

Privacy notice

This privacy notice has been prepared on behalf of **Canaccord Genuity Wealth Limited, CG Wealth Planning Limited, Canaccord Genuity Asset Management Limited, Intelligent Capital Limited, Cantab Asset Management Limited, Canaccord Genuity Wealth (International) Limited, Canaccord International Fund Managers Limited and Canaccord International Nominees (Guernsey) Limited (together 'Canaccord', we, us or our).**

It explains how we use personal data we collect about you and your rights in relation to the processing of your data.

To whom does this notice apply?

This notice applies to you if you are an individual customer, their family member, their associate or their authorised person. It applies to you if you are a person associated with a corporate customer (such as a director, beneficial owner or authorised signatory of an IFA, intermediary or other corporate vehicle), or if you are a partner of a partnership. It also applies to you if you are a person associated with a trust or pension vehicle (such as a trustee, settlor, protector or beneficiary). It applies to you if you communicate or transact with us through our branches in Dubai and Singapore.

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

Where do we obtain personal data about you?

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

We may also collect personal data you provide via our website, or when you complete an online enquiry form or where you voluntarily provide feedback or complete customer surveys

We may also obtain some personal data from third parties, including:

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

What personal data do we collect about you?

The personal data we collect and use about you will differ depending on our relationship with you and the products and services you have selected. This may include:

- Personal details: name, address, contact details, age/date of birth, tax ID, national insurance number, employment details
- Due diligence documents: copies of your ID documents (e.g. passport or driving license) proof of address documents (e.g. bank statement or utility bill)
- Use of service: records of transactions, investment information
- Financial information: bank details, details on your assets and liabilities
- Telephone recordings
- Information obtained through our use of cookies, including IP address and browsing history
- Marketing and communication preferences.

Special category data and criminal conviction information

During the course of our relationship, we may collect sensitive personal information about you. This may include:

- Information about your health, including your mental health, which may be relevant to our provision of services to you
- Biometric data to process electronic identity checks.

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.

To meet our regulatory requirements, we may also collect information relating to criminal convictions obtained from our sanction screening checks.

How do we use your personal data?

We will only use your personal data where we have a lawful basis. These lawful bases include where we need to process that data to:

- Perform our contract with you (e.g. deliver our products and services to you)

- Meet our legal obligations (e.g. to conduct identity checks and meet tax reporting and other regulatory obligations)
- Where you have given your consent
- Where we have a legitimate interest (e.g. monitoring to ensure you are receiving an appropriate service)
- To help protect your information and prevent unauthorised access to it
- To generate aggregated, anonymous statistics relating to the use of our website, solely for the purpose of improving our services and user experience
- To provide you with information about other services we offer that are similar to those that you have already engaged us to provide, or enquired about. You may opt out of receiving this information at any point. We may use information about you, including your behaviours and characteristics, to tell you about other services and products that we think you might be interested in. This may include automated processing of your personal information ('profiling') to better understand your needs and help us improve our products and services. This does not include website analytics data used solely for aggregated statistical purposes. Whilst we may use software to help us process this information more efficiently, this does not involve automated decision-making and there will always be human involvement in the decision-making process.
- 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 Canaccord 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.

How long do we keep personal data?

We keep your personal data for as long as is required in order to fulfil our contractual, regulatory or legal obligations. We may also retain personal data to establish, exercise or defend any legal claims and in order to protect and enforce Canaccord Wealth's rights for as long as is reasonably necessary and any personal data may be disclosed to the Courts, regulators and/or other relevant authorities.

Where it may not be possible for technical reasons to delete your personal data, Canaccord Wealth may use pseudonymisation techniques provided that pseudonymised data cannot be traced back to the data subject.

Who do we share your personal data with?

