# **Privacy policy**

This privacy policy sets out how Regent Investment Management (RIM) London uses and protects any information that you give us when you use this website.

Regent Investment Management (RIM) London is committed to ensuring that your privacy is protected. Should we ask you to provide certain information by which you can be identified when using this website, then you can be assured that it will only be used in accordance with this privacy statement.

Regent Investment Management (RIM) London may change this policy from time to time by updating this page. You should check this page from time to time to ensure that you are happy with any changes. This policy is effective from 01/02/2018.

# What we collect

We may collect the following information:

- name and job title
- contact information including email address and phone number
- demographic information such as postcode, preferences and interests
- other information relevant to customer surveys and/or offers

# What we do with the information we gather

We require this information to understand your needs and provide you with a better service, and in particular for the following reasons:

- Internal record keeping.
- We may use the information to improve our products and services.
- We may periodically send promotional emails about new products, special offers or other information which we think you may find interesting using the email address which you have provided.
- From time to time, we may also use your information to contact you for market research purposes. We may contact you by email, phone, fax or mail. We may use the information to customise the website according to your interests.

# How long we hold your personal data for

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

We keep prospective customer data for which we obtained explicit consent for 3 years after which time we will seek to renew consent.

We keep basic personal data about our customers for the duration of your business relationship with us and thereafter as required for legal and audit purposes.

We retain testimonials until withdrawn at your request.

We retain personal information linked to service support requests indefinitely because historical data about service issues is always relevant to service development.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

## Security

We are committed to ensuring that your information is secure. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the information we collect online.

## International transfers

Some of the third parties that we may share your personal data with could be based outside the EEA (such as our marketing office in Sri Lanka) so their processing of your personal data will involve a transfer of data outside the EEA.

Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission. For further details, see <u>European</u> <u>Commission: Adequacy of the protection of personal data in non-EU countries.</u>

#### How we use cookies

A cookie is a small file which asks permission to be placed on your computer's hard drive. Once you agree, the file is added and the cookie helps analyse web traffic or lets you know when you visit a particular site. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences.

We use traffic log cookies to identify which pages are being used. This helps us analyse data about web page traffic and improve our website in order to tailor it to customer needs. We only use this information for statistical analysis purposes and then the data is removed from the system.

Overall, cookies help us provide you with a better website, by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us.

You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of the website.

## Links to other websites

Our website may contain links to other websites of interest. However, once you have used these links to leave our site, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this privacy statement. You should exercise caution and look at the privacy statement applicable to the website in question.

# Controlling your personal information

- **Right of access –** The personal information we hold about you belongs to you and not us, you have the right to access to all personal information we hold.
- **Right of rectification** If we have incorrect information about you, then you have the right to correct that information.
- **Right of erasure –** If we do not have a valid reason to hold or process your information you can request that we erase the information.
- **Right of restriction** If you believe that we do not have a valid reason to hold your information, you have the right to force us to stop processing until you allow us to, or we can prove that we do have a valid reason.

You may choose to restrict the collection or use of your personal information in the following ways:

 if you have previously agreed to us using your personal information for direct marketing purposes, you may change your mind at any time by writing to or emailing us at info@rimlondon.com

We will not sell, distribute or lease your personal information to third parties unless we have your permission or are required by law to do so. We may use your personal information to send you promotional information about third parties which we think you may find interesting if you tell us that you wish this to happen.

You may request details of personal information which we hold about you under the Data Protection Act 1998. A small fee will be payable. If you would like a copy of the information held on you please write to **Regent Investment Management (RIM) London, Regent House, 167 Imperial Drive, Harrow, HA2 7HD or email** info@rimlondon.com

If you believe that any information we are holding on you is incorrect or incomplete, please write to or email us as soon as possible, at the above address. We will promptly correct any information found to be incorrect.