

SARANAC

PARTNERS

Privacy Notice

Privacy Notice

"Saranac Partners", "we", "us" and "our" means Saranac Partners Limited. We are a London-based wealth manager incorporated in the UK, regulated by the Financial Conduct Authority and registered as a data controller with the Information Commissioner's Office.

For the purposes of data protection law, we are a controller in respect of your personal data. Saranac Partners is committed to protecting your privacy and ensuring you are fully aware of the information we may hold on you and how that information might be used in the course of providing services to you.

This Privacy Notice explains how we collect, use, share and protect your personal data when we provide services to you, or when you are an individual representative of one of our clients. It also explains your rights and how you can contact us or the Information Commissioner's Office if you have a concern.

This Privacy Notice applies to you if you are:

- (a) an individual client of Saranac; or
- (b) an individual representative of a client of Saranac.

This Privacy Notice (together with our Terms of Business) explains how we collect and safeguard your personal data. Please take the time to read and understand it.

Personal data we collect or generate about you

(a) Information that you provide to us

We collect personal data as part of our due diligence process on both existing and prospective clients. The process includes the collection of physical forms of identity and address verification such as copies of passports, driving licence or other legal documents from you.

You may provide additional information by corresponding with us via phone, email, or other means including interactions with our website or our dedicated client portal where we have granted you access.

The information you provide may include your (or your client's) name, address, email address, phone number, financial information, holdings, transactions and data on real assets or other relevant personal details you choose to share with us. We will avoid requesting or holding special categories of personal data (racial or ethnic origin; political opinions; religious beliefs; trade union membership; physical or mental health or condition; sexual life) or personal data relating to criminal convictions or offences except where necessary to comply with our regulatory obligations.

By sharing these details with us, you confirm that you are entitled to share personal data, and where you are acting in a third-party capacity that you have received the necessary authorisations to share information on behalf of the underlying client.

(b) Information we collect or generate about you

We may monitor or record phone calls, video calls, emails and chat applications in case we need to check we have carried out your instructions correctly, to resolve queries or issues, for regulatory purposes, to help improve our quality of service, and to help detect or prevent fraud or other crimes. Conversations may also be monitored or reviewed for staff training purposes.

(c) Information we gather from other sources

In the process of gathering information on you as a prospective client or providing services to you, we will engage with a range of third-party providers such as credit and fraud prevention agencies in order to gather relevant data about you and your circumstances, as well as gathering intelligence from publicly available sources. These agencies may also give us additional details and information from the Electoral Register in order to aid identity verification.

If you have authorised a third party to contact us, or authorised us to contact a third party on your behalf, you acknowledge we may receive and store additional information they provide to us. When dealing with any third party in relation to your details we will always undertake a thorough security check prior to any discussion.

Retention period

How long we hold your personal data will vary. The retention period will be determined by various criteria including:

- the purpose for which we are using it - we will need to keep the data for as long as is necessary for that purpose; and
- legal obligations - laws or regulation may set a minimum period for which we have to keep your personal data.

How we use your information

We will continually review and assess the quality and quantity of personal data we hold, and observe your rights under applicable privacy and data protection laws. We use your personal data to:

- provide our services and manage our relationship with you.
- carry out client on-boarding, due diligence, identity checks and ongoing monitoring.
- communicate with you and respond to your requests.
- meet our legal, regulatory and professional obligations, including those that apply to FCA-regulated firms.
- manage our records, systems and business operations.
- detect, investigate and prevent fraud, financial crime and other unlawful activity.
- improve our services, systems and website.

We may also use your data where we have a legitimate interest, provided that interest does not override your rights and freedoms. Where we rely on consent, we will make that clear and you may withdraw consent at any time, where the law allows.

You may be able to exercise your right to prevent such processing by checking certain boxes on the forms we use to collect your data. You may also be able to exercise this right at any time by contacting us.

We are entitled to use your personal data in these ways because:

- we need to process your personal data in order to enter into a contract with you;
- we have legal and regulatory obligations that we have to discharge;
- we may need to in order to establish, exercise or defend our legal rights or for the purpose of legal proceedings; or

-
- the use of your personal data as described is necessary for our legitimate business interests (or the legitimate interests of one or more of our affiliates), such as maintaining our client records and communicating with our clients in relation to their investments.

