

PRIVACY POLICY

Seven Investment Management LLP (“**7IM**”) takes your privacy very seriously. This Privacy Policy tells you, in broad terms, how we use personal information that we collect from your use of the domain <http://www.7im.co.uk> and any sub-domains of the Website (together the “**Website**”) and our mobile application, 7IMagine.

This Privacy Policy applies to your use of the Website and 7IMagine. Please read this Privacy Policy carefully together with any terms and conditions and disclaimers that apply to your use of the Website or 7IMagine (together the “**Terms and Conditions**”).

By proceeding with access to the Website or 7IMagine you are deemed to have accepted the Terms and Conditions. If you do not agree with the Terms and Conditions as they apply to the Website or 7IMagine, then please refrain from accessing or using the Website or 7IMagine.

Any personal information you supply to 7IM via the Website or 7IMagine (and by other means) will be treated in accordance with the Data Protection Act 1998 and other legislation intended to protect your personal information and privacy (see **Your Personal Data and Your Legal Rights** section below).

We may revise the Privacy Policy at any time by amending this page. You are expected to check this page from time to time to take notice of any changes we make, as they are binding on you.

Where you provide 7IM with personal information relating to others via the Website or 7IMagine (for example, your dependants or joint portfolio holders for the purpose of opening and administering your 7IM portfolio), 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 Policy.

The Website or 7IMagine may have links to selected third party websites. We also recommend that you check the terms and conditions and privacy statements on all external websites before using such websites (see **Third Party Links** section below).

Cookies

What are cookies?

A cookie is a small text file which may be placed onto your computer or device when you access the Website. We use cookies to help the Website work more efficiently, as well as improve your experience of using it.

Please note that none of the cookies which we place on your computer or device can identify you personally or use any of your personal data.

By selecting ‘Private Client’ or ‘Intermediary’ on the Website’s homepage you agree to our use of cookies as detailed in this policy.

What cookies do you use and why?

The table below details the cookies we use and why we use them:

Cookie	Why we use the cookie
Accepted	This cookie is placed on your computer or device when you agree to our use of cookies (as per above) and allows us to remember that you have accepted the terms of this policy. This means that we don’t have to display the cookies banner to you every time you visit the Website. This cookie will remain on your computer or device for 24 months.
Audience type	This cookie is placed on your computer or device to allow us to remember whether you selected ‘Private Client’ or ‘Intermediary’ on the Website’s homepage. This means that you don’t have to click on the option that applies to you each time you visit the Website and allows you to go directly to the content that is relevant for you. This cookie will remain on your computer or device for 24 months.

Google analytics	These cookies are used to collect information about how visitors use our Website. We use the information they provide to compile reports and to help us improve the Website. These cookies collect information such as the number of visitors to the Website, where the visitors have come from and the pages on our Website which they visit. These cookies will remain on your computer or device for 3 months.
Sitecore analytics	These cookies are used to collect information about how visitors use our site. We use the information they provide to compile reports and to help us improve the Website. They also allow us to identify the type of computer or device the Website is being accessed from so that the correct version of the Website can be displayed. These cookies will remain on your computer or device for 24 months.
AddThis	We use a tool supplied by AddThis to allow the users of our Website to easily link to a variety of social media platforms. When you click on a button linking to such a social media platform, AddThis may place their own and other third party cookies on your computer or device. 7IM does not control these cookies and you should read AddThis's cookies policy for more information.

How do I turn off cookies?

If you do not want to accept cookies, you can change your browser settings so that cookies are not accepted. If you do this, please be aware that you may lose some of the functionality of the Website. For further information about cookies and how to disable them please go to the Information Commissioner's webpage on cookies at <https://ico.org.uk/for-the-public/online/cookies/> or visit <https://www.youronlinechoices.eu>.

What Information Do We Collect and How?

The personal information 7IM collects through the Website or 7IMagine may include details such as your name, e-mail address, postal address, telephone number and date of birth and bank or credit card details.

Personal information is collected by 7IM on the Website or 7IMagine:

- via enquiry, registration, claim forms, feedback forms and forums;
- when you purchase any of our products or services;
- when you fill out a survey, or vote in a poll on this website;
- through 7IMagine, including any of the services or content provided to you through or on it;
- through feedback forms and web analytics tags; and
- when you provide your details to us either online or offline.

We may also use cookies or similar technologies to collect website usage information. For further information, please see the section on Cookies above. In addition we may also collect IP addresses via a web analytics package.

What Will the Information We Collect Be Used For?

We may use the information we collect to send you information about our products and services and any other services described in our Website or 7IMagine. We may also use the information we collect for statistical data for research purposes and to assist us in improving our processes, products and services. We will also use information collected to safe-guard against fraud and money laundering. We are required to report details of some suspicious activities to relevant authorities.

Security of Personal Data

7IM will take all reasonable steps to ensure that any personal data that you provide via the Website or 7IMagine is kept secure. Although we endeavour to protect your personal data, because of the nature of the Internet, we cannot guarantee the security of your data transmitted to the Website or 7IMagine and any inward transmission of data is carried out at your own risk.

Your Personal Data and Your Legal Rights

Any personal information you supply to 7IM via the Website, 7IMagine or via any third party website will be treated in accordance with the Data Protection Act 1998 and the Privacy and Electronic Communications Regulations 2003.

7IM is committed to delivering the rights that the Data Protection Act 1998 and Privacy and Electronic Communications Regulations provides to individuals. Amongst these are:

- the right to object to your personal information being used for direct marketing. We will give you the ability to object to this, and where required we will ensure we obtain your consent before undertaking marketing; and
- the right to request a copy of the personal information 7IM holds about you. To do this, please write to us with full details of what you require enclosing a cheque or postal order for £10 payable to Seven Investment Management LLP, at the following address:

Data Protection Officer
Seven Investment Management
55 Bishopsgate
London
EC2N 3AS

In the first instance, you should direct any such request to us by email at address:
information@7im.co.uk.

Errors and Omissions

If you believe that there may be an error in any of the information that you have submitted via the Website or 7IMagine, please email: information@7im.co.uk. We will review your records as soon as possible.

Third Party Links

The Website or 7IMagine may contain links to other websites which are outside our control and are not covered by this Privacy Policy. If you access other websites using the links provided, the operators of these websites may collect information from you which will be used by them in accordance with their privacy policy, which may differ from ours.

Consent

We do not intentionally collect any information via the Website or 7IMagine from children under 16 years of age, and unless the information was collected in connection with a 7IM account, shall delete the details of such users when a parent or guardian notifies us that any details have been obtained from their child.

Complaints

If you have a complaint in relation to the Website or 7IMagine, please contact us. Our contact details are:

Seven Investment Management
55 Bishopsgate
London
EC2N 3AS
Telephone: 020 7760 8777
Email: information@7im.co.uk