

## Privacy Policy

### Overview

Please read this Privacy Policy carefully. It applies to you when you visit [killik.com](http://killik.com), [MyKillik.com](http://MyKillik.com) and [client.killik.com](http://client.killik.com) (our sites), use our mobile applications (apps), telephone our branches or open and operate a Killik & Co account. It sets out how we use and protect any information that you give us.

This Privacy Policy should be read together with our [Cookie Policy](#) and Acceptable Use Policy and, if you have signed up to a Killik & Co account, our Terms & Conditions.

We take your privacy very seriously and are committed to ensuring that your privacy is protected. Whenever we ask you to provide us with information about you, be assured that it will only be used in accordance with this Privacy Policy. We do not share data with other organisations unless the law permits us to do so. We do not sell individuals' information.

For the purpose of this Privacy Policy and the General Data Protection Regulation (GDPR), Killik & Co (we and us) of 46 Grosvenor Street, London W1K 3HN is a 'data controller'. We are registered with the Information Commissioner under registration number Z5711970. Our Data Protection Officer can be contacted at: [compliance@killik.com](mailto:compliance@killik.com).

### What we Collect

#### Information you give us

If you express an interest in us and our services, we may ask you for basic contact information such as your name, email address, telephone number, postal address. We may ask you some questions about your circumstances and the nature of your enquiry, to improve our response. We may also survey visitors of our website or individual pages for the purpose of research to understand more about their needs and use of the site to improve user experience.

When you apply for an account with us we shall ask you for information that will include: your name; contact information including email address, mobile phone number, and address; National Insurance Number; bank account details; information about your financial situation including income, expenditure and spending patterns; and copies of personal identification documents (such as your passport or driving licence).

Before you submit any information, we will notify you as to why we are asking for it and it is up to you whether or not

you provide it. The majority of the information is necessary for us to be able to provide our services and/or fulfil our legal obligations and we won't be able to open or maintain an account for you if you choose not to provide it.

#### Information we Collect About you

We collect information from you about the computers, phones or other devices you use where you install or access our sites or apps. We may use this information to help us provide consistent experience across your devices. Here are some examples of the information that we collect:

- Device attributes such as the operating system, hardware version and geographic location based on your internet service provider
- Connection information such as the name of your mobile operator or internet service provider, browser type, language and time zone
- Behaviour such as viewing a specific page, opening a statement or downloading a research note
- Information about what websites or social media platforms you found us on, how you navigated to us, as well as information those sites hold about you and the interactions you complete on our site
- Information that allows us to recognise you as a returning user or client, who has access to one of our online account logins, associated to a different device or browsing session associated to your same IP address.

When you telephone us, calls are recorded and your phone number will be searchable within our call recording system. Correspondence by letter or email will be stored in our prospect/customer database.

#### Uses made of the Information

We must have a good reason, known as a "lawful basis" to use your information. The table on [page 3](#) explains more about the type of information we collect, how we use it and why, and the lawful basis for doing so.

Where the stated lawful basis for processing your data is "our legitimate interests," this may be for the purpose of:

- Keeping in contact with you if you have expressed an interest in our services
- Marketing other services to current clients and sharing other relevant content or better browsing experience of our website

- Marketing services to people who look or behave similar to our existing clients
- Prevention of fraud and financial crime
- Ensuring network and information security
- Inter-group transfers
- Monitoring our services for regulatory compliance, customer satisfaction and complaints and future business strategy.

See also Appendix 1 - Cookie Policy.

### Disclosure of your Information

#### **You Agree that we have the Right to Share your Personal Information with:**

**GROUP COMPANIES** | Killik & Co LLP, Killik & Co Trustees Limited, Killik Intelligent Savings Limited.

**DATA PROCESSORS & BUSINESS PARTNERS** | Carefully selected third parties necessary in providing the services, e.g. custodian, print services, ID verification services etc.

**ANALYTICS SERVICES** | Services that assist with optimisation of our sites and helping us to understand how visitors use/navigate our sites.

**THIRD PARTY PLATFORMS** | Carefully selected third party publisher websites, social media platforms and advertising platforms where we advertise our services or free content to attract new customers, using third party cookies or data to understand and improve where and how people are engaging with our adverts/content both off and on our website.

