

Privacy Notice

Speirs & Jeffrey take the security of your personal information very seriously and only use the information you have given us for the purpose of providing the service you have requested from us. In preparation for the new General Data Protection Regulation (GDPR) which will take effect on 25th May 2018, we are taking this opportunity to keep you informed about how we use your personal data.

We may collect and hold the following information

- Your full name, address, date of birth, national insurance number and contact information
- Banking details, including account numbers and sort codes
- Certified copies of passport, driving licence, utility bills
- Information relevant to your financial circumstances, your knowledge and experience of financial services, your investment objectives and attitude to risk, to ensure we provide a service suitable to you. We do not request information specific to your health. If you provide this information to us we will only retain this information where it is relevant to your financial circumstances.

How we use your information

To fulfil our contractual obligations to you

- Information in relation to your knowledge and experience of financial services, your investment objectives and attitude to risk will be used to ensure that we manage your portfolio or advise you in a manner which is suitable to your individual circumstances. Please note that we are unable to provide our service unless we have sufficient information from you to make an adequate assessment.
- To improve and enhance our service or carry out research into future products or services.

To fulfil our legal and regulatory obligations

- To confirm your identity to meet the requirements of anti-money laundering and fraud prevention legislation.
- To facilitate compliance monitoring, auditing and regulatory and financial reporting.

Who we may share your information with

- Companies providing services to Speirs & Jeffrey, for example administrative systems to report transactions to our regulator. The use of personal data by service providers is strictly limited to facilitating the services which they provide and cannot be outsourced to any other third party without our permission.
- We may share your information with credit reference agencies when verifying your identity.
- We may share your information with our regulator the Financial Conduct Authority (FCA), HM Revenue & Customs and any other official bodies who have the legal or regulatory authority to request such information.

- We may pass on copies of verification of identity and address documents that we have obtained from you to third parties such as unit trust managers who are required by law or regulation to verify identity.
- Where you have appointed an Independent Advisor or other third party to act on your behalf information relevant to the provision of service will be shared with them.
- We will not pass on your personal data to any external company for marketing or promotional purposes.

How we keep your information secure

We maintain robust systems and controls to protect the accuracy and safety of your personal information. These include but are not limited to;

- Verification of your Personal Data
- Data Protection and Information Security Policies
- Staff training
- Periodic risk assessments
- Regular reviews of our service providers

We will not transfer your data to a country which is not subject to the GDPR. Any service provider which processes data on our behalf requires our consent to do so. At present no service provider acting on behalf of Speirs & Jeffrey shares our client data with a country not subject to the GDPR.

We are required to retain records in accordance with regulatory record keeping obligations set out by our regulator the FCA. We will retain your information in accordance with these obligations.

Marketing

- We will not pass on or sell your personal information to any third party for marketing or promotional purposes.
- We do not use your information to market other products and services although if it is identified during the course of our arrangements with you that another product or service is more suited to your financial circumstances we will highlight this to you. If we were to carry out any marketing or promotional activity in the future, we would ask for your consent prior to doing so.

Access to your personal information

You have the right to request a copy of the personal data we hold about you. We will respond to your request within one month free of charge. To obtain a copy please email brian.gray@speirsjeffrey.co.uk, or write to;

Brian Gray
Speirs & Jeffrey Limited
George House
50 George Square
Glasgow
G2 1EH

Complaints



Speirs&Jeffrey

Stockbrokers and
Investment Managers
Since 1906



S&J

If you have a complaint regarding the handling of your personal data, this can be raised either directly with your Investment Manager or addressed to the contact details noted above.

Speirs & Jeffrey are registered with the Information Commissioners Office (ICO) as a Data Controller. Further information regarding the General Data Protection Regulation is available via the ICOs website <https://ico.org.uk/>