

PRIVACY POLICY // MAY 2018

1. Who we are: Seven Investment Management LLP (“**7IM**”) is what is known as the ‘controller’ of the personal data we collect and use.

In relation to the 7IM SIPP, 7IM Investment and Retirement Solutions Limited is the operator of the 7IM SIPP (the “**SIPP Operator**”), and a controller of personal information gathered and used in connection with the operation of your 7IM SIPP account. 7IM Trustees Limited (the “**Trustee**”) provides trustee services in relation to the 7IM SIPP, and will process your personal data in connection with the trustee services on the instructions of the SIPP Operator or otherwise as required by law.

References in this Privacy Policy to “we”, “us” or “our” are to the above named entities.

Our Chief Operating Officer can be contacted by calling +44 (0)20 7760 8777, by emailing information@7im.co.uk or by writing to the Chief Operating Officer, Seven Investment Management LLP, 55 Bishopsgate, London, EC2N 3AS.

2. The purpose of this Privacy Policy: This Privacy Policy contains important information regarding how we will collect and use your personal data. It should be read, where relevant, in conjunction with any of our other applicable terms and conditions. In particular, if you are a direct individual or institutional investor in any of the 7IM UK or Dublin funds the 7IM Funds Privacy Notice <https://www.7im.co.uk/7IM-Funds-Privacy-Notice> will also apply to you.

This Privacy Policy will apply to our collection and use of your personal data unless we expressly state to the contrary elsewhere.

3. The types of personal data we collect and use: The personal data which we collect and use may include things such as your personal details (name, email address, phone number, etc.), information which is relevant to us providing any services to you (such as proof of identity/address documents and bank account details) and any details which you submit to us (for instance, when you sign up to receive marketing materials from us).

Where you provide us with personal data relating to others, such as family members, including (but not limited to) when using our app, 7IMagine, or when applying for our services, you confirm that you have their consent or are otherwise entitled to provide this information to us and for us to use it in the ways described in this Privacy Policy.

4. How we use your personal data: We use your personal data:

- i. to process your application for our products and/or services;
- ii. to operate and administer your 7IM account (once opened);
- iii. to provide services in relation to your 7IM account under our agreement with you;
- iv. in relation to the 7IM SIPP, to operate your 7IM SIPP once your application for membership is accepted, including the processing of any contributions made by you, transferring any existing pensions to your 7IM SIPP, and the payment of retirement benefits under the 7IM SIPP;
- v. for the purposes of conducting credit/identity checks and financial crime and anti-money laundering enquiries or assessments;
- vi. to comply with our regulatory authorisations and permissions;
- vii. for reporting to taxation and regulatory authorities and exchanges;
- viii. for crime prevention and detection;
- ix. to respond to requests for information from you;
- x. for providing your data to your financial adviser (if you have appointed one), accountants, tax advisers and other professional advisers of yours;
- xi. to provide you with information about our services (marketing);
- xii. for statistical and research purposes;
- xiii. so you can use, and we can help enhance the use of, our online services, such as our 7IMagine app; and
- xiv. any other instances where we are required to do so or where it is reasonable in the circumstances.

5. Our legal basis for using your personal data: We only use your personal data where such use is permitted by laws that protect your privacy rights. We will process your personal data in the ways described below:

- i. we have your consent (if consent is needed);
- ii. we need to use the information to perform a contract with you;
- iii. we need to use the information to comply with our legal obligations; or
- iv. it is fair to use the personal data either in our interests or someone else’s interests, where there is no disadvantage to you. This can include where it is in our interests to market additional products or services to you and we think they may be of interest to you.

6. Your rights: You have the right to access, correct, transfer to another service provider, in some cases delete, restrict and object to how we process your personal data. You also have a right to complain to the data protection regulator, the Information Commissioner (the “**ICO**”). Details of how to make a complaint to the ICO are contained on their website: www.ico.org.uk/. If you would like any further information about, or to exercise any of your rights, in the first instance you should direct such request to us by email at information@7im.co.uk.

For clients of our Jersey branch, you also have a right to complain to Jersey’s Office of the Information Commissioner (the “**Jersey OIC**”). To contact the Jersey OIC, please visit the Jersey OIC website (<https://oicjersey.org/>) for instructions.

7. Our products and services: We may need some personal data before we can provide our products and services to you, for example to allow us to check your identity. In some cases we won’t be able to provide products and services to you if we don’t have all the personal data we need.

8. Sharing of your personal data: We may share your personal data:

- i. with any custodian appointed on your behalf in relation to your 7IM account;
- ii. in relation to the 7IM SIPP, between the SIPP Operator, the Trustee and 7IM as required to operate your 7IM SIPP, and with any third party appointed to provide back office administration support;
- iii. where your 7IM account is held jointly with another person, we may disclose account information (which may include your personal data) to the other account holder(s) unless you tell us otherwise;
- iv. with your financial adviser and their delegates or appointed service providers;
- v. in respect of a 7IM account opened for investments within a wrapper product, we will provide the provider of the wrapper product (as well as you as the underlying beneficiary) with account information (which may include your personal data);
- vi. with investment product providers of investments purchased for your 7IM account;
- vii. with payment services providers;
- viii. with any other members of our corporate group;
- ix. with our professional advisers (including accountants and lawyers) who are subject to confidentiality obligations;
- x. as part of an asset sale of our assets;
- xi. if required by law or requested by a regulatory or tax authority or exchange having control or jurisdiction over you or us, including (without limitation) under requirements deriving from the U.S Foreign Account Tax Compliance Act or Common Reporting Standard;

- xii. to investigate or prevent fraud, market abuse, tax evasion or other illegal activity (including disclosing confidential information to third parties who are directly involved in any such investigation);
- xiii. where otherwise required in connection with us providing our services and carrying out our legal obligations under our agreement with you;
- xiv. where it is in the public interest to disclose such information; or
- xv. at your request or with your consent.

9. Transferring personal data outside the UK: You acknowledge that your information may be sent internationally, including to countries outside of the European Economic Area. We will always take steps to ensure that any such transfer complies with applicable data protection laws.

10. Keeping personal data: We keep your personal data securely for as long as we need to for the purposes we have set out above and, in any event, in accordance with our retention policy. If you would like more information on our retention policy please contact our Chief Operating Officer.

11. Your consent: Sometimes we need your consent to use your personal data. We won’t always ask for consent to use personal data - for example if we need it to meet regulatory requirements or to perform a contract with you. Where you have given us consent, you have the right to withdraw it at any time by contacting our Chief Operating Officer using the details above.

12. Automated Decision Making: We may use your personal data in automated processes to make decisions about you. We might also use automated processes to create a profile of you. We do this to help ensure decisions are made accurately, fairly and efficiently.

13. Changes to this Privacy Policy: We may need to make changes to this Privacy Policy from time to time and shall do so by amending this page. You should check this page regularly to take notice of any changes we make as they are binding on you.

14. Cookies: We have a separate policy in relation to our use of cookies available on our website <https://www.7im.co.uk/7IM-Cookie-Policy>

For more information call 0207 760 8777 or visit www.7im.co.uk