

# **Privacy notice**

Saltus Partners LLP incorporates Saltus Investment Managers and Saltus Financial Planning Limited. This privacy notice explains how we use any personal information we collect about you.

## What information do we collect about you?

We collect information about you when you engage us for financial planning advice and/or investment management services. This information will relate to your personal and financial circumstances. It may also include special categories of personal data such as data about your health, if this is necessary for the provision of our services.

We may also collect information when you voluntarily complete client surveys or provide feedback to us.

When you visit our website, cookies are either served directly by us, or by our business partners.

#### Why do we need to collect and use your personal data?

The primary legal basis that we intend to use for the processing of your data is for the performance of our contract with you. The information that we collect about you is essential for us to be able to carry out the services that you require from us effectively. Without collecting your personal data we would also be unable to fulfil our legal and regulatory obligations.

Where special category data is required we will obtain your explicit consent in order to collect and process this information

### Information about connected individuals

We may need to gather personal information about your close family members and dependants in order to provide our service to you effectively. In such cases it will be your responsibility to ensure that you have the consent of the people concerned to pass their information on to us. We'll provide a copy of this privacy notice for them or, where appropriate, ask you to pass the privacy information to them.

# How will we use the information about you?

We collect information about you in order to provide you with the services for which you engage us.

# Who might we share your information with?

If you agree, we may email you about other products or services that we think may be of interest to you. We will not share your information for marketing purposes with companies outside our group of companies.

In order to deliver our services to you effectively we may send your details to third parties such as those that we engage for professional compliance, accountancy or legal services as well as product and platform providers that we use to arrange financial products for you.

Where third parties are involved in processing your data we will have a contract in place with them to ensure that the nature and purpose of the processing is clear, that they are subject to a duty of confidence in processing your data and that they will only act in accordance with our written instructions.

Where it is necessary for your personal data to be forwarded to a third party we will use appropriate security measures to protect your personal data in transit. Such measures include uploading information direct onto the third party website and extracting data from the same website.

To fulfil our obligations in respect of prevention of moneylaundering and other financial crime we may send your details to third party agencies for identity verification purposes.

#### How long do we keep hold of your information?

In principle, your personal data should not be held for longer than is required under the terms of our contract for services with you. However, we are subject to regulatory requirements to retain data for specified minimum periods. We also reserve the right to retain data for longer than this due to the possibility that it may be required to defend a future claim against us. In any case, providing there is no regulatory obligation to retain data, we will not retain your personal data for longer than 10 years following your instruction to leave Saltus or past the time of your death.

You have the right to request deletion of your personal data. We will comply with this request, subject to the restrictions of our regulatory obligations and legitimate interests as noted above.

### How can I access the information you hold about me?

You have the right to request a copy of the information that we hold about you. If you would like a copy of some or all of your personal information please email or write to us using the contact details noted below.

When your personal data is processed by automated means you have the right to ask us to move your personal data to another organisation for their use.

We have an obligation to ensure that your personal information is accurate and up to date. Please ask us to correct or remove any information that you think is incorrect.

#### Automated decision making and profiling

We do not use automated decision and/or profiling.

#### Marketing

We would like to send you information about our products and services and those of other companies in our group which may be of interest to you. If you have agreed to receive marketing information, you may opt out at a later date.

You have a right at any time to stop us from contacting you for marketing purposes or giving your information to other members of the group. If you no longer wish to be contacted for marketing purposes, please contact us by email or post by using the details on page 3.

#### Cookies

We may send cookies to your computer. Cookies are strings of information that are sent out by a website and saved in your computer. We may use session specific cookies and "web bugs" to automatically collect data about website usage when you visit this Site, including your IP address, "click-stream" data regarding the

portions of the site that you visit and the information or other services you obtain or input (including domain name, Internet service provider, protocol, browser type, operating system etc.) ("Usage Information"). This information is collected primarily for purposes of administering the Site, compiling demographic information and monitoring usage and performance of the Site. If you turn off the cookie function you may not receive all the information on the website. When you visit our website, cookies are either served directly by us, or by our business partners. Here is a description of the different kind of cookies we use.

**Essential cookies:** These cookies allow you to use the basic functionality of our website. For example, browsing our website and remembering that you have accepted our disclaimer.

**Performance cookies:** We also use these cookies to help improve the user experience.

**Website analytics cookies:** These cookies allow us to get to know how you use our website. They are used to analyse visitor information such as usage and visitor numbers

Туре	Name	Provider	Purpose
1. Essential	ASP.NET_SessionId	Saltus	This cookie is essential for remembering the 'what' section of the site you are in and remembering that you have accepted the disclaimer.
	cookie_consent_level	Saltus	This cookie stores the cookie consent level you have agreed to.
Туре	Name	Provider	Purpose
2. Performance	RegisteredUserSectionID	Saltus	Allows the website to remember which section of the website you were viewing when you registered.
	username	Saltus	Allows the website to remember your username when using the private investor account area.
	DisclaimerAgreedForFundIDX	Saltus	Allows the website to remember whether you have accepted the disclaimer for a particular fund.
Туре	Name	Provider	Purpose
3. Website Analytics	utma	Google	A cookie for Google Analytics which identifies each user's amount of visits; the time of the first,
			previous and current visit.
	utmb	Google	
	utmb	Google Google	previous and current visit.  A cookie for Google Analytics which only identifies
			previous and current visit.  A cookie for Google Analytics which only identifies

# What can you do if you are unhappy with how your personal data is processed?

You also have a right to lodge a complaint with the supervisory authority for data protection. In the UK this is:

Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF

0303 123 1113 (local rate)

#### Changes to our privacy policy

We keep our privacy policy under regular review and we will place any updates on our webpage at <a href="http://www.saltus.co.uk/">http://www.saltus.co.uk/</a>.

This privacy policy was last updated on 24/04/2018.

#### How to contact us

Please contact us if you have any questions about our privacy policy or information we hold about you: by email at <a href="info@saltus.co.uk">info@saltus.co.uk</a>

Or write to us at:

Saltus LLP Solent Business Park 3700 Parkway Whiteley Fareham PO15 7AW