).</li> </ul>	<ul style="list-style-type: none"> <li>You have given us your explicit consent.</li> <li>The processing relates to health data and is necessary for an insurance purpose.</li> </ul>
For business purposes and activities including maintaining business records, file keeping, strategic business planning and internal audit, and management information.	<ul style="list-style-type: none"> <li>We have a valid business reason (to run our business efficiently and effectively)</li> </ul>	<ul style="list-style-type: none"> <li>You have given us your explicit consent.</li> <li>We need to use your information in order to establish, exercise or defend legal rights.</li> <li>The processing relates to health data and is necessary for an insurance purpose.</li> </ul>
To apply for and claim on our own insurance.	<ul style="list-style-type: none"> <li>We have a valid business reason (to maintain appropriate insurance)</li> </ul>	<ul style="list-style-type: none"> <li>We need to use your information in order to establish, exercise or defend legal rights.</li> <li>The processing relates to health data and is</li> </ul>

			necessary for an insurance purpose.
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2	<b>Who we may share your personal information with? ►</b>
3	<p>We will not sell or transfer your personal information to anyone unless we have a valid purpose as set out above and we will only disclose it to the following parties:</p> <ul style="list-style-type: none"> <li>• Third parties who have entered into contractual arrangements with us to provide services we need to carry out our everyday business activities such as partner support specialists, document management providers, back office system providers, secure login and email providers, storage warehouses, IT suppliers, actuaries, auditors, lawyers, fiscal representatives, outsourced business process management providers, our subcontractors and tax advisers.</li> <li>• Other St James's Place group companies.</li> <li>• Third parties who provide verification, sanctions checking, anti money laundering and fraud prevention services including Experian and Capita.</li> <li>• Third parties who provide client administration services, such as Capita and DST</li> <li>• Compliance consultants engaged by us.</li> <li>• Financial crime, fraud detection and credit agencies.</li> <li>• Our regulators including the Financial Conduct Authority, the Financial Ombudsman Service, the Financial Services Ombudsman and the Central Bank of Ireland.</li> <li>• Selected third parties in connection with any sale, transfer or disposal of our business.</li> <li>• Our insurers/reinsurers.</li> <li>• Discretionary asset managers, fund advisors and reinsurers, custodians and banks.</li> <li>• National Competent authorities, to include the Irish Revenue Commissioners, the Data Protection Commissioner (DPC), HM Revenue &amp; Customs (HMRC) and the Information Commissioner (ICO).</li> <li>• An Garda Síochana and other crime prevention and detection agencies.</li> </ul>

1	<b>Where you are family member, a business associate or beneficiary of a client or prospective client, and your personal information will be used to provide our client or prospective client with a St James's Place International product or a quote ►</b>
2	This section will apply if your personal information has been provided to us as part of a quote or

	<p>an application for a St James's Place International product, for example if you are listed as a beneficiary in an application for one of our products. This section will set out how we use your information.</p> <p><b>What personal information may we collect? ►</b></p>
3	<ul style="list-style-type: none"> <li>• General information such as your name, address, phone numbers and email addresses, date of birth, gender and marital status.</li> <li>• Your relationship to our client.</li> <li>• Financial information relating to your financial liabilities, for example details of you and your partner's property portfolio to enable us to establish that the product our client is looking to purchase is appropriate.</li> <li>• Any information which is relevant to the product we provide for our client.</li> </ul>
2	<p><b>What special categories of personal information will we collect? ►</b></p>
3	<ul style="list-style-type: none"> <li>• We may collect details about your health which are relevant to the product we will be providing to our client.</li> <li>• In limited circumstances, we may also collect information concerning your sex life or sexual orientation for example where you are in a civil partnership with our client.</li> </ul>
2	<p><b>How will we collect your personal information? ►</b></p>
3	<ul style="list-style-type: none"> <li>• Directly from our client.</li> <li>• From documents directly provided to us by our client, such as application forms for products where you are listed as a dependant or employment related documents and you are listed as a business partner of our client.</li> <li>• Our client's SJP Partner directly.</li> <li>• The SJPI and SJP client relationship management system and hosted platforms.</li> </ul>
2	<p><b>What will we use your personal information for? ►</b></p> <p>There are a number of reasons we use your personal information and for each use we need to have a "lawful basis" to do so.</p> <p>We will rely on the following "lawful basis" when we process your "personal information":</p> <ul style="list-style-type: none"> <li>• We have a legal or regulatory obligation to use such personal information. For example, our regulators require us to hold certain records of our dealings with you.</li> <li>• We have a valid business reason to use your personal information which is necessary for our everyday business operations and activities, for example to maintain business records, to review our business models, to undertake strategic and operational business analysis of the products we offer, to maintain management information, and for internal audit purposes.</li> </ul> <p>In each case we assess our need to use this personal information for these purposes against your rights to privacy to ensure we are protecting your rights.</p> <p>When we use your "special categories of personal information" or information relating to relevant</p>

