Privacy Policy

Introduction

Singer Financial Trust are committed to safe guarding your privacy. This privacy policy sets out the basis on which the personal or other data collected from you, or that you provide to us, will be protected by us and how that information will be used.

Our details as a data controller are:

```
Singer Financial Trust
1 King Street
London EC2V 8AU
```

Reception : 0203 713 1516 Direct. : 0203 713 1517 Fax. : 0207 643 4099 Mobile : 07931 90 84 82

Our ICO registration reference is Z5134550

Information we may collect about you

This policy sets out the basis for how we use your personal data. It applies when you –

- Visit our website.
- Register to download a brochure, whitepaper or other document.
- Communicate with us about our products or services.
- Contact us regarding recruitment.
- Communicate with us in the course of us providing our financial services to you.
- Email or telephone us.

The personal data you give to us may include:

- your name and title
- your contact information, including your address, telephone number(s), and email address
- information relating to your location, preferences and / or interests

- your and others' signature(s), National Insurance number(s) and financial details including bank account details
- in certain circumstances, data relating to health (including disabilities) and other 'special category personal data'
- · the details of any enquiry submitted over our website
- any other personal data we collect in the context of our work for our clients or in the course of operating our business
- employment and job application details, e.g. date of birth, employment history, qualifications, vetting information and equality monitoring information.

We may collect information during your visit, including the pages you view, the links you click and other actions taken. We also collect certain information that your web-browser sends to every website you visit, such as your IP address, browser type, access times and referring website addresses. We use this information to analyse user behaviour and measure interest in specific areas and information posted on our site.

How we will use your information

We may use your information for the following purposes:

- to enable us to provide our services to you as a client and to manage our relationship with you;
- to respond to any query or enquiry you may submit to us:
- to complete our contractual obligations to you, as described in our terms of business or client agreement;
- to satisfy our obligation to know our clients and to prevent money laundering and terrorism financing;
- if you have given your consent to do so, to send you any relevant information on our services and events that may be of interest to you;
- to process any job application you have submitted to us;
- to analyse how our website is being used so that we can improve the service;
- to alert you to service changes and updated information;
- for troubleshooting problems, detecting and protecting against error, fraud or other criminal activity; and
- as otherwise set forth in this privacy policy.

Our legal grounds for processing your information

We will rely on the following legal for processing your personal data:

- Performance of, or entry into, a contract. The personal data we are required to collect in order to comply with any professional and regulatory obligations which apply to us must be provided in order for us to perform this contract. We will not be able to act for you without this personal data.
- Where you have provided your consent for to our processing your data for one or more specific purposes;
- We have a legitimate interest in doing so as a financial services provider (and where our legitimate interests are not overridden by your own interests or fundamental rights or freedoms).
- As we will explain at the time we collect your consent, you may withdraw
 it at any time in accordance with the information we provide to you at that
 time.

Sharing your information

We may share your details with carefully selected third parties dependent on the services you have asked us to provide. These may include service providers, support services and organisations that enable us to fulfil our contractual obligations to you and/or our clients in the course of business.

If we share your information with third parties they will process your information as either a data controller or as our data processor and this will depend on the purposes of our sharing your personal data. We may disclose your information to third parties when:

- you specifically ask us to or it is necessary to provide our services to you;
- if we have your consent to pass your information to other companies' products and services which may interest you;
- 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;
- if we are under a duty to disclose your personal data in order to comply with any legal obligation or to protect the rights, property or safety of our website, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

The third parties may include:

product providers;

- our insurers or auditors;
- other professional advisers or third-parties we work with in the course of our business with you;
- · the Financial Conduct Authority, our regulator;
- our data processors who may host internal systems for us such as our email or other business systems;
- any third party you ask us to share your data with.

Our website may, from time to time, contain links to and from the websites of third parties. If you follow a link to any of these websites, please note that these websites 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 websites.

Cookie Policy

We may store information about you in a cookie (a small file that is sent by our web server to your computer), which we can access when you make return visits to our site. Storing cookies is usual practice for any web site that needs to remember what its users' preferences are and we use cookies to keep track of your choices in the Website. If you would like to delete any cookies that are already on your computer, please refer to the instructions for your file management software to locate the file or directory that cookies are stored in. If you would like to stop cookies being stored on your computer in the future, please refer to your browser manufacturer's instructions by clicking "Help" in your browser menu. Further information about deleting or controlling cookies is available at www.aboutcookies.org.

We may collect information when you visit our website such as the pages you have visited, your browser type or the average time you have spent on the site. Please note that when you visit our site, we may also log your IP address, a unique identifier for your computer or other access device. This information is only analysed and used to improve the design or functionality of the service or to alert you to any compatibility issues.

Your Rights

All personal data is held securely under the provisions of the relevant Data Protection Law which includes the General Data Protection Regulation.

You are entitled to ask for a copy of any personal data that we hold about you and to have any inaccuracies in your personal data corrected. You can request that we delete your personal data.

You are also entitled to receive the personal data that you have provided to us in a structured, commonly used and machine-readable format.

You can exercise your rights by contacting us by writing or by phoning on/ to:

Singer Financial Trust 1 King Street London EC2V 8AU

Reception : 0203 713 1516 Direct. : 0203 713 1517 Fax. : 0207 643 4099 Mobile : 07931 90 84 82

You can also contact us by email at:

<u>ifa@singerfinancialtrust.co.uk</u> or by completing our form on our Contact Us page.

If you have a concern or would like to lodge a complaint you may raise your concern with the Information Commissioner's Office (ICO).

You may be eligible for compensation for damages caused if we breach our responsibilities to you.

For information on how to raise your concern with the ICO please see https://ico.org.uk/concerns/.