

PRIVACY POLICY

London Stone Securities takes the privacy and security of your personal information very seriously, and we are committed to protecting and respecting your privacy.

Our Privacy Policy explains which personal information we collect from you, how we store it and use it. It also covers how we treat information you give to us, and information we take from third parties. It contains important information about your rights. We hope you read the Policy carefully, so you understand and feel comfortable with how we treat your personal information. By engaging with us in the ways set out in this Policy, you confirm that you have read and understood the entirety of this Policy, as it applies to you.

We recognise that there are risks to you with us processing your personal information, such as financial loss if there is a security breach. This is why we take every effort to ensure that all potential risks are minimised.

1. Who we are

This Privacy Policy is provided on behalf of London Stone Securities. London Stone Securities Limited is registered in England and Wales, No: 6464964. Authorised and regulated by the Financial Conduct Authority, No: 479827.

2. Collecting your information

We collect and process your information in these circumstances:

1. When you give us your personal information by phone, email, and via our websites, in writing or otherwise. This includes but isn't limited to information you give us when you open an account, request quotations, register for email alerts, request literature, sign up for newsletters or enter a competition, promotion or survey. The information you give us can include your name, address, email address and other contact information. It can also include your financial and debit card information and other personal details such as your National Insurance number and health information
2. When you visit our premises: Because of our security policies and procedures in our office premises, we will collect images of visitors using CCTV footage.
3. When you visit our website: When you visit our websites we automatically collect information which includes: the Internet Protocol (IP) address used to connect your computer to the internet, your login information, your geographic location, your browser and browser plug-in type and version, and your operating system and platform. We also collect information

about your visit, including the source of your visit, and the full click path and mouse movement through our sites (including date and time). This includes the services you viewed, searches you made on our sites, page response times, download errors, length of visits to certain pages, page interaction information (such as page scrolling, mouse clicks, mouse movements and keyed text), and how you navigated away from any page and any phone number you use to call our Helpdesk. We collect this type of information using a website recording service.

4. When we email you: From time to time when you open an email we have sent you, we automatically collect information including your geographic location, browser type and version, the device, and the operating system and platform you're using. We also collect information about your email consumption, including the full click path from within and on to our sites (including date and time), and whether you opened, deleted, forwarded, printed or unsubscribed from the email, and how long the email was open.

5. When we receive your information from third party service providers: We may receive information about you from third party service providers such as credit reference agencies, payment service providers, or analytics providers. If you have a workplace pension with us, we also receive personal information from your employer.

If we don't receive all the personal information we've requested from you, then we won't be able to provide all of our products and services to you.

3. How we use your information

We use your personal information in the following ways:

- To provide you with any services and/or information you request from us. This also includes carrying out any obligations specified in any contracts between us
- To get quotations or arrange investments or insurance for you with regulated entities
- If you contribute to a child's Junior ISA, we'll give your name to the parent/guardian who is responsible for the account
- If you apply for an account with us for someone else, acting with power of attorney, we'll use the information you give us about the applicant (including information about the applicant's mental health) and your role as the attorney to provide the product or service you request
- To comply with our legal and regulatory obligations, co-operate with the court service, our regulators and law enforcement agencies and to prevent and detect crime
- If we learn of your insolvency or bankruptcy (or any insolvency proceedings), we'll transfer your details to the Official Receiver or appointed insolvency practitioner(s)

- To check instructions, you've given us or to resolve disputes including to establish, exercise or defend our legal rights
- To improve the quality of our services and to train our staff
- To let you know about any changes we make to our service
- To process any job application you submit, or that an agency submits for you
- To tell you (by mail, email, telephone or otherwise) about products and services we think you could be interested in, based on our products you already have or have shown an interest in. You can opt out of this communication at any time
- To confirm your identity and address, which includes using automated decisions when we carry out financial crime checks
- To request your feedback on a product or service via a third party we've chosen (we'll only share your name and email address)
- Gathering data for analysis and research, and to provide management information or other services internally and to third parties
- To administer our sites and for internal operations, including troubleshooting, data analysis, load management, testing, research, statistical and survey purposes
- To improve our sites to make sure that our content is as effective as we can for you and for your computer
- So we can provide services such as the 'most popular' information on our site
- So we can show you and others targeted advertisements when you browse the internet
- So you can choose to participate in interactive features of our sites
- As part of our efforts to keep our sites safe and secure and to prevent and detect money laundering, financial crime and other crime
- To monitor, record, store and use any telephone, email or other communication with you. We'll update your records with any new information you or a third party give us, and we'll add it to any information we already have
- When you call our main contact phone number, 0203 697 1700, we'll collect the Calling Line Identification information and keep a copy of the call for training and security purposes. We'll also use your information to help improve our efficiency and effectiveness

- To deal with any enquiries or issues you have about how we collect, store and use your information, or any requests made by you for a copy of the information we hold about you
 - For internal corporate reporting, business administration, ensuring adequate insurance coverage for our business, ensuring the security of company facilities, research and development, and to identify and implement business efficiencies
-

4. Information security

We take the security of your personal data very seriously, and we use appropriate technologies and procedures to protect your personal information.

