

YOUR INFORMATION AND PRIVACY

PRIVACY NOTICE

The privacy of your personal information is very important to us. This Privacy Notice explains the types of information Thomas Miller Investment Limited, Thomas Miller Investment (Isle of Man) Limited (collectively 'Thomas Miller Investment') may collect, what we do with it, and why we need that information.

In order to provide our clients with advice, investment management or related services, Thomas Miller Investment needs to collect personal information. We will control and process your personal information in accordance with the applicable data protection laws and will ensure that personal data is provided with appropriate protection.

1. What personal information do we collect?

We collect and process personal information that may include:

- our clients' personal details (e.g. name, address, date of birth, nationality);
- the personal details of any individuals authorised to act on behalf of our clients (e.g. attorneys);
- where we provide services to a trust, the personal details of the settlor, trustees, beneficiaries and any other individuals who have control over the trust;
- where we provide services to a company or partnership, the personal details of those individuals who own, control or otherwise act for the company or partnership;
- personal details of family members or other people who are financially dependent on our clients;
- information about our clients' health, where this may have a bearing on our advice or may be needed to arrange insurance policies;
- contact details for our clients and their other professional advisers (e.g. telephone numbers and e-mail address);
- information regarding our clients' financial circumstances, needs and priorities;
- details of the investments and financial products that our clients' hold;
- information about our clients' willingness and capacity to take financial risk;
- information about our clients' knowledge and experience of different types of financial products;
- information about the use of Thomas Miller Investment's website e.g. via cookies.

2. How we collect your personal information?

We may collect personal information:

- when we meet with you in person;
- when we speak to you by telephone;
- when you correspond with us by letter or e-mail;
- when you fill in forms and questionnaires;
- when you visit our website.

We may also collect personal information from third parties. For example, we may;

- ask product providers to share information about the investments and financial products you hold;

- search electronic databases (e.g. Company registers, the electoral roll, credit references databases);
- obtain personal information from your other professional advisers.

3. Why do we need your personal information and how do we use it?

We will only collect and use personal information where it is fair and lawful to do so and where:

- it is necessary for the performance of our contract to provide you with advice, investment management or related services, or we are taking steps to enter into such a contract with you; or
- it is necessary for us to meet our legal or regulatory obligations e.g. to perform checks to help us to fight financial crimes such as money laundering and fraud; or
- you have consented to us sharing information with your other professional advisers e.g. providing information about your investments to your accountant to assist in the preparation of your tax returns; or
- you have consented to receiving information about our products and services and those provided by other Thomas Miller companies; or
- it is in Thomas Miller Investment's legitimate interest e.g. to send you non-promotion communications or to review, improve or develop the services we offer.

In situations where Thomas Miller Investment relies on your consent to perform processing, we will stop such processing if you decide to withdraw your consent. To withdraw your consent, simply contact your Portfolio Manager. Withdrawing consent cannot be back-dated so it has no effect on processing already performed during the period of consent.

If you do not wish us to collect and use your personal information, it may mean that we will be unable to communicate with you or provide our services.

4. Who do we share your personal information with?

For the reasons set out in Section 3, we may share personal information with third parties including:

- Other Thomas Miller companies;
- Product providers or brokers e.g. to enter into transactions, or apply for financial products on behalf of our clients;
- Service providers e.g. to arrange for a third party custodian to hold our clients' assets;
- Our client's other professional advisers;
- Identity checking, regulatory intelligence and credit reference agencies that help us meet our obligations under the Money Laundering Regulations and Financial Sanctions Regimes;
- Law enforcement agencies where the law requires us to report any knowledge or suspicion of money laundering or terrorist financing;
- Regulators e.g. the Financial Conduct Authority (FCA) and the Information Commissioner's Office (ICO) in the UK, or the Financial Services Authority (FSA) and Information Commissioner in the Isle of Man;
- An Ombudsman where a complaint against Thomas Miller Investment has been referred to an Ombudsman;
- Tax authorities e.g. to claim tax relief on Individual Savings Accounts (ISAs);
- IT companies and other suppliers and service providers that support us in the delivery of our services e.g. we may use specialist third party software to: manage information about our clients, their investments and transactions; to help us understand our clients' appetite for taking investment risk; or to model their lifetime cash flows.

Whenever we share personal information, we will do so in line with our obligations to keep your information safe and secure.

We will not sell personal information to third parties for marketing purposes.

5. Where is your personal information processed?

Most of Thomas Miller Investment's processing of your information takes place in the United Kingdom, elsewhere in the European Economic Area (EEA) or in the Isle of Man, where the collection and use of personal data is governed by the General Data Protection Regulation (GDPR) or, in the case of the Isle of Man, equivalent data protection law.

However, some of your information may be transferred to other Thomas Miller companies or third parties we work with in countries, such as Australia, where the local data protection law does not provide an equivalent level of protection.

Should we need to transfer personal information to either another Thomas Miller company or a third party in a country that is not subject to the GDPR or equivalent data protection laws, we will take reasonable measures to safeguard your personal data in a manner that complies with the GDPR.

6. How long do we keep your personal information for?

We may retain your personal information after your relationship with us has ended, where this is necessary for us to fulfil our legal or regulatory obligations. The length of time we keep your personal information for will vary depending on the obligations we need to meet. In some cases (e.g. where we have provided advice about a pension transfer) we may be required to keep your information indefinitely. Retaining your information also helps us to answer any future queries you may have.

7. Your Rights

Individuals have the following rights in respect of their personal data:

- **Right to be informed.**

You have the right to be informed about the personal information we collect, how we use it, who we share it with and how long we keep it for. If you have any questions which are not addressed in this Privacy Notice, please contact your Consultant or Portfolio Manager.

- **Right of access**

You can obtain a copy of some or all of your personal data by contacting your Consultant or Portfolio Manager or writing to:

Thomas Miller Investment
90 Fenchurch Street
London
EC3M 4ST

Thomas Miller Investment
Level 2 Samuel Harris House
5-11 St Georges Street
Douglas
Isle of Man
IM1 1AJ

- **Right to rectification**

If the information we hold about you is inaccurate or incomplete you can have this rectified by contacting your Consultant or Portfolio Manager.

- **Right to erasure**

You can ask for your personal information to be deleted if there is not a compelling reason for us to continue to hold it.

- **Right to restrict processing**

You can ask us to stop using your personal information in certain circumstances (e.g. where the accuracy of the data is contested). We will continue to hold your personal information but only to ensure we don't use it in a way that you have objected to.

- **Right to data portability**

In certain circumstances, you can ask us to transfer your personal information to you or another company in a structured, commonly used electronic format.

- **Right to object**

You have the right to object to us using your data for direct marketing purposes.

8. What to do if you are unhappy with how your personal data is processed?

You have a right to lodge a complaint with the supervisory authority for data protection:

UK: Information Commissioners Office

Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF
Tel: 030 3123 1113

Isle of Man: Information Commissioner

PO Box 69
Douglas
Isle of Man
IM99 1EQ
Tel: 01624 693260

9. Data Protection Officer

Thomas Miller has a Data Protection Officer who is responsible for monitoring compliance with the General Data Protection Regulation and other data protection law. His contact details are:

David Smith

Data Protection Officer
90 Fenchurch Street
London
EC3M 4ST
T: +44 (0)207 204 2351
E: david.smith@thomasmiller.com