



# Privacy Policy

V1. February 2024

Gildencrest is committed to protecting the privacy of all personal information that we obtain from you. Our Privacy Policy explains how and why we collect personal information about you, and how that information is maintained and used (“Privacy Policy”). By using our services, you agree to this Privacy Policy. This Privacy Policy applies to prospective, current and previous customers and covers the following:

- Our obligations
- The information we collect and how we collect it
- Why we collect your information
- How we use your information
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- How we protect your information
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## Our obligations

Gildencrest is required to be registered to be able to collect and process personal data. We are registered with Information Commissioner's Office in the United Kingdom, under reference number ZA134509. We have legal obligations that we must adhere to in relation to the collection and processing of your personal data:

- we must only collect and process personal data where it is allowed by law, or is performed with your consent;
- personal data must be collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes;
- personal data collection management and use must be adequate, relevant and limited to what is necessary in relation to the purposes for which it is processed;
- personal data must be accurate and where necessary must be kept up-to-date;
- personal data must be kept in a form which permits identification of data subjects in the longer than is necessary for the purposes for which the personal data is processed, or as necessary by law; and
- personal data must be processed in a manner that ensures appropriate data security including protection against unauthorised wrongful processing and against accidental loss destruction or damage.

## The information we collect and how we collect it

We will collect and process the following personal information about you:

- **Information you provide to us**

You provide us with personal information by filling in the application or other forms on our website, the iOS or Android application (Apps) or the Gildencrest platforms, by accessing and trading on your account through our platform or by corresponding with us by phone, email or otherwise. The information you provide us may include your name, email address, physical address, home and mobile phone numbers, contact details, financial information about your income and wealth, identification information such as National Insurance or National Identification number, date of birth, IP address, device ID, MAC address, professional and employment details, records of products and services you've obtained or applied for, trading history and other analogous personal information.

- **Information we collect about you**

We will also collect information about you through your use of this website, the iOS or Android application (Apps) and our platform. This information may include site areas visited, pages viewed, frequency and duration of visits.

- **Information we receive from other sources**

We may also collect your personal information from third parties, including, for example, business partners, analytics providers, search information providers, credit reference agencies and third-party marketing companies or through publicly available sources.

- **Monitoring of communications**

Subject to applicable laws, we will monitor and record your calls, emails, text messages, app and digital communications, social media messages and other communications in relation to your dealings with us. We will do this for regulatory compliance, crime prevention and detection purposes, to protect the security of our communications systems and procedures, for quality control and staff training, and so we can provide you with a record of what's been said when you require one. We will also monitor activities on your account where necessary for these reasons and this is justified by our legitimate interests or our legal obligations.

## Why we collect your information

Gildencrest collects your personal information in order to provide you with our products and services, to establish and manage your account and to comply with the law. By collecting your information, Gildencrest is able to monitor and improve the services we offer to our existing and potential clients.

## How we use your information

Gildencrest may use your personal information for one or more of the following purposes:

- To provide the services to you that you have requested including processing transactions, and customer support;
- To verify your identity when you contact us;
- To conduct security operations such as using your IP address to verify your identity when you log on to your account;
- To carry out fraud prevention checks;
- To maintain your personal profile and manage your account;
- To contact you when necessary or appropriate in relation to the services being provided to you;
- To keep you updated while you are a client in relation to matters such as your trading or investment activities;
- To manage and administer the products and services provided to you;
- To provide you with information regarding the products and services offered by Gildencrest;
- To offer you additional services such as a community forum;
- To develop an understanding of the products and services that you may be interested in obtaining from Gildencrest;
- To provide you with information or opportunities that we believe may be relevant to you;
- To tailor the website, the iOS and Android application (Apps), or other services we provide to you to meet your needs and interests; and
- To create anonymised statistical data we may share anonymised data with other companies; however this data will not include any information that personally identifies you.

When we collect and use your personal information, we will make sure this is only done in accordance with at least one of the legal grounds available to us under Data Protection law.

If Gildencrest or a fraud prevention agency determine that you pose a risk of fraud or money laundering, or other financial crime, we may refuse or stop providing our services to you.

### **Using your personal data: the legal basis and purposes**

We will process your personal data to provide services to you pursuant to the agreement between us in relation to the relevant account(s). This includes:

- Taking steps at your request prior to entering into the agreement;
- Deciding whether we should enter into an agreement with you;
- Managing and performing our obligations under the agreement;
- Updating your records;
- Tracing your whereabouts or contacting you about your account and recovering any debt; and
- Verifying your identity including when you log on to your account online or when contacting us.
- As necessary for our (or our authorised third parties') legitimate interests, for example:
  - For good governance, accounting, and managing and auditing your business operations;
  - To carry out credit reference agency searches;

- To monitor emails, calls, other communications, and activities on your account, subject to applicable laws;
- For market research, analysis and developing statistics;
- To analyse your personal information, as well as your trading activity, so that we can offer a more relevant, tailored service and product offering to you;
- To carry out marketing and send communications, including by email, post, text, digital communications, through our application (Apps), newsletter, banner advertising and other forms of communication including social media campaigns;
- To develop new services and improve the products and services we provide; and
- To request your feedback on a product or service via a third party we have chosen.

You have the right to ask us not to process your personal information for marketing purposes. You can do this by changing your marketing preferences and privacy settings when you log in to your account, using the unsubscribe link provided in relevant emails we send you, or you can also opt out of receiving marketing communications by contacting the customer service team.