We keep our data security policies and procedures up to widely accepted international standards. In addition, we review our policies regularly and update them whenever needed to protect you, and to meet our business needs, changes in technology, and regulatory requirements.

Here are examples of the ways we protect your data:

1. We have appropriate technical and organisational measures in place to protect you against accidental loss and unauthorised access, use, destruction or disclosure of your data.
2. We have a business continuity and disaster recovery plan that is designed to help us offer our services and protect our people and assets no matter what happens.
3. We place appropriate restrictions on access to personal information.
4. We implement measures and controls, including monitoring and physical measures, to store and transfer data securely.
5. We complete data protection impact assessments in accordance with legal requirements and our business policies.
6. We provide data security training for our employees.
7. We use a stringent approach to vendor risk management.

The internet is an open medium and we can't guarantee that any information you send to us by email or via our sites won't be intercepted or tampered with. Any transmission is at your own risk.

5. Our legal basis for using your information

Our legal basis for collecting and using your personal information depends on the exact type of information and how and when we collect it. However, we'll normally only collect personal information from you, your employer, or another third party where one of the following applies:

1. we need your personal information to perform a contract with you (for example if you are a client);
2. it's in our legitimate interests or the legitimate interests of others (for example, to ensure the security of our website).

If we rely on our (or another person's) legitimate interests for using your personal information, we will undertake a balancing test to ensure that our (or the other person's) legitimate interests are not outweighed by your personal interests or fundamental rights and freedoms which require protection.

3. we have your consent (for example you have ticked a box on a form):

We may use your special categories of data (such as health information) where you have provided your consent (which you may withdraw at any time after giving it, as described below). We may also process your personal information in some cases for marketing purposes on the basis of your consent (which you may withdraw at any time after giving it, as described below). If we rely on your consent for us to use your personal information in a particular way, but you later change your mind, you may withdraw your consent by contacting us and we will stop doing so.

4. we have a legal obligation to collect your personal information (such as for H.M.R.C. reporting).

When we collect personal information to comply with a legal requirement or to enter into a contract with you, we'll let you know at that time. We'll also tell you if providing your personal information is mandatory or not, and what the consequences would be if you don't provide it. Similarly, if we collect and use your personal information for our legitimate interests (or those of any third party), which are not set out above we'll tell you at that time what those legitimate interests are.

6. How and when we share your information

We will share your information with the following third parties: partners, suppliers, custodians, trustees, sub-contractors including but not limited to payment service providers,

advertising networks, our professional advisors such as lawyers, auditors, insurers and information, service and software providers that help us improve and optimise our sites.

Our reasons for sharing your information with these service providers include:

1. To uphold our part of any contract we enter into with them or you.
2. To enforce or apply our statutory disclosures or any other agreement or to protect the rights, property or safety of our sites, our users or others.
3. In agreement with advertisers and advertising networks that require your information so they can select and serve adverts about our services to you and others. We will only share your personal information with third party advertisers in order to help them provide services on our behalf.
4. With our workplace pensions, or our authorised broker service, when your employer, or their appointed third party, asks us for information about your trades or for the value of your holdings to allow them to comply with their regulatory obligations where you have given us your explicit permission. If you hold a workplace pension with us, we'll also provide your employer with information about the contributions paid into and fees deducted from your accounts, as well as details of your membership of the relevant scheme.

We will also disclose your information to third parties:

1. where it is in our legitimate interests to do so to run, grow and develop our business:
2. if we sell or buy any business or assets, we may disclose your personal information to the prospective seller or buyer of such business or assets;
3. if substantially all of our assets are acquired by a third party, in which case personal information held by us will be one of the transferred assets;
4. if we are under a duty to disclose or share your personal information: in order to comply with any legal obligation, any lawful request from government, judicial bodies or agencies to make sure we comply with our legal and regulatory obligations; with law enforcement officials; and as may be required to meet national security or law enforcement requirements or prevent illegal activity; to work with fraud prevention agencies, other companies and organisations to prevent or detect financial and other crime.
5. in order to enforce or apply our terms and conditions or any other agreement or to respond to any claims, to protect our rights or the rights of a third party, to protect the safety of any person or to prevent any illegal activity; or
6. to protect our rights, property, or safety and that of our staff, our customers or other persons. This may include exchanging personal information with other organisations for the purposes of fraud protection and credit risk reduction.

When sharing your information with third parties, we make sure the appropriate safeguards are in place to protect your personal information.

We will never sell, trade, or rent your personal information to anyone.

We may also disclose and use anonymised, aggregated reporting and statistics about users of our website or our services for the purpose of internal reporting or reporting to our group or other third parties, and for our marketing and promotion purposes. None of these anonymised, aggregated reports or statistics will enable our users to be personally identified.

7. How long we store your personal information

We keep the personal information we collect from you, your employer, and other third parties, where we have an ongoing legitimate business need to do so (for example, to provide you with a service you have requested or to comply with applicable legal, tax or accounting requirements).