	<p>criminal convictions and offences, we must have an additional "lawful basis" and we will rely on the following lawful basis in these circumstances:</p> <ul style="list-style-type: none"> <li>You have given your explicit consent to our use of your special categories of personal information which may have been provided to us by your family member or business associate who is our client.</li> <li>We need to use your health information for purposes relating to a policy of insurance or life assurance, or a policy of health insurance or health-related insurance.</li> <li>We need to adhere to our regulatory requirement to detect and deter fraud and criminal activities.</li> </ul>
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<b>3</b>	<b>Purpose for processing ►</b>	<b>Lawful basis for using your personal information ►</b>	<b>Lawful basis for using your special categories of personal information or information relating to criminal convictions and offences ►</b>
	To provide products to our clients	<ul style="list-style-type: none"> <li>We have a valid business reason (to fulfil our contractual obligations to our clients and advise on the most appropriate product for their personal circumstances)</li> </ul>	<ul style="list-style-type: none"> <li>You have given us your explicit consent and this has been provided to us by our client or prospective client.</li> <li>We need to use your information in order to establish, exercise or defend legal rights.</li> </ul>
	To prevent and investigate fraud.	<ul style="list-style-type: none"> <li>We have a valid business reason (to prevent and detect fraud and other financial crime).</li> </ul>	<ul style="list-style-type: none"> <li>We need to use your information in order to establish, exercise or defend legal rights.</li> <li>We have your explicit consent and this has been provided to us by our client or prospective client.</li> </ul>
	To comply with our legal or regulatory obligations.	<ul style="list-style-type: none"> <li>We need to use your information in order to comply with our legal obligations.</li> </ul>	<ul style="list-style-type: none"> <li>We need to use your information in order to establish, exercise or defend legal rights.</li> </ul>

		<ul style="list-style-type: none"> <li>We have a valid business reason (to run our business efficiently and effectively).</li> </ul>	<ul style="list-style-type: none"> <li>We have your explicit consent and this has been provided to us by our client or prospective client.</li> <li>The processing relates to health data and is necessary for an insurance purpose.</li> </ul>
	For business purposes and activities including maintaining business records, file keeping, strategic business planning and internal audit, and management information.	<ul style="list-style-type: none"> <li>We have a valid business reason (to run our business efficiently and effectively)</li> </ul>	<ul style="list-style-type: none"> <li>You have given us your explicit consent and this has been provided to us by our client or prospective client.</li> <li>We need to use your information in order to establish, exercise or defend legal rights.</li> <li>The processing relates to health data and is necessary for an insurance purpose.</li> </ul>
2	<b>Who will we share your personal information with? ►</b>		
3	<p>We will not sell or transfer your personal information to anyone unless we have a valid purpose as set out above and we will only disclose it to the following parties:</p> <ul style="list-style-type: none"> <li>Our client's Partner within the St James's Place Partnership (as appropriate) so that the product purchased by our client can be integrated into the wealth management service provided to our client by the relevant Partner.</li> <li>Other St James's Place group companies.</li> <li>Third parties (for example Capita) who carry out verification, anti-money laundering and fraud prevention checks on our behalf.</li> <li>Third parties who carry out client administration services, such as Capita and DST</li> <li>Other third parties who have entered into contractual arrangements with us to provide services we need to carry out our everyday business activities such as partner support specialists, document management providers, back office system providers, secure login and email providers, storage warehouses, IT suppliers, actuaries, auditors, lawyers, fiscal representatives, outsourced business process management providers, our subcontractors</li> </ul>		



and tax advisers.

