

## **Slater Investments Limited**

### **Website Privacy and Cookie Policy**

Slater Investments Limited (**'Company'**) is a 'data controller' and gathers and uses certain information about you. This privacy policy relates to your use of our website only. In this notice, references to 'we' 'our' or 'us' means the Company.

We take your privacy very seriously and protecting your personal information is extremely important to us. Please read this privacy policy carefully as it contains important information on who we are and how and why we collect, store, use and share your personal data. It also explains your rights in relation to your personal data and how to contact us or supervisory authorities in the event you have a complaint.

We collect, use and are responsible for certain personal data about you. When we do so we are subject to the UK General Data Protection Regulation (UK GDPR).

### **The personal information we collect and use**

#### ***Information collected by us***

We may collect and process the following data about you. This is not a definitive list, details may change from time to time and will depend on the particular activities carried out through our website:

- details of your visits to this site including, but not limited to, traffic data, device data, location data and other communication data.
- information that you provide by filling in forms on this site. This includes information provided at the time of registering to use our online access section of the website, using the dealing service available or any requesting further information.
- information that you provide when you communicate with us by any means.

#### ***How your personal data is collected***

We collect personal data from you:

- directly, when you enter or send us information, such as when you contact us, and
- indirectly, such as your browsing activity while on our website, we will usually collect information indirectly using the technologies to support the functioning of our websites and applications. (see below: ***'IP Addresses and Cookies'***).

#### ***How and why we use your personal information***

We can only use your personal data if we have a proper reason e.g.

- where you have given consent
- to comply with our legal and regulatory obligations
- for the performance of a contract with you or to take steps at your request before entering into a contract or
- for our legitimate interests or those of a third party.

We may typically use your personal information for the following purposes. This is not a definitive list, may change from time to time and will depend on the particular activities carried out through our website:

- we may also use the information we collect in order to inform you about changes to the website and subject to any applicable local laws, other information that we think may be of interest and/or useful to you including our products and services.
- with your consent, we may use the information for direct marketing purposes (see below: ***‘Marketing’***).
- we may also use the information to respond to your enquiries or comments submitted through the website.
- we may use the information to enforce legal rights or defend or undertake legal proceedings.
- we may use the information to customise our website and its content to your particular preferences based on a record of your selected preferences or on your use of the website (see below: ***‘IP Addresses and Cookies’***).
- we may retain and evaluate information on your recent visit to our website and how you move around different sections of our website for analytics purposes to understand how people use our website so that we can make it more intuitive or to check our website is working as intended (see below: ***‘IP Addresses and Cookies’***).
- as may otherwise be necessary for responsible corporate governance or as otherwise required or permitted by applicable laws and/or regulations.

The information may be used for legal and regulatory compliance purposes, including as necessary to respond to governmental, regulatory or law enforcement agency requests; to ensure the continuing security and integrity of our systems, business dealings, reputation or the security and reputation of Slater Investments Limited and its staff; to identify misuse of our systems and any fraud or other illegal or unlawful activity or any other activity which is or may be contrary to our legal and regulatory compliance obligations.

### ***Monitoring and interception of communications***

Emails and communications sent through the website, as between you and our staff, may be monitored and, in specific circumstances, intercepted, for legal and regulatory compliance purposes; to ensure the continuing security and integrity of our systems, business dealings, or the security and reputation of Slater Investments Limited and its staff; and for all other purposes as may be required or permitted by applicable legal and regulatory obligations.

### ***Marketing***

We will use your personal data to send you marketing information about our products and services where you have provided your consent for us to do so. You have the right to opt out of receiving marketing information at any time by:

- contacting us at [operations@slaterinvestments.com](mailto:operations@slaterinvestments.com); or
- using the ‘unsubscribe’ link in emails.

We may ask you to confirm or update your marketing preferences if you ask us to provide further products and services in the future, or if there are changes in the law, regulation, or the structure of our business.

We will always treat your personal data with the utmost respect and never sell or share it with other organisations for marketing purposes.