We may share your personal data with the following:

- Our counterparties (including banks, custodians, sub-custodians, brokers, settlement agents, stock exchanges)
- Providers of investment products or services, including providers of pensions, offshore bonds, onshore bonds, trusts, investment platforms, insurance products, fund administrators, SIPP administrators, 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 Identity checking service provider, TransUnion. In order to undertake identity checks at onboarding and throughout our relationship with you, we will supply some of your personal information to TransUnion International UK Limited which is a credit reference agency which we use for identity verification purposes. More information about TransUnion and the ways in which it uses and shares personal information can be found in its privacy notice at www.transunion.co.uk/legal-information/bureau-privacy-notice. Please also refer to TransUnion's Credit Reference Agency Information Notice (CRAIN) which explains how and why they use and share personal data, the type of data held, where it comes from and the legalities of how it is handled. A link to the CRAIN can be found here www.transunion.co.uk/crain. We may share your personal data with other identity checking service providers from time to time
- Our IT providers and service providers in order to provide and maintain the provision of our services, including emergency support
- Our 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
- Our insurers, including any re-insurers and our insurance brokers
- 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, Guernsey Financial Services Commission, Jersey Financial Services Commission or Isle of Man Financial Services Authority or any other applicable regulatory body depending on the jurisdiction where your account is administered
- The Information Commissioner's Office in the UK, the Office of the Data Protection Commissioner in Guernsey, the Office of the Information Commissioner in Jersey and the Isle of Man Information Commissioner, as applicable, or any relevant regulatory authority where they are entitled to require disclosure
- 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
- Other companies within the Canaccord Genuity group
- If some or all of Canaccord Wealth's 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 may share your contact details with market researchers so that they may contract you to gather feedback about our products and services. You may decline to participate in any such market research activities.

We will not sell your personal data 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 data?

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.

For individuals who have dealings with our branch offices in Dubai and Singapore, there are instances where your personal information will be transferred outside of your local jurisdiction. This includes transferring information to other companies within the Canaccord group. When such transfers occur, safeguarding measures are adopted to ensure that your personal data remains secure. These measures include:

- Transferring personal information to countries that the local supervisory authority has deemed to have adequate levels of protection; or
- Ensuring that there are appropriate data transfer agreements and control provisions in place.

Marketing

If you agree, we may send you information about new products and services, including those of other companies in the Canaccord Genuity group 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.

You have the right at any time to stop us from contacting you for marketing purposes and to opt out of other communications. If you no longer wish to be contacted for marketing purposes or you wish to opt out of other communications which you receive as part of your service, please use the unsubscribe button on each communication, or email us at marketing@canaccord.com or write to us using the details at the end of this notice.

Use of artificial intelligence, data analytics and profiling

We use technology, including artificial intelligence, data analytics and automated tools, to support the services we provide to you and the administration and management of our relationship with you.

This may include:

- Meeting records and notes. Where appropriate, we may use technology to record, transcribe, summarise or generate notes of meetings and conversations with you. This helps us maintain accurate records of our discussions, identify information or actions arising from them and support the provision of our services. The information processed may include personal and financial information that you provide during those conversations.
- Understanding your circumstances and servicing needs. We may analyse information we already hold about you and your relationship with us, including information about your personal and financial circumstances, account activity, investments and portfolio, relationships with other clients or accounts, and other relevant characteristics. We may use data analytics, profiling and automated tools to identify matters which may be relevant to the services we provide to you.
- Identifying potential actions or opportunities. This analysis may generate suggestions or recommendations for our staff, for example where the information we hold indicates that you may have financial planning needs, that your circumstances may have changed, or that another product, service or action may be relevant to you. This may include matters relating to retirement planning, intergenerational wealth planning, consolidation of assets, client servicing or retention and other financial planning requirements.
- Management, monitoring and improvement of our services. We may also use technology and data analytics to produce management information, monitor the quality and consistency of our services, identify risks or potential missed actions, improve our processes and better understand how our products and services are being used.

These technologies are intended to support our employees rather than replace their judgement. Where a system identifies a potential action, recommendation or opportunity concerning you, the relevant member of staff is responsible for considering the information and deciding what, if any, action is appropriate. We do not make decisions which have legal or similarly significant effects on you solely by automated means.

