

Website Privacy Notice

Date of last update: June 2019

Whitley Asset Management takes the privacy and security of your personal information very seriously. This Privacy Notice explains how Whitley Asset Management collects and uses any personal data you disclose when you use or interact with the Whitley Asset Management (WAM) website, and your rights in relation to that personal data.

‘Personal data’ is information that identifies individuals directly or from which individuals can be identified indirectly. We are the ‘data controller’ in relation to your personal data that we hold, because we control the storage and use of that personal data.

Information we may collect via the website

We may collect and process the following data about you:

- Information you give us: You may give us information about you by submitting the online enquiry form. The information you give us may include your name, address, email address and other personal information.

Purposes for which Whitley Asset Management processes personal data

We process your personal data for the following purposes:

- For responding to your enquiry. Any personal information provided by you to WAM through this website will be used solely for the purpose of providing you with the information you have requested. This information is not gathered by WAM without the user’s active permission and participation.

Legal basis for processing the data

We are allowed to use personal information only if we have a proper reason to do so. The law says we must have one or more of these reasons:

- when you consent to it
- to fulfil a contract we have with you
- when it is our legal duty
- when it is in our legitimate interest
- when it is necessary for us to perform a task in the public interest for our official functions
- when it is a vital interest to protect someone’s life

The table below provides further detail on the lawful grounds and, where the lawful ground is our legitimate interest, what the legitimate interests are which apply to the purposes for which we process your personal data. A legitimate interest is when we have a business or commercial reason to use your information. But even then, it must not unfairly go against what is right and best for you.

For responding to your enquiry	
Lawful grounds for processing	Legitimate interests
Your consent	

Cookies	
Lawful grounds for processing	Legitimate interests
It is in our legitimate interest	Essential cookies: Ensuring our site functions properly and providing you with the online services you have requested.

Consent as a legal basis

Where we rely on your consent to process your personal data, you are able to withdraw such consent at any time. To withdraw your consent, please contact the firm's Compliance Officer, Louise Rettie. If you withdraw your consent, we may not be able to respond to your enquiry. If this is so, we will tell you.

Your rights

You have a number of rights over your data, subject to certain criteria being met. These are:

- The right to be informed about the collection and use of your personal data
- The right of access to the data we hold about you and supplementary information
- The right to rectification which enables you to have inaccurate personal data rectified, or completed if it is incomplete
- The right to erasure of the personal data that we hold about you
- The right to restrict processing allowing you to request the restriction or suppression of your personal data
- The right to data portability allowing you to obtain and reuse your personal data for your own purposes across different services
- The right to object to the processing of your data on the basis of our legitimate interests, for direct marketing purposes and/or for research and statistics

If you wish to exercise any of these rights please contact Louise Rettie who will provide you with further information.

Disclosure of your information

We will never sell, trade, or rent your personal information to others however, we might pass your personal data to third parties on whose services we rely in order to be able to provide services to you. These include:

- our service providers, such as the custodians or auditors we use, for the performance of any contract we enter into with them or you
- governmental or judicial bodies or agencies to comply with our legal and regulatory obligations
- fraud prevention agencies, other companies and organisations to prevent or detect financial and other crime
- data storage and software providers that assist us in the improvement and optimisation of our IT

Where we store your personal data

We store your data on our secure servers in the United Kingdom. However, your data may be transferred to, stored at, and processed at a destination inside or outside the European

Economic Area by our service providers. By submitting your personal data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Notice.

How long we keep your personal information

We may keep your data for up to 7 years for one of these reasons:

- to maintain records showing who we have contacted and when
- to respond to any questions or complaints
- to show that we treated you fairly
- to maintain records according to rules that apply to us

We may keep your data for longer than 7 years if we cannot delete it for legal, regulatory or technical reasons. We may also keep it for research or statistical purposes and to maintain records showing who we have contacted and when and where consent (if required) has been granted or refused. If we do, we will make sure that your privacy is protected and only use it for those purposes.

Cookies

We use cookies across our website to enhance your user experience.

‘Essential’ cookies are automatically placed on your computer to ensure that the content on the site is presented in the most efficient way for you and the computer you are using and to enable you to participate in interactive features of the site.

Most browsers allow you to block all cookies, including essential cookies. Please note, however, that if you block all cookies, parts of our website and its functionality may not work or display properly.

You can delete existing cookies from your browser by clearing your browsing data and ensuring that the option to delete cookies is selected.

Calls to Whitley Asset Management

When you call Whitley Asset Management we will collect the Calling Line Identification information and retain a copy of the telephone call for training, security and compliance purposes. We may also use the information to help improve our efficiency and effectiveness. Recorded calls are retained for 7 years, but calls saved for compliance purposes may be retained as long as the client relationship or longer (see ‘How long we keep your personal information’ above).

Links to other websites

Links to third party websites are provided for your information and convenience. However, you should be aware that the content and software of these websites has been compiled and issued by third parties and has not been reviewed by WAM. As such, WAM cannot be responsible for the accuracy of any information or opinion contained within any such website.

Access to information

You have the right to request a copy of the personal information we hold about you. If you would like a copy of some or all of this information you may contact us by telephone on 020

7221 2145 or you may write to us at: Whitley Asset Management Ltd, 116 Princedale Road, London W11 4NH. If any of the information we hold is inaccurate, you can ask us to make any necessary amendments.

Complaints

If you think that your data has been misused or that we haven't kept it secure please contact us. If you are unhappy with our response or need any advice you can contact the Information Commissioner's Office (ICO).

ICO helpline: 0303 123 1113

Changes to our Privacy Notice

We reserve the right to revise or supplement this Privacy Notice from time to time. You can determine when this Privacy Notice was last revised by checking the "Date of last update" at the top of this Privacy Notice.