- Compliance consultants engaged by us.
- Financial crime, fraud detection and credit agencies.
- Our regulators including the Financial Conduct Authority, the Financial Ombudsman Service, the Financial Services Ombudsman and the Central Bank of Ireland.
- Selected third parties in connection with any sale, transfer or disposal of our business.
- Our insurers/reinsurers.
- Discretionary asset managers, fund advisors and reinsurers, custodians and banks.
- National Competent Authorities, to include the Irish Revenue Commissioners, the Data Protection Commissioners (DPC), HM Revenue & Customs (HMRC) and the Information Commissioner (ICO).
- An Garda Síochana and other crime prevention and detection agencies.

1	<b>Other business partners of St James's Place International ►</b>
2	<p>If you are a business partner such as product provider, portfolio or fund manager and contractor who carries out business functions on our behalf, this section will be relevant to you and sets out our uses of your personal information.</p> <p><b>What personal information may we collect? ►</b></p>
3	<ul style="list-style-type: none"> <li>• General information such as your name, address, business phone numbers and email addresses.</li> <li>• Employment information such as job title, business cards and professional accreditations.</li> <li>• Information about your clients and the services and products you offer.</li> <li>• Your bank details and information obtained from checking sanction lists and credit checks</li> <li>• Information which we have gathered from publicly available sources such as internet search engines and generally obtained as part of the due diligence process conducted by SJPI and other St James's Place group companies.</li> </ul>
2	<b>How will we collect your information? ►</b>
3	<ul style="list-style-type: none"> <li>• Directly from you.</li> <li>• From other St James's Place group companies.</li> <li>• From publicly available sources such as internet search engines.</li> <li>• From service providers who carry out sanctions checks including Experian and Capita.</li> </ul>
2	<p><b>What will we use your personal information for? ►</b></p> <p>There are a number of reasons we use your personal information and for each use we need to have a "lawful basis" to do so.</p> <p>We will rely on the following "lawful basis" when we process your "personal information":</p> <ul style="list-style-type: none"> <li>• We need to use your personal information to enter into or perform the contract that we hold with you.</li> <li>• We have a legal or regulatory obligation to use such personal information. For example, we may be required to carry out certain background checks.</li> <li>• We have a valid business reason to use your personal information which is necessary for our everyday business operations and activities, for example to keep records of investments and the reasoning behind such investments, to maintain business records, to carry out due diligence, to review our business models and undertake strategic and operational business analysis. In each case we assess our need to use this personal information for these purposes against your rights to privacy to ensure we are protecting your rights.</li> </ul>

3	<b>Purpose for processing ►</b>	<b>Lawful basis for using your personal information ►</b>	<b>Lawful basis for using your special categories of personal information or information relating to criminal convictions and offences ►</b>
	To carry out fraud, credit and anti-money laundering checks on you	<ul style="list-style-type: none"> <li>• It is necessary to enter into a contract with you.</li> <li>• We have a valid business reason (to assess your suitability as a business partner).</li> <li>• We need to use your information in order to comply with our legal obligations.</li> </ul>	
	To carry out due diligence on you.	<ul style="list-style-type: none"> <li>• We have a valid business reason (to ensure that you can provide guarantees in terms of confidentiality and security measures you implement to protect the information we are sharing with you about our clients).</li> </ul>	
	To comply with our legal or regulatory obligations.	<ul style="list-style-type: none"> <li>• We need to use your information in order to comply with our legal obligations.</li> </ul>	
	For business purposes and activities including maintaining business records, file keeping, strategic business planning and internal audit, and management information.	<ul style="list-style-type: none"> <li>• We have a valid business reason (to run our business efficiently and effectively)</li> </ul>	
	For compliance and monitoring purposes such as recording and managing complaints made against you	<ul style="list-style-type: none"> <li>• It is necessary to enter into a contract with you.</li> <li>• We have a valid business reason (to ensure we are</li> </ul>	