### ***Who we share your personal information with***

We will share personal information with law enforcement or other public or governmental authorities if required by applicable law.

We will not share your personal information with any other third party unless you specifically request us to do so.

### ***How long your personal information will be kept***

We will hold your personal data for no longer than reasonably necessary to fulfil the purpose for which it was collected. Once those purposes have been completed which shall hold them for no longer than any period required by law.

### ***Where your personal data is held***

Personal data may be held at our offices and those of the law enforcement or other public or governmental authorities as described above (see above: '***Who we share your personal data with***').

Some of these third parties may be based outside the UK. For more information, including on how we safeguard your personal data when this happens as described below (see below: '***Transferring your personal data out of the UK and EEA***').

### **Updating your personal information**

It is important to inform us of any changes in your personal information to ensure the information held is accurate and kept up to date. If you need to do this please contact us immediately either by email, calling us or in writing.

### **Transfer of your information out of the UK and the EEA**

Countries outside the UK have differing data protection laws, some of which may provide lower levels of protection of privacy.

It may sometimes be necessary for us to transfer your personal data to countries outside of UK. In those cases we will comply with applicable UK laws designed to ensure the privacy of your personal data. We may transfer your personal information outside UK and the European Economic Area (EEA).

Under data protection law, we can only transfer your personal data to a country or international organisation outside the UK where:

- the UK government or, where the EU GDPR applies, the European Commission has decided the particular country or international organisations ensures an adequate level of protection of personal data (known as an 'adequacy decision');
- there are appropriate safeguards in place, together with enforceable rights and effective legal remedies for data subjects; or
  - a specific exception applies under data protection law

Where we transfer your personal data outside the UK we do so on the basis of an adequacy regulation or (where this is not available) legally approved standard data protection clauses. In the event that we cannot or choose not to continue to rely on either of those mechanisms at any time we will not transfer your personal data outside the UK unless we can do so on the basis of an alternative mechanism or exception provided by the UK data protection law and reflected in an update to this policy.

If you would like further information about the safeguards we have in place to protect your personal information, please contact [operations@slaterinvestments.com](mailto:operations@slaterinvestments.com).

### **Your rights**

You have a number of important rights free of charge.

In summary, those include rights to:

- fair processing of information and transparency over how we use your personal information;

- access to your personal information and to certain other supplementary information that this Privacy Notice is already designed to address;
- require us to correct any mistakes in your information which we hold;
- require the erasure of personal information concerning you in certain situations;
- receive the personal information concerning you which you have provided to us, in a structured, commonly used and machine-readable format and have the right to transmit those data to a third party in certain situations;
- object at any time to processing of personal information concerning you for direct marketing;
- object to decisions being taken by automated means which produce legal effects concerning you or similarly significantly affect you;
- object in certain other situations to our continued processing of your personal information;
- otherwise restrict our processing of your personal information in certain circumstances.

For further information on each of those rights, including the circumstances in which they apply, please contact us (see '**How to contact us**' below) or see the Guidance from the UK Information Commissioner's Office (ICO) on individuals' rights.

If you would like to exercise any of those rights, please:

- email, call or write to us;
- let us have enough information to identify you, for example, account number, your name, registration details;
- let us have proof of your identity and address (a copy of your driving licence or passport and a recent utility or credit card bill); and
- let us know the information to which your request relates, including any account or reference numbers, if you have them.

Where you have provided consent to us to process your data in a certain way, you also have the right to withdraw that consent.

### **Keeping your personal information secure**

We have appropriate security measures in place to prevent personal information from being accidentally lost, or used or accessed in an unauthorised way. We limit access to your personal information to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

### **IP Addresses and Cookies**

Like most websites, we use cookies. A cookie is a small text file which is placed onto your device (eg computer, smartphone or other electronic device) when you use our website. We use cookies on our website.

We collect information from your computer, including where available your IP address, operating system and browser type, for system administration purposes and to enable us to monitor the effectiveness of this site. This is statistical data about our users' browsing actions and patterns, is anonymised or aggregated and does not identify any individual.