Website usage and cookies

We use cookies and similar technologies on our website to improve your experience and to understand how our services are used.

Some cookies are strictly necessary for the operation of our website and do not require your consent.

We also use cookies for statistical and analytical purposes to help us understand how visitors use our website (for example, via tools such as Google Analytics). These cookies:

- are used solely to produce aggregated statistics,
- do not identify you directly, and
- are used only by us to improve the performance and usability of our website.

Where these cookies meet the requirements under applicable data protection legislation, we may rely on a lawful exemption from consent. However, you will always be provided with:

- clear information about how these cookies are used; and
- a simple and free means to object or opt out of their use.

We will only use cookies for advertising, tracking or profiling purposes where you have provided your consent. You can withdraw your consent at any time.

You can manage your cookie preferences at any time via www.canaccord-wealth.com/gg/internet-use-policy.

Your rights

You have certain rights in respect of the data we hold relating to you. These include:

- The right of access to the information we hold about you
- The right to be informed about how and why we use your data
- The right to update or correct your personal information (right to rectification)
- The right to delete your information
- The right to portability of your data.

In some circumstances you also have the right to:

- Object to processing
- Object to profiling.

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.

Exercising your rights

In order to exercise these rights or if you have any concerns about our use of your personal information, please contact us using the information at the end of this notice.

Further information

Further information on your data protection rights can be found on websites of our data protection regulators whose details appear at the end of this notice.

Additional control over website tracking

Where we rely on cookies for statistical or analytical purposes, you have the right to object to this processing at any time.

You can exercise this right by adjusting your cookie preferences through our website settings. This will not affect your ability to use our website.

Security

We take our responsibility to look after your personal information seriously and have implemented appropriate measures to keep your personal data secure and confidential. We regularly review our security controls and policies to ensure we protect your personal information.

Internet communication, which includes email, is not secure. 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.

Changes to our privacy notice

We keep our privacy notice under regular review to ensure it reflects current data protection legislation. We reserve the right to update this privacy notice at any time and we will advise you when we make any substantial update to it.

How to contact us

If you have any questions about our privacy notice or the personal data we hold about you please contact us by emailing us at marketing@canaccord.com. If you would like to write to us, our address is:

/ Canaccord Genuity Wealth Limited
/ CG Wealth Planning Limited
/ Canaccord Genuity Asset Management Limited
/ Intelligent Capital Limited
/ Cantab Asset Management Limited

Company Secretary
88 Wood Street
London EC2V 7QR

Email: DPO@Canaccord.com

/ Canaccord Genuity Wealth (International) Limited
/ Canaccord International Fund Managers Limited
/ Canaccord International Nominees (Guernsey) Limited

Company Secretary
Dorey Court
Elizabeth Avenue
St. Peter Port
Guernsey GY1 2HT

Email: DPO@Canaccord.com

How to contact our data protection regulators

If you are not satisfied with our response and would like to complain, or raise a concern, you can contact our data protection regulators:

UK

The Information Commissioner's Office (ICO)

Wycliffe House
Water Lane
Wilmslow
Cheshire SK9 5AF

Tel: 0303 123 1113
www.ico.org.uk

Guernsey

The Office of the Data Protection Authority

Block A
Lefebvre Court
Lefebvre Street
St Peter Port GY1 2JP

Tel: +44 1481 742074
www.odpa.gg

Isle of Man

Information Commissioner

First floor, Prospect House
Prospect Hill
Douglas IM1 1ET

Tel: +44 1624 693260
www.inforights.im

Jersey

Jersey Office of the Information Commissioner

Office of the Information Commissioner
2nd Floor, 5 Castle Street
St Helier
Jersey JE2 3BT

Tel: +44 1534 716530
www.jerseyoic.org

Dubai

Commission of Data Protection, Dubai International Finance Centre (DIFC)

www.difc.ae

Singapore

Personal Data Protection Commission (PDPC)

www.pdpc.gov.sg