	by our clients.	compliant and carrying out appropriate monitoring activities).	
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2	<b>Who will we share your personal information with? ►</b>
3	<p>We will not sell or transfer your personal information to anyone unless we have a valid reason as set out above and we will only disclose it to the following parties:</p> <ul style="list-style-type: none"> <li>• Where you are providing a product or services to one of our clients on our behalf, the relevant St James's Place Partner where the client receives wealth management services from that Partner.</li> <li>• Other St James's Place group companies.</li> <li>• Third parties who provide sanctions checking services including Experian and Capita.</li> <li>• Third Parties who provide client administration services, such as, Capita and DST</li> <li>• Our regulators including the Financial Conduct Authority, the Financial Ombudsman Service, the Financial Services Ombudsman and the Central Bank of Ireland.</li> <li>• Selected third parties in connection with any sale, transfer or disposal of our business.</li> <li>• Our insurers/reinsurers.</li> <li>• Discretionary asset managers, fund advisors and reinsurers, custodians and banks.</li> <li>• Third parties who have entered into contractual arrangements with us to provide services we need to carry out our everyday business activities such as partner support specialists, document management providers, back office system providers, secure login and email providers, storage warehouses, IT suppliers, actuaries, auditors, lawyers, fiscal representatives, outsourced business process management providers, our subcontractors and tax advisers.</li> <li>• National Competent authorities, to include the Irish Revenue Commissioners, the Data Protection Commissioner (DPC), HM Revenue &amp; Customs (HMRC) and the Information Commissioner (ICO).</li> <li>• An Garda Síochana and other crime prevention and detection agencies.</li> </ul>

## 5. How long do we keep personal information for? ►

1	<p>We will only keep your personal information for as long as reasonably necessary to fulfil the purposes set out in sections 2 - 4 above, to comply with our legal and regulatory obligations or for as long as necessary to respond to concerns you raise with the advice you received. As a financial services firm, we are regulated by the Financial Conduct Authority (the FCA) and the Central Bank of Ireland who imposes certain record-keeping rules which we must adhere to.</p>
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## 6. Reporting obligations to Revenue under FATCA and Common Reporting Standards

All financial institutions operating in Ireland, including SJPI, are required under legislation incorporating into Irish law the US Foreign Account Tax Compliance Act (FATCA) and the Common Reporting Standards to report the

following information to the Irish Revenue Commissioners for all non-resident clients. This information may be transferred by Revenue to the authorities of another jurisdiction under an inter-governmental agreement.

**Reportable Individual Account Holders** – name, address, country of tax residence, Tax Identification Number, date of birth, place of birth, client account number, account balance or value at year end and payments made with respect to the account during the calendar year.

**Reportable Entity Account Holders** – name, address, country of residence, Tax Identification Number, account number, account balance or value at year end and payments made with respect to the account during the calendar year.

**Reportable Controlling Persons of passive Non-Financial Entities (PNFE's)** - name, address, country of tax residence, Tax Identification Number and the name, address and country of residence, Tax Identification Number and date of birth of each controlling person, the account number, account balance or value at year end and payments made with respect to the account during the calendar year.

All transfers of personal information to any third party including Revenue will always be completed securely.

Further information on this reporting requirement may be found on Revenue's website by clicking [here](#).

