

Privacy Policy

Overview

Please read this Privacy Policy carefully. It applies to you when you visit killik.com, MyKillik.com and 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 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.

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.

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.

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 overleaf 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
- 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 - How we use Cookies.

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"> • Consent • A contract with you • Our legal duty • Our legitimate interests
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"> • A contract with you • Our legal duty
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"> • A contract with you • Our legal duty
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"> • A contract with you • Our legal duty
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"> • A contract with you
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"> • Our legitimate interests
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"> • A contract with you • Our legal duty
Communications	Information contained within letters, emails, telephone conversations and meetings we have with you	To manage our relationship with you	<ul style="list-style-type: none"> • Our legitimate interests
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"> • Our legitimate interests
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"> • Your explicit consent
Consents	Details of the consent you gave us to send you marketing materials	To carry out marketing campaigns	<ul style="list-style-type: none"> • Your consent
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"> • A contract with you • Our legal duty

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.

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.

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.

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.

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.

Please direct all enquiries concerning your control over your personal information to 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 – How we use Cookies

A cookie is a small file which is placed on your computer's hard drive by your web browser under the request of a web sites owner or operator. Cookies are used to allow web applications to respond to you as an individual with the web application tailoring its operations to your needs, likes and dislikes by gathering and saving information about your preferences in the cookie file.

When we send you an email that contains a link to our sites 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.

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.

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 about your journey through the websites.

By using the websites you accept that cookies will be placed on your computer. You can block or remove cookies through your web browser. If you block cookies, for the most part the sites should continue to operate normally, however there may be some areas where you may not be able to take full advantage of the site's functionality.

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