We will also process your personal data as necessary to comply with a legal obligation, for example:

- When you exercise your rights under data protection law and make requests;
- For compliance with legal and regulatory requirements and related disclosures;
- For activities relating to the prevention, detection and investigation of crime;
- For establishment and defence of legal rights;
- To verify your identity, fraud prevention and anti-money laundering checks; and
- To monitor emails, calls, other communications, and activities on your account.

We will process your personal data based on your consent, for example:

- When you request us to disclose your personal data to other people or organisations such as a company handling a claim on your behalf, or otherwise agree to disclosures;
- To comply with our legal obligations and to allow us to identify you for authenticating, reporting, compliance and customer service purposes;
- To carry out marketing in instances when we have asked for your consent and you have provided it; and
- To provide our community forum to you if applicable.

You are free at any time to change your mind and withdraw your consent by notifying us.

## Who we may disclose your information to

Gildencrest may share your personal information with:

- Entities in the Gildencrest Group to develop an understanding of the products and services that you may be interested in obtaining from Gildencrest Group and for other legitimate business purposes;
- The Financial Conduct Authority and other regulatory and government bodies from time to time in the UK and other countries;
- Any court or tribunal;
- Financial institutions and other similar organisations that we deal with in the course of our corporate activities or those that are nominated by you;
- Fraud prevention and law enforcement agencies if false or inaccurate information is provided and fraud is identified;
- Anyone else where we have your consent or where we have another lawful basis for doing so;
- An introducing broker if you were introduced to Gildencrest by an introducing broker;
- External service providers and professional advisers (which may be located overseas) that provide services to Gildencrest, including credit reference agencies;
- Any organisation at your request or any persons acting on your behalf, including your financial adviser, broker, solicitor or accountant;
- Any third-party service providers where this is necessary to process a transaction or provide services which you have requested (e.g. software providers);
- Any authority to whom Gildencrest is required to disclose such information by law;
- Other financial institutions for the prevention and detection of financial crime, including fraud, money laundering, and terrorism financing; or
- Other parties connected with your account (e.g. other people named on the application).

We do not sell your personal information to third parties for marketing purposes.

## How we protect your information

Gildencrest is committed to protecting the privacy of all personal information that Gildencrest obtains from you. We continue to adopt industry and information security best practices to protect your personal information and ensure that unauthorised persons do not access it. Measures include encryption of data during transmission, strong authentication mechanisms, cybersecurity processes and secure access to machines and data.

We train our employees who handle personal information to respect the confidentiality of customer data and the privacy of individuals.

Gildencrest also requires that external organisations, outside of Gildencrest, who handle or obtain personal information, acknowledge the confidentiality of this information and undertake to respect any individual's right to privacy and comply with all of the relevant data protection laws and this Privacy Policy.

## How we protect your information in data transfers

We may transfer personal information to other countries outside of the United Kingdom, such as Turkey and the United Arab Emirates. In such circumstances, we will ensure the transfer is lawful and that there are appropriate contractual, legal and security arrangements in place.

## How you can protect your information

Just as at Gildencrest, you should care about the security of your personal data. Do not give your security details to log in to your account, such as passwords or passcodes, to anyone else. If you feel someone may have gained knowledge of your login details, please contact us so we can support you and protect you and your information.

Additionally, we recommend securing your devices with a password or passcode. If you use our mobile app, we recommend that you enable the use of Touch ID or Face ID.

## How long we hold your information

We will remove any personal information that will identify you or we will securely destroy the records when we consider that that personal information is no longer required. This could be a period of seven years after our business relationship with you has ended.

However, we may need to maintain certain records for a longer period, for example, where we are required to hold your personal information for regulatory or legal purposes, to provide you with the services you have requested or to maintain adequate business records.

## Cookies and our cookie policy

Gildencrest uses cookies to gather information about your access to this website, the Gildencrest application (Apps) and other services we provide to you.

Cookies are small pieces of information, which use a unique identification tag and are stored on your device because of you using this website or other service we provide to you.

They enhance your browsing experience in various ways, which include remembering your preference settings, displaying relevant content and ensuring web pages function as intended. For detailed information on the cookies we use and the purposes for which we use them, see our cookie policy.

When you use this website or other services, we provide to you, you may be able to link to other websites. This Privacy Policy does not apply to those sites. Gildencrest encourages you to read the privacy policies on such sites.

## Your rights

You have legal rights in respect of the personal information we hold about you. These include:

- The right to be informed about processing of your personal data;
- The right to request access to a copy of your personal data and information about how we process it;
- The right to have your personal data corrected if it's inaccurate and to have incomplete personal data completed;
- The right to have your personal data erased (the "right to be forgotten");
- The right to restrict processing of your personal data;
- The right to move, copy or transfer your personal data ("data portability");
- The right to object to processing of your personal data; and
- Rights in relation to automated decision making including profiling.

Please note, some of these rights only apply in certain circumstances and we may not be able to fulfil every request.

Should you request us to do so, we will stop processing your personal data unless the processing is for the establishment, exercise or defence of legal claims or we have a legitimate business purpose or legal grounds for the processing.

## What to do if you have a complaint

If you have any questions or complaints about the way Gildencrest handles your information, please contact us. If Gildencrest does not resolve a complaint to your satisfaction, you have the right to lodge a complaint with the Information Commissioner's Office in the UK.

## How to contact us

If you have any questions about this Privacy Policy or want to exercise your rights, please contact us by emailing [compliance@gildencrest.co.uk](mailto:compliance@gildencrest.co.uk), or telephoning on +44 20 3048 4764.

## Changes to our Privacy Policy

Gildencrest may change this Privacy Policy from time to time. When such a change is made, we will post a revised version online. Changes will be effective from the point at which they are posted. It is your responsibility to review this Privacy Policy periodically, so you are aware of any changes.