



1. Introduction

- 1.1. Sarasin Asset Management Limited ("**SAM**") is committed to protecting and respecting your privacy.
- 1.2. www.sarasinassetmanagement.com ("**the site**") is operated by Sarasin & Partners LLP ("**S&P**") on behalf of SAM. SAM is registered in England and Wales with registration number 163584 with registered offices at Juxon House, 100 St. Paul's Churchyard, London EC4M.
- 1.3. This policy (together with our website terms of use and any other documents referred to on the site) sets out the basis on which any personal data that is collected from you, or that you provide to us, will be processed. Please read the following carefully to understand our practices regarding your personal data and how SAM will treat it. By visiting www.sarasinassetmanagement.com you are accepting and consenting to the practices described in this policy.
- 1.4. For the purpose of the Data Protection Act 1998 (the "**Act**"), SAM is the Data Controller whose registered address is at Juxon House, 100 St. Paul's Churchyard, London EC4M 8BU. SAM's nominated representative for the purpose of the Act is Tim Backhouse. Alternatively, you can contact our Information Security Officer, Robyn Leader.
- 1.5. SAM is authorised and regulated by the U.K. Financial Conduct Authority and registered as an Investment Advisor with the U.S. Securities and Exchange Commission.

2. Information SAM may collect from you

- 2.1. SAM may collect and process, or arrange for S&P to collect and process, the following data about you:
 - (a) information you give SAM: you may give SAM information about you by filling in forms on the site or by corresponding by phone, e-mail or otherwise. The information you give SAM may include your name, address, e-mail address and phone number.
 - (b) information collected about you with regard to each of your visits to the site. The site may automatically collect the following information:
 - (i) technical information, including the internet protocol ("**IP**") address used to connect your computer to the internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform; and
 - (ii) information about your visit, including the full uniform resource locators ("**URL**") clickstream to, through and from our site (including date and time); information you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs); and methods used to browse away from the page.

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- (c) information SAM receives from other sources: SAM may receive information about you if you use any of the other websites operated by S&P or the other services provided by SAM. In this case SAM will have informed you when collecting that data that it may be shared internally and combined with data collected on the site. SAM is also working closely with third parties (including, without limitation) business partners, sub-contractors in analytics providers and search information providers, and may receive information about you from them.

3. Use of Cookies

- 3.1. The site uses cookies. For detailed information on the cookies we use and the purposes for which we use them see [SAM's Cookie Policy](#).

4. Uses made of the information

- 4.1. SAM uses information held about you in the following ways:

- (a) information you give to us. The information will be used:
- (i) to carry out obligations arising from any contracts entered into between you and SAM and to provide you with the information, products and services that you request from SAM;
 - (ii) to provide you with information about other goods and services SAM offers that are similar to those that you have already purchased or enquired about;
 - (iii) to provide you, or permit selected third parties to provide you, with information about goods or services SAM feels may interest you. If you are an existing customer, SAM will only contact you by electronic means (e-mail or SMS) with information about goods and services similar to those which were the subject of a previous sale or negotiations of a sale to you. If you are a new customer, and where SAM permits selected third parties to use your data, SAM or the third party will contact you by electronic means only if you have consented to this. If you do not want SAM to use your data in this way, or to pass your details on to third parties for marketing purposes, please tick the relevant box situated on the form on which SAM collects your data;
 - (iv) to notify you about changes to SAM's service;
 - (v) to ensure that content from the site is presented in the most effective manner for you and for your computer.
- (b) information collected about you. This information will be used:
- (i) to administer the site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
 - (ii) to improve the site to ensure that content is presented in the most effective manner for you and for your computer;
 - (iii) to allow you to participate in interactive features of SAM's services, when you choose to do so;
 - (iv) as part of SAM's efforts to keep the site safe and secure;

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- (v) to measure or understand the effectiveness of advertising SAM serves to you and others, and to deliver relevant advertising to you; and
 - (vi) to make suggestions and recommendations to you and other users of the site that may interest you or them.
 - (c) information received from other sources. This information may be combined with information you give to us and information SAM collects about you. SAM may use this information and the combined information for the purposes set out above (depending on the types of information we receive).

5. Disclosure of your information

- 5.1. SAM may share your personal information with any member of the Sarasin (U.K.) Limited group, which means SAM's ultimate holding company and its subsidiaries.
- 5.2. SAM may share your information with selected third parties including:
 - (a) business partners, suppliers and sub-contractors for the performance of any contract we enter into with them or you;
 - (b) analytics and search engine providers that assist us in the improvement and optimisation of our site.
- 5.3. SAM may disclose your personal information to third parties if we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply [SAM's terms of use](#) and other agreements.

6. Where we store your personal data

- 6.1. The data collected from you may be transferred to, processed and stored at, a destination outside the European Economic Area ("EEA"). By submitting your personal data, you agree to this transfer, storing or processing. SAM will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.
- 6.2. Unless otherwise transferred in accordance with clause 6.1, the data SAM collects from you will be stored on S&P's secure servers. Where SAM has given you (or where you have chosen) a password which enables you to access certain parts of the site, you are responsible for keeping this password confidential. SAM asks you not to share a password with anyone.
- 6.3. Unfortunately, the transmission of information via the internet is not completely secure. Although SAM will do their best to protect your personal data, it cannot guarantee the security of your data transmitted to the site. Any transmission is at your own risk. Once SAM has received your information, it will use strict procedures and security features to try to prevent unauthorised access.

7. Your rights

- 7.1. You have the right to ask SAM not to process your personal data for marketing purposes. SAM will usually inform you (before collecting your data) if it intends to use your data for such purposes or if it intends to disclose your information to any third party for such purposes. You can exercise your right to prevent such processing by checking certain boxes on the forms it uses to collect your data. You can also exercise the right at any time by contacting SAM at marketingservices@sarasin.co.uk

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- 7.2. Our site may, from time to time, contain links to and from other websites. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that SAM do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

8. Access to information

- 8.1. The Act gives you the right to access information held about you. Your right of access can be exercised in accordance with the Act. Any access request may be subject to a fee of £10 to meet SAM's costs in providing you with details of the information it holds about you.

9. Changes to SAM's privacy policy

- 9.1. Any changes SAM may make to its privacy policy in the future will be posted on this page. Please check back frequently to see any updates or changes.

10. Contact

- 10.1. Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to Tim Backhouse or Robyn Leader (Information Security Officer) c/o marketingservices@sarasin.co.uk.