

INVESTMENT QUORUM PRIVACY POLICY

New and far reaching regulations will change the way we collect data and protect the privacy of our clients, potential clients and those organisations which interact with us. This policy is designed to outline our current approach to ensuring we protect your privacy when dealing with us.

It is therefore essential that you read and understand this privacy and cookie policy (the “Privacy Policy”) together with our Terms and Conditions prior to applying for our services.

Investment Quorum is the trading name of Investment Quorum Limited company No. 4074070 with registered office at 85 Gresham Street, London EC2V 7NQ. This Privacy Policy sets out how Investment Quorum uses and protects any personal information that is collected when you use this website or interact with us as your provider of wealth management services. We are a regulated company and are authorised and regulated by the Financial Conduct Authority (FCA) under the Financial Services and Markets Act 2000 (FSMA) and must also comply with their rules as well as those of the General Data Protection Regulation (GDPR) as promulgated by the Information Commissioner’s Office (ICO).

Our commitment

Investment Quorum is committed to protecting your personal information and other data provided to Investment Quorum via this website. If Investment Quorum requests information from which you could be identified (“personal data”), information of this type will only be used in accordance with this Privacy Policy.

Investment Quorum’s products and services are not designed to appeal to or not available for persons under the age of 18 unless with the assistance of parents, grandparents or guardians. Therefore, Investment Quorum does not knowingly attempt to solicit or receive any information from anyone under the age of 18.

What information does Investment Quorum collect and what does Investment Quorum do with this information?

Investment Quorum may collect the following information about website users:

Name and job title

Contact information including email address

National insurance numbers and identity document numbers

Demographic information such as postcode, preferences and interests

Other information relevant to customer surveys and/or offers you choose to participate in

Technical information including IP address and login details

Investment Quorum, and any third parties which host or maintain this website for us, may need to collect information about you and your computer to allow you to use some services. The information will be collected when you register or log on to the website or when you choose to use an available Investment Quorum service via the website. This includes, but is not limited to, when you fill out forms, transfer any policies into our agency, upload any documentation, send Investment Quorum

any communication by email, fax or post, make an enquiry, complete the Investment Quorum risk profiling questionnaire or any other communication that Investment Quorum receives directly or indirectly from you.

The nature of Investment Quorum's business is such that Investment Quorum may on occasion ask you to provide sensitive personal data as defined in the Data Protection Act 1998. Where Investment Quorum does so, Investment Quorum will request your explicit consent for the use of such sensitive personal data.

We may carry out fraud prevention checks using fraud prevention databases. If false or inaccurate information is provided, and/or fraud is identified, details will be passed to fraud prevention agencies. Law enforcement agencies may access and use this information. We may access and use the information recorded by fraud prevention agencies from other countries.

Investment Quorum, or third parties providing services on Investment Quorum's behalf, may also monitor traffic patterns and usage of the website to help to improve the website design and lay-out.

Any communications made via phone, Skype or the website chat function will also be recorded and stored securely.

In order to carry out your instructions, Investment Quorum may also pre-populate the forms of third party websites with the personal data you have supplied us with. This may be done manually or through secure and encrypted data transfers. It is your responsibility to check that the pre-populated data fields are correct. Investment Quorum bears no responsibility for any problems with any applications to third-party companies that arise from any errors or inaccuracies in pre-populated data fields on application forms which we complete on your behalf.

Fair Processing Notice

GENERAL

Before we provide services to you, we undertake checks for the purposes of preventing fraud and money laundering, and to verify your identity. These checks require us to process personal data about you.

The personal data you have provided, we have collected from you, or we have received from third parties will be used to prevent fraud and money laundering, and to verify your identity.

Details of the personal information that will be processed may include name, address, date of birth, address, contact details, financial information, employment details, device identifiers including IP address and vehicle details.

We, and fraud prevention agencies, may also enable law enforcement agencies to access and use your personal data to detect, investigate and prevent crime.

We process your personal data on the basis that we have a legitimate interest in preventing fraud and money laundering, and to verify identity, in order to protect our business and to comply with laws that apply to us. Such processing is also a contractual requirement of the services you have requested.

Fraud prevention agencies can hold your personal data for different periods of time, and if you are considered to pose a fraud or money laundering risk, your data can be held for up to six years.

