



# BREWIN DOLPHIN

## *Privacy Notice*

“Brewin Dolphin”, “we”, “us” and “our” means Brewin Dolphin Limited and we are committed to respecting your privacy.

Brewin Dolphin Limited is registered in the UK and its registered address is at 12 Smithfield Street, London, United Kingdom, EC1A 9BD. Its company registration number is 2135876.

### ABOUT THIS PRIVACY NOTICE

For the purposes of data protection law, we are a data controller in respect of your personal data. Brewin Dolphin is responsible for ensuring that it uses your personal data in compliance with data protection law.

This privacy notice applies if you are a client, a prospective client, an intermediary or a client of an intermediary. The privacy notice sets out the basis on which any personal data about you that you provide to us, that we create, or that we obtain about you from other sources, will be processed by us. Please take the time to read and understand this privacy notice.

### PERSONAL DATA THAT WE COLLECT ABOUT YOU

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

- **Information that you provide to us or one of our affiliates.** This includes information about you that you give us by filling in forms or by communicating with us, whether face-to-face, by phone, e-mail or otherwise. This information may include:
  - Name, address, e-mail address and telephone number, financial information, employment history, identification records authentication data, nationality and dependants.
  - Health information that you give to us is considered a special category of personal data under data protection law. We collect this from you whenever you provide it to us over the course of our relationship with you.
- **Information we collect or generate about you.** This may include (by way of a non-exhaustive list):
  - a file with your contact history to be used for enquiry purposes so that we may ensure that you are satisfied with the services which we have provided to you;
  - through our cloud security services, traffic and security reports that include information on the internet usage of the organisation’s computer users (e.g. what websites were visited by each user, any documents downloaded, security incidents, prevention measures taken by the gateway, etc.); and
  - activity data relating to the use of protected documents, such as altering a document’s permissions and information regarding the individual that performed the activity.
- Information we obtain from other sources.

### Cookies

- When you visit Brewin Dolphin Websites, cookies are used to collect technical information about the services that you use, and how you use them.
- For more information on the cookies used by Brewin Dolphin please see our Cookie Policy.

### Anonymized data

- In addition to the categories of personal data described above, Brewin Dolphin will also process further anonymized information and data that is not processed by reference to a specific individual.

### Intermediaries

- We will receive information from agents, dealers, brokers and introducers including your personal details (which may include information about your health), contact details and relevant asset or policy details for the purposes of entering in to and administering your agreement with us.

## USES OF YOUR PERSONAL DATA

Your personal data may be stored and processed by Brewin Dolphin in the following ways and for the following purposes:

- Your data is used to provide financial services to you. The data is used for regulatory purposes to ensure the suitability of financial products and services for you. In some cases, these services are provided by a third party. Your data may also be used for marketing purposes, so that we may tell you about products and services you may be interested in, as well as to invite you to exclusive client events.
- Your health data is used so that we can tailor our services to your individual needs. However, we only process your health data where you have given your consent for us to do so.

We are entitled to use your personal data in these ways because:

- we need to do so in order to perform our contractual obligations with you;
- we have obtained your consent;
- we have legal and regulatory obligations that we have to discharge;
- we may need to in order to establish, exercise or defend our legal rights or for the purpose of legal proceedings; or
- the use of your personal data as described is necessary for our legitimate business interests (or the legitimate interests of one or more of our affiliates), such as:
  - allowing us to effectively and efficiently manage and administer the operation of our business;
  - maintaining compliance with internal policies and procedures;
  - monitoring the use of our copyrighted materials;
  - enabling quick and easy access to information on Brewin Dolphin Services;
  - offering optimal, up-to-date security solutions for mobile devices and IT systems; and
  - obtaining further knowledge of current threats to network security in order to update our security solutions and provide these to the market.

## AUTOMATED DECISION-MAKING AND PROFILING

- We do not use fully automated decision-making in order to execute our business relationship with you;
- We do, however, process your data on a partially automated basis with the aim of evaluating certain characteristics of yours (profiling). We use profiling in the following situations:
  - To provide you with tailored information and advice regarding our products we use internal data analysis. This enables us to target appropriate communications and advertisements at you, including invitations to exclusive client events that we think you may be interested in, as well as recommending products and services that we think might be suitable for you.

## DISCLOSURE OF YOUR INFORMATION TO THIRD PARTIES

We will take steps to ensure that the personal data is accessed only by the personnel of such affiliates that have a need to do so for the purposes described in this notice.

