

SARANAC

PARTNERS

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# Privacy Notice

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# Privacy Notice

Saranac Partners Limited (Saranac Partners) is a London based wealth manager incorporated in the UK, regulated by the Financial Conduct Authority and registered as a data controller with the Information Commissioners Office.

Saranac Partners is committed to protecting your privacy and ensuring you are fully aware of the information we may hold on you and how that information might be used in the course of providing Services to you. This policy (together with our Terms of Business) explains how we collect, and safeguard your personal data.

By signing our Terms of Business and / or visiting our website you are acknowledging and accepting the practices described below.

## **Information we collect**

We collect personal information as part of our due diligence process on both existing and prospective clients. The process includes gathering intelligence from publicly available sources and the collection of physical forms of identity and address verification such as copies of passports, driving license or other legal documents.

You may provide additional information by corresponding with us via phone, email, or other means including interactions with our website or our dedicated client portal where we have granted you access.

The information you provide may include your (or your client's) name, address, email address, phone number, financial information or other relevant personal details. We will avoid requesting or holding sensitive personal data (racial or ethnic origin; political opinions; religious beliefs; trade union membership; physical or mental health or condition; sexual life; criminal offences) except where necessary to comply with our regulatory obligations.

By sharing these details to us, you confirm that you are entitled to share personal information, and where you are acting in a third party capacity that you have received the necessary authorisations to share information on behalf of the underlying client.

## **Information we gather from other sources**

In the process of gathering information on you as a prospective client or providing services to you we will engage with a range of third party providers such as credit and fraud prevention agencies in order to gather relevant data about you and your circumstances. These agencies may also give us additional details and information from the Electoral Register in order to aid identify verification.

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If you have authorised a third party to contact us, or authorised us to contact a third party on your behalf you acknowledge we may receive and store additional information they provide to us. When dealing with any third party in relation to your details we will always undertake a thorough security check prior to any discussion.

### **Retention period**

Typically our regulator, the Financial Conduct Authority, requires to hold clients data for up to 5 years following the end of our relationship. This may be extended to 7 years upon receipt of a specific request from our regulator in certain circumstances.

### **Recording phone calls**

We may monitor or record phone calls with you in case we need to check we have carried out your instructions correctly, to resolve queries or issues, for regulatory purposes, to help improve our quality of service, and to help detect or prevent fraud or other crimes. Conversations may also be monitored or reviewed for staff training purposes.

### **How we use your information**

We will continually review and assess the quality and quantity of personal information we hold, and observe your rights under applicable privacy and data protection laws. Where we provide investment services you agree and acknowledge personal data will be shared with your underlying custodian on an ongoing basis.

Information you give us may be used in the following ways:

1. to provide you with information (by various means including but not limited to post, email and phone), products and services that you have requested from us or which we may reasonably believe would be of interest to you;
2. to carry out our obligations as a result of any contracts entered into between you and us, and any investments entered into through us;
3. to comply with our legal and regulatory obligations;
4. for research and development of products and services;
5. to ensure that content of our website or client portal is presented in the most efficient manner for you and your computer;
6. to notify you about changes to our website or policies and;
7. to allow you to participate in any interactive site features, which we may make available, should you choose to do so

You can exercise your right to prevent such processing by checking certain boxes on the forms we use to collect your data. You can also exercise this right at any time by contacting us.

We may also use your information to provide you with information about services of carefully selected associates or affiliates of Saranac Partners where you agree for us to share certain information with those parties. Where this occurs, those parties are also required to protect your personal information.

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We may disclose your personal data to third parties, located anywhere in the EEA (European Economic Area), for the reasons, and in accordance with the procedures set out in this Notice. Your information may be disclosed to our service providers where they have offices outside the EEA. Such disclosure will be subject to model contractual clauses approved by the EU, or will be restricted to providers who operate in countries which the EU has deemed to have adequate data protection regimes.

### **When we disclose your information**

We will not share your information with third party entities without your express prior permission other than in the instances detailed below.

- (a) to perform our obligations under our agreement with you.
- (b) if we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our Terms and Conditions and other agreements or to protect the rights, property, or safety of Saranac Partners, our clients, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction, or with law enforcement or regulatory agencies.
- (c) in the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets.
- (d) if Saranac Partners Ltd or substantially all of its assets are acquired by a third party, as the personal data we hold about our customers will be one of the transferred assets.
- (e) with our auditors, advisors and our regulator, the Financial Conduct Authority (FCA) in the course of their normal duties.

### **Where and how we store your personal data**

We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Notice.

We maintain strict security standards and procedures with a view to preventing unauthorised access to your data by anyone, including our staff. We use technologies such as (but not limited to) data encryption, firewalls and server authentication to protect the security of your data. All our staff and third parties, are required to observe our privacy standards and to allow us to audit them for compliance.

Where we have provided access to the client portal you acknowledge that the transmission of information via the internet cannot be entirely secure. You are responsible for ensuring any passwords and logon credentials are kept secure.

We will implement and adhere to information retention policies relating to your information and will ensure that your information is securely disposed of at the end of the appropriate retention period.

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## **Cookies**

Our websites use cookies to distinguish you from other users of our web site. This allows us to improve our site and provide an enhanced experience for our clients. For detailed information on the cookies we use and purposes for which we use them, please refer to our cookie policy.

## **Right of access**

The Act gives you the right to access information we hold about you in written or electronic form. Your right of access can be exercised at any time and is free of charge.

## **Right to rectification**

If you believe the data we hold is inaccurate or incomplete you are entitled to have this rectified, typically within one month. Where this data has been passed to a third party the rectification should also include the data passed to that third party.

## **Right to erasure**

Where your personal data is no longer needed for the purpose for which it was collected you may request that the data be erased provided that the data is no longer needed to comply with legal or regulatory obligations (see Retention Period).

## **Restriction on processing**

You have the right to ask us not to process your personal data in the following circumstances:

- you believe the data held is inaccurate;
- you object to the processing on the grounds that there is no legitimate purpose;
- you believe the processing is unlawful;
- you require the data to be held to defend a legal claim, but require that it is no longer processed.

## **Right to data portability**

Should you have a need to transfer your personal data to another financial services provider we will, within one month, provide your data in a structured, machine readable form provided the format required is compatible with our existing systems.

## **Right to object**

You can request any direct marketing activity to cease at any time. You also have the right to object to any other form of processing if you have compelling grounds relating to your particular situation. Such requests may however, be refused if there is a regulatory requirement or if required for the defence of legal claims.

Please note, however, you cannot opt-out of receiving regulatory or legal updates (e.g. information about a change in the product terms and conditions) by email.

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## **Complaints**

If you believe that we have processed your data in a way that does not comply with the GDPR you have the right to complain directly to the Information Commissioners Office (ICO). See the ICO's website at <https://ico.org.uk/concerns> or telephone on **0303 123 1113**.

Our site may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates ('Third Party Sites'). If you follow a link to any of these Third Party Sites, please note that these Third Party Sites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these Third Party Sites.

## **Changes to the notice**

Any future changes to our Privacy Notice or to other policies found on this site will be posted to the relevant pages, and where appropriate, notified to you by email. We know that you are concerned with how your personal and financial information is dealt with. This privacy statement sets out our current policies and demonstrates our commitment to your financial privacy. We may change the content or services found on our Site at any time without notice, and consequently our privacy notice may change at any time in the future.

## **Contact details**

Questions, comments and requests regarding this Privacy Notice are welcomed and should be addressed via email to the Data Protection Officer at [compliance@saranacpartners.com](mailto:compliance@saranacpartners.com) or telephone: **0207 509 5700**.