## 7. What is our approach to sending your personal information overseas ►

1	<p>There are a small number of instances where your personal information may be transferred to countries outside of the European Economic Area ("EEA") such as when we transfer information to our other companies in the SJP group or to third party suppliers who are based outside the EEA or when third parties who act on our behalf transfer your personal information to countries outside the EEA. Where such a transfer takes place, we will take the appropriate safeguarding measures to ensure that your personal information is adequately protected. We will do so in a number of ways including:</p> <ul style="list-style-type: none"><li>• entering into data transfer contracts and using specific contractual provisions that have been approved by European data protection authorities otherwise known as the "standard contractual clauses" You can find out more about standard contractual clauses at <a href="https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/model-contracts-transfer-personal-data-third-countries_en">https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/model-contracts-transfer-personal-data-third-countries_en</a>;</li><li>• We will only transfer personal information to companies in non-EEA countries who have been deemed by European data protection authorities to have adequate levels of data protection for the protection of personal information. You can find out more about this <a href="https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/adequacy-protection-personal-data-non-eu-countries_en">https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/adequacy-protection-personal-data-non-eu-countries_en</a></li></ul> <p>We are also entitled under European data protection laws to transfer your personal information to countries outside the EEA where it is necessary for the performance of the contract we have with you.</p>
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Depending on our relationship and your particular circumstances, we might transfer personal information anywhere in the world. An example of our regular data transfers outside the EEA is set out below:

Country of transfer	Reason for the transfer	Method we use to protect your information
Hong Kong, Singapore, Shanghai	Provision of data to international offices to support clients living overseas.	We have standard contractual clauses in place

If you would like further information regarding our data transfers and the steps we take to safeguard your personal information, please contact us using the details set out in section 10.

## 8. Automated decision making and profiling ►

1	<p><b>What is automated decision making?</b></p> <p>Automated decision making refers to a situation where a decision is taken using personal information that is processed <b>solely</b> by automatic means (i.e. using an algorithm or other computer software) rather than a decision that is made with some form of human involvement. We do not currently use automated decision making as all decisions are reviewed by an individual.</p> <p><b>What is profiling?</b></p> <p>Profiling is any form of automated processing of personal information which evaluates certain personal aspects and we use profiling tools to assist in risk assessment and marketing activities.</p> <p>We will use profiling in a number of circumstances including the following:</p> <ul style="list-style-type: none"> <li>• where you are a prospective client we will use your postcode to determine which SJP Partner is closest to you;</li> <li>• for existing clients – where there are any investment fund switches, we will use systems to monitor irregular activity; and</li> <li>• using a financial strategy segment profiling tool which uses information such as date of birth, occupation and financial information to determine appropriate investment wealth bands.</li> </ul>
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## 9. Your rights ►

1	<p>You have several rights which you can exercise at any time relating to the personal information that we hold about you and use in the ways set out in this notice. Please contact us at any time using the details set out in section 10 if you wish to exercise these rights; we will not usually charge you.</p> <p>We respect your rights and will always consider and assess them but please be aware that there may be some instances where we cannot comply with a request that you make as the consequence might be that:</p> <ul style="list-style-type: none"> <li>• in doing so we could not comply with our own legal or regulatory requirements for example we are under obligations to hold records of our dealings with you for certain periods of time; or</li> <li>• in doing so we could not provide services to you and would have to cancel your client agreement, for example we could not enter into investments on your behalf if we had deleted your personal information.</li> </ul> <p>We will of course inform you if any of the above situations arise and if we are unable to comply with your request.</p>
1	<ul style="list-style-type: none"> <li>• The right to access your personal information ►</li> </ul>
2	<p>You are entitled to a copy of the personal information we hold about you and certain details of how we use it.</p> <p>We are happy to provide you with such details but in the interests of confidentiality, we follow strict disclosure procedures which may mean that we will require proof of identify from you prior to disclosing such information.</p> <p>We will usually provide your personal information to you in writing unless you request otherwise. Where your request has been made electronically (e.g. by email), a copy of your personal information will be provided to you by electronic means where possible.</p> <p>Please complete the Data Subject Request Form to request a copy of the information we hold.</p>
1	<ul style="list-style-type: none"> <li>• The right to rectification ►</li> </ul>
2	<p>Please help us to keep your personal information accurate and up to date so if you believe that there are any inaccuracies, discrepancies or gaps in the information we hold about you, please contact us and ask us to update or amend it.</p>
2	<ul style="list-style-type: none"> <li>• The right to restriction of processing ►</li> </ul>
1	<p>In certain circumstances, you have the right to ask us to stop using your personal information, for example where you think that the personal information we hold about you may be inaccurate or where you think that we no longer need to use your personal information.</p>