We may also share your personal data outside of Brewin Dolphin and our affiliates:

- with our business partners. For example, this could include our partners who provide you or your company or your organisation with services alongside or related to, those provided by Brewin Dolphin (such as a SIPP provider). personal data will only be transferred to a business partner who is contractually obliged to comply with appropriate data protection obligations and the relevant privacy and confidentiality legislation;
- with third party agents and contractors for the purposes of providing services to us (for example, Brewin Dolphin's accountants, professional advisors, IT and communications providers and debt collectors). These third parties will be subject to appropriate data protection obligations and they will only use your personal data as described in this Privacy Policy;
- if we sell any of our business or assets, in which case we may disclose your personal data to the prospective buyer for due diligence purposes;
- if we are acquired by a third party, in which case personal data held by us about you will be disclosed to the third party buyer;
- to third party agents or contractors (for example, the providers of our electronic data storage services) for the purposes of providing services to us. These third parties will be subject to confidentiality requirements and they will only use your personal data as described in this privacy notice; and
- to the extent required by law, for example if we are under a duty to disclose your personal data in order to comply with any legal obligation, establish, exercise or defend our legal rights.

## TRANSFERS OF PERSONAL DATA OUTSIDE THE EUROPEAN ECONOMIC AREA

The personal data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area (“EEA”). It may also be processed by staff operating outside of the EEA who work for our affiliates or for one of our suppliers.

Where we transfer your personal data outside the EEA, we will ensure that it is protected in a manner that is consistent with how your personal data will be protected by us in the EEA. This can be done in a number of ways, for instance:

- the country that we send the data to might be approved by the European Commission;
- the recipient might have signed up to a contract based on “model contractual clauses” approved by the European Commission, obliging them to protect your personal data; or
- where the recipient is located in the US, it might be a certified member of the EU-US Privacy Shield scheme.

In other circumstances the law may permit us to otherwise transfer your personal data outside the EEA. In all cases, however, we will ensure that any transfer of your personal data is compliant with data protection law.

You can obtain more details of the protection given to your personal data when it is transferred outside the EEA (including a copy of the standard data protection clauses which we have entered into with recipients of your personal data) by contacting us in accordance with the “Contacting us” section below.

## RETENTION OF PERSONAL DATA

How long we hold your personal data for will vary. The retention period will be determined by various criteria including:

- the purpose for which we are using it – we will need to keep the data for as long as is necessary for that purpose; and
- legal obligations – laws or regulation may set a minimum period for which we have to keep your personal data.

## YOUR RIGHTS

You have a number of legal rights in relation to the personal data that we hold about you. These rights include:

- the right to obtain information regarding the processing of your personal data and access to the personal data which we hold about you;
- the right to withdraw your consent to our processing of your personal data at any time. Please note, however, that we may still be entitled to process your personal data if we have another legitimate reason (other than consent) for doing so;
- in some circumstances, the right to receive some personal data in a structured, commonly used and machine-readable format and/or request that we transmit that data to a third party where this is technically feasible. Please note that this right only applies to personal data which you have provided to us;
- the right to request that we rectify your personal data if it is inaccurate or incomplete;
- the right to request that we erase your personal data in certain circumstances. Please note that there may be circumstances where you ask us to erase your personal data but we are legally entitled to retain it;
- the right to object to, and the right to request that we restrict, our processing of your personal data in certain circumstances. Again, there may be circumstances where you object to, or ask us to restrict, our processing of your personal data but we are legally entitled to continue processing your personal data and / or to refuse that request; and
- the right to lodge a complaint with the data protection regulator (details of which are provided below) if you think that any of your rights have been infringed by us.

You can exercise your rights by contacting us using the details set out in the “Contacting us” section below.

You can find out more information about your rights by contacting the Information Commissioner’s Office, or by searching their website at <https://ico.org.uk/>.

## CONTACTING US

If you would like further information on the collection, use, disclosure, transfer or processing of your personal data or the exercise of any of the rights listed above, please address questions, comments and requests to [0.DataProtectionandInformationSecurity@brewin.co.uk](mailto:0.DataProtectionandInformationSecurity@brewin.co.uk)

**W** [brewin.co.uk](http://brewin.co.uk)  
**E** [info@brewin.co.uk](mailto:info@brewin.co.uk)