**BUSINESS ACQUIRER** | Prospective or actual acquirer of some or all of our business in the event that any part of our business were to be sold (information about clients and prospects will be a business event).

**AUTHORITIES** | To comply with legal obligations; to enforce our legal agreements; to protect our rights, property or safety and that of our clients and others. This could include exchanging information with other companies for fraud prevention purposes.

### Security and Where we Store your Personal Data

We are committed to ensuring that your information is secure. In order to try to prevent unauthorised access or disclosure, we have put in place strict procedures and security features around the app, our sites and our internal systems and

databases. All information you provide to us is stored on our secure servers. Where we have given you (or where you have chosen) a password or PIN which enables you to access certain parts of our sites, you are responsible for keeping the password or PIN confidential. We ask you not to share your login details with anyone.

You should remember that transmission of information via the internet is not completely secure. We may use encryption as way of protecting attachments to emails that may contain your personal information. However, we cannot guarantee the security of information that you transmit to us via our sites or by email. Any transmission is at your own risk.

Data provided to third party partners such as online platforms, will be aggregated (groups of people rather than individuals) and either anonymised (removing personally identifiable information for privacy protection) or pseudonymised (a data management process where personal information is de-identified by replacing it with artificial identifiers or pseudonyms again for privacy purposes). We may also use third party cookies, which are managed by partners and governed by your interactions and consents with those individual third parties as well as our own website.

Before we share your information with any Data Processors or Business Partners we make sure that they have appropriate technical and organisational security measures in place to keep your information safe and that they have undertaken to comply with data protection law and regulations. Typically, the data that we collect from you will be transferred to, and stored at, a destination inside the European Economic Area ("EEA"). It will also be processed by staff operating inside the EEA who work for us or for one of our suppliers. If for any reason we need to transfer and store your data outside the EEA, we will do so only where we have assessed that equivalent data protection measures are in place. By providing us with your personal information, you agree to this transfer, storing or processing.

### How long we keep your Personal Data

We will retain your personal data for the duration of our contract with you and for a reasonable period of time afterwards. We are bound by financial regulation to keep our records for set periods of time and will also wish to retain enough information where we have a legitimate interest in doing so.

Uses made of the Information - table

Type of Personal Information	Description	What we use this Information for	Our Legal Basis for Using your Information
Contact	Your name, where you live and how we contact you	To manage our relationship with you and to identify you	<ul style="list-style-type: none"> <li>• Consent</li> <li>• A contract with you</li> <li>• Our legal duty</li> <li>• Our legitimate interests</li> </ul>
Financial	The balance of your Killik & Co accounts and your financial situation (income, expenditure, savings, pensions, mortgages etc.)	To provide you with accurate information about your Killik & Co account; to assess the suitability of investments we may recommend or buy/sell on your behalf	<ul style="list-style-type: none"> <li>• A contract with you</li> <li>• Our legal duty</li> </ul>
Socio-demographic	Details about your profession, previous financial experience, age	To recommend investments that you are capable of understanding (or to provide information to help you understand them) and which are suitable for your needs	<ul style="list-style-type: none"> <li>• A contract with you</li> <li>• Our legal duty</li> <li>• Our legitimate interest</li> </ul>
Transactional	Details about payments to and from your Killik & Co accounts and trading within them	To provide you with accurate information about your Killik & Co accounts; to manage fraud and other financial crime risks	<ul style="list-style-type: none"> <li>• A contract with you</li> <li>• Our legal duty</li> <li>• Our legitimate interest</li> </ul>
Contractual	Details about the products and services we provide to you	To ensure we know what services you have signed up for and that we deliver those services to you	<ul style="list-style-type: none"> <li>• A contract with you</li> </ul>
Locational	Data about where you are located which may come from your IP address and/or mobile phone when you browse our sites or app	To understand regional differences in the way clients interact with our services, which may help us develop new services or regional client events	<ul style="list-style-type: none"> <li>• Our legitimate interests</li> </ul>
Social relationships	Your family and other legal relationships which may include your businesses, Trusts and legal advisors	Where instructed by you, to manage connected accounts as a single portfolio; to be able to take into consideration your whole family situation when giving advice; to liaise with trustees or legal advisers on your behalf in relation to your investments; in the event that we have concerns that you may be a victim of fraud or be in a vulnerable situation, to contact your family or legal representatives for assistance	<ul style="list-style-type: none"> <li>• A contract with you</li> <li>• Our legal duty</li> </ul>
Communications	Information contained within online enquiries, letters, emails, telephone conversations and meetings we have with you	To manage our relationship with you	<ul style="list-style-type: none"> <li>• Our legitimate interests</li> </ul>
Usage data	Information about how you use our products and services, sites and app	To deliver our service, personalise content and make suggestions and to understand how you use our services and interact with us and the things you are interested in	<ul style="list-style-type: none"> <li>• Our legitimate interests</li> </ul>
Special "categories of data"	Special protection is given to certain types of information which is deemed to be sensitive in nature. This can include details of your racial or ethnic origin, religious or philosophical beliefs, any trade union membership, your genetic and bio-metric data, data about your health, any criminal convictions and offences	To understand your lifetime investment needs we may collect data about your general health to deliver suitable investment services. When we collect information in this category from you we will always ask for additional consent, this is referred to as your explicit consent	<ul style="list-style-type: none"> <li>• Your explicit consent</li> </ul>
Consents	Details of the consent you gave us to send you marketing materials	To carry out marketing campaigns	<ul style="list-style-type: none"> <li>• Your consent</li> </ul>
National identifier	Normally your national insurance number. If you are not a British National this will be another number or code issued to you by a government to identify who you are	To identify you and provide tax efficient wrappers as part of our investment services. As part of our transaction reporting requirements to regulatory authorities	<ul style="list-style-type: none"> <li>• A contract with you</li> <li>• Our legal duty</li> </ul>