2	<ul style="list-style-type: none"> <li>• The right to withdraw your consent ►</li> </ul>
1	Where we rely on your consent to process your personal information, you have the right to withdraw such consent to further use of your personal information.
1	<ul style="list-style-type: none"> <li>• The right to erasure ►</li> </ul>
2	You are entitled to request your personal information to be deleted in certain circumstances such as where we no longer need your personal information for the purpose we originally collected it. When you exercise this right, we need to consider other factors such as our own regulatory obligation, to assess whether we can comply with your request.
1	<ul style="list-style-type: none"> <li>• The right to object to direct marketing ►</li> </ul>
2	<p>You have a choice about whether or not you wish to receive marketing information from us and you have the right to request that we stop sending you marketing messages at any time. You can do this either by clicking on the "unsubscribe" button in any email that we send to you or by contacting us using the details set out in section 10.</p> <p>Please note that, even if you opt out of receiving marketing messages, we may still send you communications which are relevant to the nature of services we offer you.</p>
	<ul style="list-style-type: none"> <li>• The right to object to processing ►</li> </ul>
	In certain circumstances, where we only process your personal data because we have a legitimate business need to do so, you have the right to object to our processing of your personal data.
1	<ul style="list-style-type: none"> <li>• The right to data portability ►</li> </ul>
2	<p>In certain circumstances, you can request that we transfer personal information that you have provided to us to a third party.</p> <p>When you exercise this right, we need to consider other factors such as our own regulatory obligations, to assess whether we can comply with your request</p>
1	<ul style="list-style-type: none"> <li>• Rights relating to automated decision-making ►</li> </ul>
2	Whilst we use software to carry out automated decision making (as set out in section 8 above), we will always have some form of human involvement to check any decisions made that arise out of such automated decisions. This complies with your data protection rights to have a decision taken by automated means reviewed.
1	<ul style="list-style-type: none"> <li>• The right to make a complaint with either the United Kingdom Information Commissioner's Office (ICO) or the Irish Data Protection Commission (DPC). ►</li> </ul>

2	<p>If you believe that we have breached data protection laws when using your personal information, you have a right to complain to the United Kingdom Information Commissioner's Office (ICO) or the Irish Data Protection Commission (DPC).</p> <p>You can visit the ICO's website at <a href="https://ico.org.uk/">https://ico.org.uk/</a> and the DPC's website at <a href="https://www.dataprotection.ie">https://www.dataprotection.ie</a> for more information. Please note that lodging a complaint will not affect any other legal rights or remedies that you have.</p>
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## 10. Contacting us ►

1	<p>If you would like any further information about any of the matters in this notice or if you have any other questions about how we collect, store or use your personal information, you may contact the SJP Data Protection Officer at St. James's Place plc, St. James's Place House, 1 Tetbury Road, Cirencester, Gloucestershire, GL7 1FP, United Kingdom, <a href="mailto:dpo@sjp.co.uk">dpo@sjp.co.uk</a> and 01285718453.</p> <p>You can also contact your Partner at the contact details set out in their Privacy Policy (as provided to you on their headed paper) if you would like any further information about how they collect, store or use your personal information.</p>
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## 11. Cookies

1	<p>The St. James's Place website uses cookies - small text files that are stored on your computer or in your browser - to help us to monitor how visitors use our site and allow us to maintain the optimum experience for website users. The website does not store or capture personal information about you when you visit it, it merely records traffic information. This means information about all of our visitors collectively, for example the number of visits the website receives. In order to respect our visitors' rights of privacy, this information is anonymous and no individual visitor can be identified from it.</p> <p>You can disable and delete cookies by changing the appropriate setting within your browser's 'Help', 'Tools' or 'Settings' menu. Please note that by disabling cookies you may not benefit from some of the features of our site. You can find out more about deleting or controlling cookies by visiting <a href="#">About Cookies</a>.</p> <p>We use <a href="#">Hotjar</a> in order to better understand our users' needs and to optimize this service and experience. Hotjar is a technology service that helps us better understand our users experience (e.g. how much time they spend on which pages, which links they choose to click, what users do and don't like, etc.) and this enables us to build and maintain our service with user feedback. Hotjar uses cookies and other technologies to collect data on our users' behaviour and their devices (in particular device's IP address (captured and stored only in anonymized form), device screen size, device type (unique device identifiers), browser information, geographic location</p>
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(country only), preferred language used to display our website). Hotjar stores this information in a pseudonymized user profile. Neither Hotjar nor we will ever use this information to identify individual users or to match it with further data on an individual user. For further details, please see Hotjar's privacy policy by clicking on this link.