AUTOMATED DECISIONS

As part of the processing of your personal data, decisions may be made by automated means. This means we may automatically decide that you pose a fraud or money laundering risk or if our processing reveals your behaviour to be consistent with that of known fraudsters or money launderers; or is inconsistent with your previous submissions; or you appear to have deliberately hidden your true identity. You have rights in relation to automated decision making: if you want to know more please contact us using the details provided.

CONSEQUENCES OF PROCESSING

If we, or a fraud prevention agency, determine that you pose a fraud or money laundering risk, we may refuse to provide the services you have requested, or we may stop providing existing services to you.

A record of any fraud or money laundering risk will be retained by the fraud prevention agencies, and may result in others refusing to provide services, financing or employment to you. If you have any questions about this, please contact us on the details provided.

DATA TRANSFERS

Whenever fraud prevention agencies transfer your personal data outside of the European Economic Area, they impose contractual obligations on the recipients of that data to protect your personal data to the standard required in the European Economic Area. They may also require the recipient to subscribe to 'international frameworks' intended to enable secure data sharing.

YOUR RIGHTS

Your personal data is protected by legal rights, which include your rights to object to our processing of your personal data; request that your personal data is erased or corrected; request access to your personal data.

For more information or to exercise your data protection rights please, please contact us using the contact details provided- info@investmentquorum.com

You also have a right to complain to the Information Commissioner's Office which regulates the processing of personal data.

If you are unhappy about how your personal data has been used please refer to our complaints policy. You also have a right to complain to the Information Commissioner's Office, which regulates the processing of personal data.

Offers, promotions and competitions and opting out

Investment Quorum may use your personal data to notify you of news about Investment Quorum, changes to the website, special events or new services that Investment Quorum thinks may be of interest to you. If, at any time, you would rather not receive such information, please contact Investment Quorum in writing, either by post or email (to info@investmentquorum.com) to let us know.

If you ask not to receive such news, Investment Quorum will still need to keep your personal data so that you can continue to use the website and so that Investment Quorum can deal with the

administration and security of the website. Investment Quorum will still contact you by email or post for anything necessary for the administration of your financial planning and investment management affairs and to comply with any legal or other important conditions; however, Investment Quorum will not then email you or contact you by telephone, fax or post for promotional purposes without your subsequent consent.

From time-to-time Investment Quorum may request information from users for the purposes of the efficient management of your finances placed with us. Participation in these requests for information requests is completely voluntary and you therefore can choose whether or not to disclose this information for this purpose but you need to be aware that not replying could be detrimental to our delivery of efficient, timely and accurate activity on your financial affairs.

Sharing of information with third parties

Investment Quorum will not disclose your personal data to third parties other than as described in this section unless it is otherwise legally permitted or required to do so.

Investment Quorum may need to pass your information to third party service providers which maintain, administer or develop the website on our behalf and the information will only be provided for such limited purposes. In addition, Investment Quorum may provide aggregate statistics about its customers, sales, traffic patterns and related website information to reputable third-parties, but these statistics will include no personally identifiable information.

We may disclose your personal data to third parties for promotional purposes.

Investment Quorum reserves the right to access and disclose personal data or information to comply with applicable laws and lawful government requests, to operate its systems properly, or to protect itself or its users.

Your consent

You acknowledge and agree that by registering or using this website and any services offered via this website, certain information relating to you will be captured electronically (including sensitive personal data where required, but this will be subject to you giving your explicit consent in such cases) or otherwise and transmitted to Investment Quorum and / or, to third parties which maintain, administer or develop the website, as set out in the section above.

You acknowledge and agree that Investment Quorum may send your information outside of the European Economic Area for processing or use in accordance with this Privacy Policy. Where Investment Quorum does so, Investment Quorum will take all steps reasonably necessary to ensure the security of your personal information and in accordance with this Privacy Policy.

By using this website, you expressly agree to the collection and use of your information for the purposes set out in this Privacy Policy.

How does Investment Quorum protect user information?

As required by the Data Protection Act 1998, Investment Quorum follows strict security procedures in the storage and disclosure of information which you have provided via this website, to prevent unauthorised access.

Information collected will be stored on a dedicated and secure server with at least 256-bit encryption.

Unfortunately, the security of information transmitted via the Internet cannot be guaranteed. Although Investment Quorum will take reasonable and practicable steps to ensure the security of your personal data once we have received it, we cannot guarantee the security of information transmitted to our website; any transmission is at your own risk. Once Investment Quorum has received your personal data, we will use strict procedures and security measures addressed at preventing unauthorised access and loss. Investment Quorum will store your personal data as described above.