### Links to Other Websites

Our sites may contain links to other sites of interest. However, once you have used these links to leave our sites, you should note that we do not have any control over those other sites. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting other sites and such other sites are not covered by this Privacy Policy. You should exercise caution and look at the privacy statement applicable to the sites in question.

### Controlling your Personal Information

#### You may Choose to Restrict the Collection or use of your Personal Information in the Following ways:

**CONSENT** | If you have previously agreed to us using your personal information for our own marketing purposes, you may change your mind and withdraw this consent at any time. You may also view and adjust your cookie settings on our website.

**ACCESS** | You may request details of the personal information which we hold about you. We must provide this to you free of charge within 30 calendar days of your request.

**CORRECTION** | If you believe that any information we are holding about you is incorrect or incomplete, please tell us as soon as possible. We will promptly correct anything found to be incorrect.

**OBJECTION, RESTRICTION OR DELETION** | You may have the right to object to the way in which we process your data, you may ask us to restrict the processing of your data, or you may ask us to delete it. You may also view and adjust your cookie settings on our website.

Please direct all enquiries concerning your control over your personal information to [compliance@killik.com](mailto:compliance@killik.com).

The supervisory authority for data protection in the UK is the Information Commissioners Office. You have the right to complain to them about the way in which we process your data and their helpline number is **0303 123 1113**.

See also Appendix 1 for details on how you can manage the way that cookies use and store information about you.

### Updates to this Privacy Policy

We may change this policy from time to time by updating this page. You should check this page periodically for any changes.

### Appendix 1 – Cookie Policy

Killik & Co ("us", "we", or "our") uses cookies and similar tracking technology on killik.com and all our websites and online services.

Our Cookies Policy explains what cookies are, how we use cookies, how third-parties we may partner with may use cookies on our site, your choices regarding cookies and further information about cookies. The information set out in this policy is provided in addition to our [privacy policy](#) and should be read alongside our privacy policy.

#### What are cookies

Cookies are small pieces of text sent from your web browser, by websites that you visit. A cookie file is stored in your web browser on your computer or mobile device. They are widely used to gather information in order to make websites work, or work more efficiently, as well as to provide web services and functionality for users. They allow us or third-parties to recognize you and make your next visit easier and the experience more useful to you.

Cookies can be "persistent" or "session" cookies.

#### How we use cookies

On our sites, we use cookies that are essential to make them work or to identify which pages are being used. This helps us analyse data about web page traffic and improve our sites in order to tailor them to customer needs generally. We may also be able to identify individual users of the sites, if for example your details are stored within our database. Where this is the case, we may use the data about which areas of our sites you have visited, to analyse trends and tailor our communications to you.