You can opt-out to the creation of a user profile, Hotjar's storing of data about your usage of our site and Hotjar's use of tracking cookies on other websites by following this [opt-out link](#).

Please view our full Cookie policy [here](#).

## 12. Keeping your information safe?

1 At St. James's Place, we take our responsibility to look after your personal information and privacy seriously. In today's world, we have all seen a growing trend in cybercrime and security breaches. We have a number of security measures in place to help prevent fraud and cybercrime.

If we become aware that a personal data breach has occurred and is likely to result in a high risk to the rights and freedoms of our clients, Partners or employees, we will inform them without undue delay.

We have a dedicated group, the 'Information Security Oversight Committee', that provides oversight and guidance to our information security and privacy programme.

The executive body responsible for privacy and data security is the Information Security Oversight Committee (ISOC) - chaired by the Data Protection Officer. ISOC has a reporting line that enables effective escalation of issues up to the Board where appropriate.

We educate and train our employees, Partners and contractors on their information security, fraud prevention and privacy obligations annually.

Our employees, Partners and contractors take part in an annual Information Security training and awareness program and must agree to adhere to the Data Protection Act and our own Information Security Policy that are designed to keep your information safe. These are refreshed each year to reflect the current trends that are being observed across the information security landscape. Information Security awareness also forms part of our new employee induction program.

We also educate our employees in identifying potential financial crime and internal fraud; any suspicious activity is reported to our Financial Crime Prevention team.

When you login, or send us information on the internet we protect the security of this information while it is being transmitted by encrypting it using Secure Sockets Layer (SSL).

When you use your web browser to login, view or share information with us, all electronic information exchanged is encrypted using 2048bit SSL (Secure Sockets Layer) certificate. You can identify this by looking for the HTTPS:// and the padlock in the address bar at the top of your

browser:

Firefox	 <a href="https://www.sjp.co.uk">https://www.sjp.co.uk</a>
Internet Explorer	<a href="https://www.sjp.co.uk/">https://www.sjp.co.uk/</a>   
Chrome	 Secure   <a href="https://www.sjp.co.uk">https://www.sjp.co.uk</a>

We will always interact with you in a safe, secure and consistent manner

To keep your information secure and to protect our clients from fraud, St. James's Place will only interact with you in the following ways. If in doubt, call your St. James's Place Partner directly or alternatively email the St. James's Place Data Protection Office at [dpo@sjp.co.uk](mailto:dpo@sjp.co.uk).

When interacting with you, we will:

Only send funds that you have requested to be withdrawn to a verified bank account in your name.

Verify who you are when speaking to you on the phone, by asking you security questions.

We will not:

Ask you for your password over the phone.

Send you an unsolicited email with a link to our login page asking you to enter your Online Wealth Account credentials.

Ask you for payment or credit card details by email or telephone.

Call you to notify you of a problem, and then request you call us back immediately to discuss the problem further.

We continually review our physical and logical security controls in place across the business.

Physical controls – As well as protecting your digital information, St. James's Place also protects their premises and physical locations where personal data may be used and stored. These measures include security guards, security entrances, secure disposal of confidential waste and hardware, CCTV, personal card access and locks on doors and file storage cabinets, with a 'clear desk' policy to ensure all information is locked away and protected.