That data will not be subject to the relevant sections of this policy or to data privacy law. That data may be used for statistical analysis and administration, including analysis of trends, tailoring products and services, risk assessment and analysis of costs and charges in relation to our products and product

support services, to compile (non-identifying) demographic data such as which pages of the website are used most frequently, sales, traffic patterns and related site information.

No cookies used by us store personally identifiable data such as: name, address, phone number, email, financial data.

You may refuse to accept cookies by activating the settings on your browser which allows you to refuse or limit the usage cookies. Unless you have adjusted your browser settings so that it will refuse cookies, our system will issue cookies when you arrive at our site.

For further information on our use of cookies, including a detailed list of your information which we and others may collect through cookies, please see below.

For further information on cookies generally, including how to control and manage them, visit the guidance on cookies published by the UK Information Commissioner's Office, [www.aboutcookies.org](http://www.aboutcookies.org) or [www.allaboutcookies.org](http://www.allaboutcookies.org).

### **Consent to use cookies and changing settings**

We will ask for your consent to place cookies or other similar technologies on your device, except where they are essential for us to provide you with a service that you have requested. By using our website you agree that, unless you have set your device's browser to reject them, we can place the types of cookies set out below on your device, and use that data in accordance with this policy.

You can choose whether or not to accept cookies or manage the cookies you wish to allow using the 'Accept all', 'Reject all' or 'Customize' buttons on the cookies banner at the bottom of the page.

### **Our use of cookies**

The table below provides more information about the cookies we use and why:

#### **Performance cookies**

<b>Name</b>	<b>Organisation</b>	<b>Function</b>	<b>Expires</b>
_ga	Google	The _ga cookie is installed by Google Analytics, calculates visitor, session and campaign data and also keeps track of site usage for the site's analytics report. The cookie stores information anonymously and assigns a randomly generated number to recognise unique visitors. By default it is set to expire after 2 years.	After 730 days
_gid	Google	Installed by Google Analytics, _gid cookie stores information on how	After 1 day

		visitors use a website, while also creating an analytics report of the website's performance. Some of the data that are collected include the number of visitors, their source, and the pages they visit anonymously.	
_gat_gtag_UA_nnnnnnnn_n	Google	Set by Google to distinguish users.	When you close your browser window.

### How to turn off all cookies and consequences of doing so

If you do not want to accept any cookies, you may be able to change your browser settings so that cookies (including those which are essential to the services requested) are not accepted. If you do this, please be aware that you may lose some of the functionality of our website.

For further information about cookies and how to disable them please go to the guidance on cookies published by the UK Information Commissioner's Office, [www.aboutcookies.org](http://www.aboutcookies.org) or [www.allaboutcookies.org](http://www.allaboutcookies.org)

### Third Party Links

On occasion we include links to third parties on this website. Where we provide a link, it does not mean that we approve that site's policy towards visitor's privacy. You should review their privacy policy before sending them any personal data.

### Contacts and complaints

We hope that we can resolve any query or concern you raise about our use of your information.

If you have any questions about this Privacy Policy or wish to exercise any of your rights including your marketing preferences please contact us (see below '**How to contact us**'). We hope we will be able to resolve any issues you may have.

You also have the right to lodge a complaint with the Information Commissioner. The Information Commissioner may be contacted at <https://ico.org.uk/make-a-complaint> or telephone: 0303 123 1113.

### Changes to this privacy notice

We will update this policy from time to time. You should regularly return to this page so you can review any changes we make and see details of any new cookies we add. The effective date of this policy will always be shown at the bottom of the page.

### How to contact us

If you wish to contact us, please send an email to [operations@slaterinvestments.com](mailto:operations@slaterinvestments.com), write to: The Operations Department. Slater Investments Limited. Nicholas House, 3 Laurence Pountney Hill, London. EC4R 0EU or call 020 7220 9460.

### Do you need extra help?

If you would like this Policy in a more accessible format (for example audio, large print, braille) please contact us (see above '**How to contact us**'). Please tell us what format you need.

**Slater Investments Limited**

**March 2023**