We use cookies with selected third party publishers websites, social media platforms and advertising platforms where we advertise our services or free content to attract new customers, using third party cookies or data to understand and improve where and how people are engaging with our adverts/content both off and on our websites.

When we send you an email that contains a link to our site or app, we may use cookies to tell us if you click on the link. This is intended to help us to direct other information to you that you may find of interest or may prompt us to contact you.

Overall, cookies help us provide better website experience, by enabling us to monitor which pages visitors find useful and

which they do not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us or with third party websites or about your journey through the websites.

### Types of cookies we use

We use several types of cookies, which we describe in this section.

**NECESSARY** | cookies that are essential to provide you with the digital services you are trying to access or have requested. This might include basic functionalities and security features. If you set your browser to block these cookies, then certain functions may not work for you.

### Non-Necessary:

**ANALYTICAL** | cookies which measure how often you visit our sites and how you use them. We use this information to get a better sense of how our users engage with our website, content and services to improve them and so that users have a better experience. For example, we collect data on which pages are most frequently visited, and by which types of users. We also use third party cookies to help with performance. For example the Google Analytics cookie gives us information such as your journey between pages and whether you have downloaded anything (details of how to opt out are below).

**FUNCTIONAL** | cookies that are used to recognise you and remember your preferences or settings when you return to our site, so that we can provide you with a more personalised experience. A mix of first and third party cookies may be used.

**SOCIAL MEDIA & ADVERTISING** | cookies that are used to collect information about your visit to our site, the content you viewed, the links you have followed and the information about your browser, device and your IP address. This helps us to understand what and where our advertising is most relevant and can be used to help us tailor these advertisements or to find other potential customers.

### How to manage cookie

You can manage the use of cookies, including advertising cookies, and disable the sharing of data with partners for advertising purposes, by using the steps set out here.

By clicking the cookie settings link in the footer of our website you can adjust the settings for the cookies that we control on our website.

There are some third-party cookies that we cannot control, for example if you chose to share an article via a social media buttons. You can usually still adjust these cookies but not through us.

You can see a list of all cookies used here, as well as the type, duration and purpose. Please note, this list changes from time to time and any updates will be made to this document available online.

## Killik.com cookies

Cookie ID	Type	Duration	URL	Function
JSESSIONID	Session	Ends with session	NR-DATA.NET	Browser compliance and developer tools - my relic
YSC	Session	Ends with session	.YOUTUBE.COM	Assist with user journey
_cfduid	Persistent	1 hour	Cloudflair	Content distribution and service
Cookielawinfo-checkbox.sma	Persistent	1 hour	killik.com	Compliance
Cookielawinfo-checkbox.non-necessary	Persistent	1 hour	killik.com	Compliance
Cookielawinfo-checkbox.necessary	Persistent	1 hour	killik.com	Compliance
_fbp	Persistent	3 months	killik.com/Facebook	Tracking and ad service
Consent	Persistent	>10 yrs	.YOUTUBE.COM	Compliance
Visitor_info_live	Persistent	6 months	.YOUTUBE.COM	Tracking and ad service
_gat	Persistent	1 hour	google.com	Tracking. Ad service and user journey improvement
_ga	Persistent	2 years	google.com	Tracking. Ad service and user journey improvement
_gid	Persistent	1 day	google.com	Tracking. Ad service and user journey improvement

We are unable to disable cookies within our Client Login services (MyKillik and Client Portal) and by using these services you accept that cookies will be placed on your computer.

## Client log in cookies

Cookie ID	Type	Duration	URL	Function
Mba.Killik.WebSite.AuthDevice	Persistent		Client.killik.com	OTP login experience
_cfduid	Persistent	1 hour	Cloudflair	Content distribution and service
ASP.NET_SessionId	Session	Ends with session	Client.killik.net www.mykillik.com	Login and security
_RequestVerificationToken	Session	Ends with session	www.mykillik.com	Security
_gat	Persistent	1 hour	google.com	Tracking. Ad service and user journey improvement
_ga	Persistent	2 years	google.com	Tracking. Ad service and user journey improvement
_gid	Persistent	1 day	google.com	Tracking. Ad service and user journey improvement

Information can usually be found in your web browser's help section or on [this page](#).