

PRIVACY NOTICE

Redington Limited (**Redington**) is committed to protecting and respecting your privacy.

Under data protection laws, Redington is the data controller in relation to your personal information. This means we are responsible for deciding what information to collect about you and how it is used.

This privacy policy aims to give you information on how Redington collects and processes your personal data through your use of this website and/or in our professional interactions with you.

Please note that Redington does not need to collect, process or store personal information in order to provide its services offering (we only process our client's contact details – please see further information below).

A. In which circumstances does Redington collect personal information?

We may collect the following information about you:

- **People who use our services or contact us with an enquiry.** We will collect information you submit via our website or when you contact us, for example your name, contact details, details about the service you're interested in or your enquiry.
- **Clients, prospective clients and related persons.** Redington may collect information about the identity of clients and prospective clients and (where relevant) shareholders, beneficial owners, management, directors, officers and trustees and other related persons for verification and anti-money laundering purposes. Such information will usually be collected from you or publicly available sources or both.
- **Website visitors.** We use Google Analytics and Click Dimensions to collect certain information about people who visit our website. Please note this information will not be used to identify you unless you submit your contact details via the website, where we may then connect your prior activity on our website with your personal information.

Redington does not collect special categories of personal information (also known as "sensitive personal data", which includes information about health, racial or ethnic origin, political opinions, religious or philosophical beliefs and sexual life) without your agreement. Please do not send us this kind of information, should you do so we will, as soon as reasonably practicable, either return the information or irretrievably delete it.

We will always try to keep the amount of personal information we collect to the minimum needed.

Our website and marketing emails may use cookies and other analytical technologies to help us improve your experience – please read our [cookies policy](#) to find out more.

If you visit one of our offices, we will ask you to complete the visitors' book, which includes your name and details about your organisation (if applicable) and your visit. Please note that CCTV operates in some

locations to assist with the prevention and detection of crime. CCTV images are normally deleted after 30 days.

B. How we may use personal information

Redington may use your personal information for the following purposes:

- Website administration and update. We may use information we collect to help present our website in the most effective manner for you and monitor how our websites are used, in order to improve them.
- Providing our services or responding to your enquiries.
- Direct marketing and business development.

C. What is Redington's lawful basis for processing?

In general, Redington would process personal information only where processing is necessary. In such cases, the lawful bases for processing personal information are typically Consent, Contract, Legal Obligation and/or Legitimate Interests, for the following reasons:

- in order to provide you with the information or services that you've requested, or
- in order to respond to your enquiry, or
- for our legitimate business interests, or in order to comply with the law.

Please note, you have the right to object to how we process your personal information, or ask us to restrict processing. If you object to or ask us to restrict the processing of your personal information, this won't affect the lawfulness of the processing we've already carried out.

Please see the section on "Your rights" at section G for more details.

D. Sharing your personal information with others

Redington may need to share your personal information with others.

We will only do this for the purposes explained in this privacy notice and Redington will take steps to ensure that your information is kept secure and confidential and only used for the agreed purposes.

We may share your personal information with the following:

- any member of our group companies, for the purposes of providing information or services and developing our business relationship with you,
- our service partners, so that they can contact you about the service you're interested in,
- our service providers, e.g. our IT support and security contractors, marketing agencies and professional advisers,
- your organisation, in connection with any services we provide to them
- regulators, including but not limited to, the Financial Conduct Authority, the Information Commissioner's Office, government bodies or the courts, where we are under a legal obligation to do so, or to protect our rights or property, or the safety of our people, clients or others, so that we can meet our legal obligations.



Some of the above may be located outside the UK, where data protection laws are different, in which case, we will ensure that we comply with data protection laws when making any transfers outside the UK (for example, by signing appropriate contracts) to make sure your personal information is protected. Please contact us if you would like more details about transfers outside the UK.

E. How we protect your personal information

We are an ISO27001 certified firm which means that we have an Information Security Management System that enables the continued accessibility, confidentiality and integrity of information as well as legal compliance. ISO27001 certification is essential for protecting your most vital assets. Being ISO27001 certified is a testament to the fact that Redington prioritises data security and employs up to date technologies and systems to protect your personal information from unauthorised disclosure or damage or misuse.

Redington provides its staff with regular training on information security and data protection matters, on at least an annual basis.

We regularly review all our systems, policies and technologies to ensure that these continue to work effectively to protect your personal information.

F. How long we keep your personal information

We will only keep your personal information for as long as we are using it and as is necessary for the purposes explained in this notice. When we no longer need said information, we will delete it permanently, in accordance with the timings, as set out in our Data Retention Policy.

We may in certain circumstances need to hold your personal information for longer, for example in relation to a legal dispute or because of regulatory requirements.

G. Your rights

You have several rights under data protection laws. These are:

- to request access to your personal information,
- to request that your personal information is corrected if it is out of date, inaccurate or incomplete,
- to request that your personal information is deleted or removed from our records and systems,
- to make a complaint to the Information Commissioner's Office.

You also have the right:

- to withdraw your consent to the processing of your personal information (where we need your consent to process your personal information),
- to object to or restrict the processing of your personal information (where we don't need your consent to process your personal information),
- to obtain an electronic file of your personal information or have it transferred to another data controller in limited circumstances.



H. How do I exercise my rights?

If you would like to make a request to access or correct your personal information, or to exercise any of your other rights, you can contact us at any time using the details set out under "Contacting Us" below (section I).

We will respond to your request within one month from the date we receive it.

Please note that some of your rights are restricted and apply only in certain circumstances. For example, we may refuse to delete your personal information whilst we need it for a valid purpose, including to defend any potential legal claims. We will set out in our response our reasons if we are unable to meet your request.

To find out how to make a complaint to the Information Commissioner's Office, see Contacting the Information Commissioner's Office (section J).

I. Contacting us

You can email: compliance-ISDP@redington.co.uk. You can also write to us at: Head of Legal & Compliance, Redington Limited, Floor 6, 1 Angel Court, London, EC2R 7HJ.

J. Contacting the Information Commissioner's Office

The Information Commissioner's Office (ICO) is the UK's independent body set up to uphold information rights. You can find out more about the ICO on its [website](#).

The ICO can be contacted on 0303 123 1113, by using the email form on the ICO's website, or by writing to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF

K. Changes to this privacy notice

This privacy notice is current as of 24 May 2021. We may make changes from time to time and you should regularly check for updates.