Where Investment Quorum has given you (or where you have chosen) a password which enables you to access certain parts of the website such as platform access to either Seven Investment Management or Transact, you are responsible for keeping this password confidential and should not share your password with anyone.

What are 'cookies' and how does Investment Quorum use them?

A cookie is a small text file which is transferred to and stored on your computer, portable device or mobile when you visit a website. This website uses cookies which help Investment Quorum to improve this website for our users by enabling us to tailor operations to your needs and preferences for a better browsing experience. More information about the purposes for which cookies and other web technologies, such as web beacons, are used is provided below.

Two types of cookies are used on this website: session cookies and persistent cookies. Session cookies are temporary files that only remain in the cookie file of your internet browser until you leave our website, and are used to remember your selections within that session. Persistent cookies remain even after you leave our website and the internet browser is closed and are used to identify you when you return to the website and/or to remember specific information about your preferences.

Investment Quorum also uses cookies to track advertising campaigns from banner advertisements and opt-in emails. Investment Quorum may use third-party providers to help us determine which of our advertisements are most likely to be of interest to you. These providers may use online behavioural information, such as how you navigate the internet, to provide relevant advertisements to you.

Investment Quorum may also allow some of these companies to use web pixels. Web pixels may be used to collect and store information about visits to our website, such as which pages you viewed and how long you spent on the website, as well as the specific advertisement that you clicked to visit our site. No personally identifiable information is stored on these cookies or web pixels. The

information reported to Moneyfarm is aggregated and anonymous. Investment Quorum uses this information to understand, for example, the effectiveness of our advertising and marketing

Overall, cookies help Investment Quorum 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 Investment Quorum access to or control over your computer.

To learn more about cookies, please visit www.allaboutcookies.org or www.youronlinechoices.eu.

The following table outlines the main types of cookies used by the website, with examples, and describes what they are used for:

Example and whether Persistent or Session

Cookie Type Operation and Purpose

Strictly necessary cookies

These are required for technical and operational reasons and enable users to navigate and use services on this website. For example, cookies that enable you to sign into the secure areas of this website to make use of our investment services.

Performance cookies

They allow the recording of the number of visitors to a website and how they navigate it. The information collected by these cookies is aggregated and cannot be used to identify an individual's identity.

Investment Quorum uses this information to continually improve the website for its users and are, for example, used to limit the rate of collection of data to ensure users have a good service and are not restricted by high traffic on the website (session)

Functionality cookies

To improve the functionality of the website making it easier to use. They differentiate one user from another by providing a unique user number that is recognised on your return to the website. This allows Investment Quorum to personalise the content for you and tailor this website to your needs.

You may choose to block cookies by modifying your browser settings. However if you choose to block all cookies, you may be unable to make full use of our website.

BY USING THE WEBSITE WITHOUT BLOCKING COOKIES, YOU ARE DEEMED TO CONSENT TO THESE USES OF COOKIES AND WEB PIXELS, INCLUDING FOR ADVERTISING PURPOSES.

Changes to the Privacy Policy

Investment Quorum may change this Privacy Policy from time to time by updating this page. You are advised to check this page from time to time to ensure that you are happy with any changes. This policy is effective from 25th March 2015.

Links to other websites

The Investment Quorum website may contain links to other third party websites of interest such as platforms, financial news providers and other links contained within articles and resources. However, once you leave this website, be aware that Investment Quorum does not have any control

over such websites. Therefore, Investment Quorum cannot be responsible for the protection and privacy of any information which you provide whilst visiting such websites and such websites are not governed by this Privacy Policy. You should exercise caution and look at the privacy policy applicable to the website in question.

Controlling your personal information

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

Whenever you are asked to fill in a form on the website, look for the box that you can click to indicate that you do not want the information to be used by anybody for direct marketing purposes. If you have previously indicated that Investment Quorum may use your personal information for direct marketing purposes, you may change your mind at any time by writing to or emailing us at info@investmentquorum.com but please be aware that changes may take up to 30 days to be effective.

Investment Quorum will not sell, distribute or lease your personal information to third parties unless we have your permission, or are required or permitted by law to do so. Investment Quorum 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.

The Data Protection Act 1998 gives you the right to access information held about you. Your right of access can be exercised in accordance with this Act. Any access request may be subject to a fee of £10 to meet Investment Quorum's costs in providing you with details of the information we hold about you. Please write to us at: info@investmentquorum.com if you would like to request access to your personal information.

Date of last update: 14th May 2018