We keep all records for a minimum of five years from when you stop being a client with us, or from when your records were provided to us (whichever is longer). We can use it to respond to any questions or complaints, to maintain records according to rules that apply to us, or for fighting financial crime, including fraud.

In certain circumstances, we will keep your information for longer than ten years – for example if we can't delete it for technical reasons or for compliance with our legal and regulatory obligations. If your personal information is kept for longer than ten years for research and statistical purposes it will be anonymised.

When we have no ongoing legitimate business need to hold your personal information, we will either delete or anonymise it. If we can't do this (for example, because your personal information is stored in backup archives), we'll securely store your personal information, only use it for a purpose we've already communicated to you, and isolate it from any further processing until archives are deleted.

Where we process information on behalf of other organisations, we apply the same retention periods as above.

8. Marketing

We may collect and use your personal information for undertaking marketing by email, telephone and post.

We may send you certain direct marketing communications (including electronic marketing communications to existing customers) if it is in our legitimate interests to do so for marketing and business development purposes.

However, we will always obtain your consent to direct marketing communications where we are required to do so by law.

You have the right to ask us not to process your personal information for marketing purposes. You can do this by contacting us by post or email using the details in the “Contact London Stone Securities” section. You can also unsubscribe from emails by following the unsubscribe instructions included in every email.

9. Your rights

1. Right of access: You have the right of access to any personal information we hold about you. You can ask us for a copy of your personal information; confirmation whether your personal information is being used by us; details about how and why it is being used; and details of what safeguards are in place if we transfer your information outside of the European Economic Area.

2. Right of to update your information: If any of the information we hold is inaccurate, you can ask us to make any necessary amendments.

3. Complaints: If you have any complaints or concerns about our handling of your personal information please do get in touch with us and we will do our best to resolve these. You can contact us on 02036971700 or you write to us at our registered address.

In accordance with Article 77 of the General Data Protection Regulation, you have the right to complain about our collection and use of your personal information to the Information Commissioner’s Office or the data protection authority in the country where you usually live or work, or where the alleged infringement of the General Data Protection Regulation has taken place. For more information, please contact the local data protection authority.

You may also seek a remedy through local courts if you believe your rights have been breached.

In certain specific circumstances you also have following further rights:

1. Right of deletion: You have a right to ask us to delete any personal information which we are holding about you.

2. Right to restrict use of your information: You have a right to ask us to restrict the way that we process your personal information.

3. Right to data portability: You have a right to ask us to provide your personal information to a third-party provider of services.

4. Right to object. You have a right to ask us to consider any valid objections which you have to our use of your personal information where we process your personal information on the basis of our or another person's legitimate interest.

5. Right to stop marketing: You have a right to ask us to stop using your personal information for direct-marketing purposes.

We will consider all such requests and provide our response within a reasonable period (and in any event within one month of your request, unless we tell you we are entitled to a longer period required by applicable law). Please note, however, that certain personal information may be exempt from such requests in certain circumstances, for example if we need to keep using the information to comply with our own legal obligations or to establish, exercise or defend legal claims. If an exception applies, we will tell you this when responding to your request. We may request you provide us with information necessary to confirm your identity before responding to any request you make.

Please contact us if you would like further information. If you would like to exercise any of your rights, you can contact us on 02036971700 or write to us at our registered address.

10. Using our websites

Our website is: www.londonstonesecurities.co.uk

If you visit our website, you acknowledge that the practices described in this Policy apply. Our sites can, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please remember that they have their own policies and that we do not accept any responsibility or liability for their policies or how they collect and use your information.

Our sites may include functionality to enable sharing via third party social media applications, such as the Facebook Share button and Twitter widget. These social media applications may collect and use information regarding your use of our sites (see details on 'Social Sharing' cookies in our Cookie Policy). Any personal information that you provide via such social media applications may be collected and used by that social media application and such interactions are governed by the privacy policies of the companies that provide the application. We do not have control over, or responsibility for, those companies or their use of your information.

11. Cookies

Our sites use cookies to distinguish you from other users. This helps us to provide you with a good experience when you browse our sites and also allows us to improve our sites. For detailed information on the cookies we use and the purposes for which we use them see our cookie policy.

When we send you an email, we may track whether you have opened that email and whether you have clicked any links it may contain. This helps us measure the performance of our email campaigns. We do this by including single pixel gifs, also called web beacons, in emails we send. Web beacons allow us to collect information about when you open the email, your IP address, your browser or email client type, and other similar details.

12. Updating this Privacy Policy

We reserve the right to revise or supplement this Privacy Notice from time to time. You should bookmark and periodically review this page to ensure that you are familiar with the most current version of this Privacy Notice and so you are aware of what information we collect, how we use it and under what circumstances we disclose it. You can determine when this Privacy Notice was last revised by checking the “Date of last update” legend at the top of this Privacy Notice.

13. Contacting us

If you have any queries regarding privacy issues, you can email us, write to us at London Stone Securities, 1 Royal Exchange, London, EC3V 3DG or call us on 0203 697 1700.