Logical controls – St. James's Place uses technical security measures to make sure our systems where we store and use personal information are protected from unauthorised access. Tools such as authentication controls, antivirus, firewalls, malware detection and back-up procedures are used across the business.

All employee emails and devices are encrypted to enable secure transfer and storage of personal information.

	<p>We conduct security testing of our applications and services in a controlled testing environment before they are made available for our clients to use on an ongoing basis.</p> <p>We perform security risk assessments for each of our sites to identify and control risks. External technical assessments are conducted by an independent external 3rd party.</p> <p>Security audits and vendor due diligence are conducted on a continual basis.</p> <p>We have a business resiliency plan with disaster recovery and business continuity testing. The purpose of Business Continuity Management and the St. James's Place Business Continuity Plan, is to provide an effective, predefined and documented framework to respond to an incident affecting the Group's activities. The key drivers in developing the business recovery plans are;</p> <p>To mitigate the risks that could lead to the significant disruption of our products and services to our clients.</p> <p>To provide a recovery plan that supports a timely and full restoration of our products and services for our clients.</p> <p>However, whilst we take appropriate technical and organisational measures to safeguard your Personal Information, please note that we cannot guarantee the security of any data that you transfer over the internet to us.</p>
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### 13. Google Analytics

1	<p>This website uses Google Analytics, a web analytics service provided by Google, Inc. ("Google"). Google Analytics uses cookies (text files placed on your computer) to help the website operators analyse how users use the site. The information generated by the cookie about your use of the website (including your IP address) will be transmitted to and stored by Google on servers in the United States. Google will use this information for the purpose of evaluating your use of the website, compiling reports on website activity for website operators and providing other services relating to website activity and internet usage. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. Google will not associate your IP address with any other data held by Google.</p> <p>In addition, we use Google's remarketing technology to advertise online. In doing so, Google will place or read a unique ad-serving cookie on your computer and will use non-personal information about your browser and your activity on our sites to serve ads on their content network. Please click <a href="#">here</a> for more information about remarketing or to opt-out of the Google remarketing cookie.</p> <p>We will only collect personal information about you if you send us an e-mail enquiry via the 'contact us' facility or you register to receive your Unit Trust Manager's Reports by email. In order for this to happen, you will need to fill out the online 'contact us' form or complete the registration details. The type of information being collected for an enquiry will be apparent from the layout of the 'contact us' form, which also tells you how this information will be used. The type of information collected to register to receive the Unit Trust Manager's Reports by email will be apparent from</p>
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	<p>the details requested when you register. The information collected when you register will only be used to email your Unit Trust Manager's Reports and for no other reason.</p> <p>We take all reasonable precautions to protect our visitors' information, both on and off line. If your personal information changes, please let us know and we will correct, update or remove any information that we hold about you on our active databases. We may however need to retain archive copies of that personal information for legal or audit purposes. If you have any queries regarding the way in which St. James's Place handles data collected from you on this website, please visit the <a href="#">contact us</a> page.</p> <p><b>By using this website, you consent to the processing of data about you by Google in the manner and for the purposes set out in the above four paragraphs.</b></p>
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## 15. Monitoring

1	<p>Please note that if you communicate with us electronically, including by e-mail, telephone or fax, this communication may be randomly monitored and/or recorded to protect the interests of our business and our customers. This includes for the purposes of maintaining customer/service quality standards, detection of and/or prevention of crime and to ensure that St. James's Place employees comply with legal obligations and St. James's Place policies and procedures (including our customer relations practices).</p>
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## 16. Hyperlinks

1	<p>We may provide hyperlinks from this web site ('the Site') to web sites of other organisations including websites of associated companies. Please note that this Privacy Policy applies only to this Site and that St. James's Place will not be liable for the contents of linked web sites or any transactions carried out with organisations operating those web sites.</p>
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## 17. Updates to this notice

1	<p>From time to time we may need to make changes to this notice, for example, as the result of changes to law, technologies, other developments or new products and services being offered.</p> <p>We will provide you with the most up-to-date notice and you can check our website periodically to</p>
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view it or you can request a copy from your St. James's Place Partner.

This notice was last updated on 26/01/2021