Our legal bases

We process personal data on one or more of the following legal bases:

- to perform our contract with you or take steps before entering into a contract.
- to comply with our legal and regulatory obligations.
- for our legitimate interests, including running our business, keeping records, protecting our systems and communicating with clients.
- where necessary to establish, exercise or defend legal claims.
- where you have given consent and we are relying on consent.

When we share your data

We may share your personal data with:

- our employees, partners and other companies in our group where they need access to perform their duties.
- service providers and processors such as IT, cloud, archive, payment, compliance, legal, audit and professional advisers.
- custodians, brokers, banks and other third parties involved in delivering our services.
- regulators, law enforcement agencies, courts and other authorities where the law requires or allows us to do so.
- parties involved in a corporate transaction, such as a sale or acquisition of the business or assets.
- our auditors, advisers and our regulator, the Financial Conduct Authority (FCA), in the course of their normal duties.

Where we share data with third parties, we require them to keep it confidential and to use it only for the purpose we specify. We will take steps to ensure that personal data is accessed only by employees or third parties who have a need to do so for the purposes described in this notice.

Transfers of your personal data outside the UK

We may transfer your personal data outside the UK and, where relevant, the European Economic Area (EEA) if that is necessary for the services we provide or for our business operations. When we do so, we will put in place appropriate safeguards required by UK data protection law, such as:

- an adequacy regulation made by the UK Government; or
- the UK International Data Transfer Agreement or other approved transfer mechanism, obliging the recipient to protect your personal data.

In all cases, we will ensure that any transfer of your personal data is compliant with data protection law. You can obtain more details of the protection given to your personal data when it is transferred outside the UK by contacting us using the details below.

Cookies and website data

Our website uses cookies and similar technologies to help the site work properly, improve performance and understand how visitors use it. Where required, we will ask for your consent before placing non-essential cookies. For full details of the cookies we use, please refer to our Cookie Policy.

AI use

We will not use any personal information you give to Saranac Partners to train, fine-tune or otherwise teach any AI models, unless we have told you about that use in advance and have a lawful basis to do so. We will only use personal data in AI-supported tools where that use is necessary to deliver a service, improve security, or meet legal or regulatory obligations, and we will apply appropriate safeguards.

Your rights

You have a number of legal rights in relation to the personal data that we hold about you. These rights include:

(a) Right of access

You have the right to obtain information regarding the processing of your personal data and access to the personal data which we hold about you.

(b) Right to rectification

If you believe the data we hold is inaccurate or incomplete, you are entitled to have this rectified.

(c) Right to erasure

You have the right to request that we erase your personal data in certain circumstances. Please note that there may be circumstances where you ask us to erase your personal data but we are legally entitled to retain it.

(d) Restriction on and objection to processing

You have the right to object to, and the right to request that we restrict, our processing of your personal data in certain circumstances. Again, there may be circumstances where you object to, or ask us to restrict, our processing of your personal data but we are legally entitled to continue processing your personal data and/or to refuse that request.

(e) Right to data portability

In some circumstances, you have the right to receive some personal data in a structured, commonly used and machine-readable format and/or request that we transmit those data to a third party where this is technically feasible. Please note that this right only applies to personal data which you have provided to us.

(f) Right to withdraw consent

Where we rely on consent as our legal basis for processing, you may withdraw consent at any time. Withdrawal of consent does not affect the lawfulness of processing carried out before withdrawal.

(g) Complaints

If you believe that we have processed your data in a way that does not comply with UK data protection law, you have the right to complain directly to the Information Commissioner's Office (ICO). See the ICO's website at www.ico.org.uk or telephone 0303 123 1113. Alternatively, you can contact our Data Protection Officer using the details below.

We will not always be able to act on every request, because some rights are limited by law and by our regulatory obligations.

Changes to this notice

Any future changes to our Privacy Notice will be posted to the relevant pages on our website and, where appropriate, notified to you by email. We may change the content or services found on our site at any time without notice, and consequently our Privacy Notice may change at any time in the future.

Contact details

Questions, comments and requests regarding this Privacy Notice are welcomed and should be addressed to the Data Protection Officer:

- Email: compliance@saranacpartners.com
- Telephone: 0207 509 5700