

SARASIN

SARASIN ASSET MANAGEMENT LIMITED

# DATA PROTECTION SUMMARY STATEMENT

EFFECTIVE DATE: APRIL 2025

Juxon House  
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United Kingdom

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[www.sarasinassetmanagement.com](http://www.sarasinassetmanagement.com)



- 1.1** All capitalised terms used but not defined within this Summary Statement, shall have the meanings attributed to them in our Terms of Business (which form part of our Client Agreement with you), as updated and amended from time to time, and made available on our website (under the Important Information section).
- 1.2** “**Applicable Data Protection Law**” shall mean (a) the UK Data Protection Act 2018 as amended from time to time; (b) Regulation S-P, as applicable to U.S. clients; and/ or (c) the General Data Protection Regulation as retained by the UK (“**UK GDPR**”) as the context requires, read in conjunction with and subject to any further applicable UK national legislation that may provide for specifications or restrictions of the UK GDPR’s rules.
- 1.3** In relation to the services provided to you under our Client Agreement, we act as the Data Controller as defined in the Applicable Data Protection Law.
- 1.4** We may collect, use and store the personal information which you may provide to us from time to time (including, without limitation, via the Client Investment Profile) or in correspondence with us, including information relating to our services you have acquired from us, transactions that we carry out on your behalf and your relationship with us and our Associates, in accordance with the Applicable Data Protection Law (“**Personal Information**”).
- 1.5** If you contact us we may keep a record of that correspondence and we may keep copies of any documents that you provide to us including any documents provided for verifying your identity such as your passport or driving licence in accordance with our record retention policy.
- 1.6** You acknowledge that we may use and process the Personal Information that we collect:
- a.** to process and implement your Client Investment Profile and open your Portfolio account and related trading arrangements;
  - b.** to supply the services in accordance with our Client Agreement;
  - c.** to meet our obligations under Applicable Regulations;
  - d.** for client service, analysis and our own marketing and market research purposes;
  - e.** to undertake credit and reference checks and/ or to recover a debt or for the purposes of legal proceedings; and/or
  - f.** for general account administration purposes.
- 1.7** You acknowledge that we may share your Personal Information in the following circumstances:
- a.** where we use your Personal Information to assess your eligibility for our services and to verify your identity;
  - b.** we may share your Personal Information with our Associates and with third parties who we use to assist us in administering and operating your Portfolio. We will always take appropriate measures and



- c.** meet our legal obligations to ensure that any Personal Information transferred to such third parties is kept securely;
  - d.** if we restructure our business or the whole or any part of our business is sold then we may transfer your information to another division or part of the group (if there is a restructuring) or to the buyer of our business (if the business is sold);
  - e.** we may share your Personal Information with law enforcement agencies, regulatory authorities, fiscal or tax authorities or other relevant bodies for crime prevention purposes or to fulfil any legal or regulatory obligation in the United Kingdom and overseas (including outside the EEA); and
  - f.** we may also share your Personal Information with our Associates.
- 1.8** Your request for products or services that necessitates us processing your Personal Information in order to perform our contract with you (or that necessitates us processing your Personal Information before entering into such contract) is our primary legal ground for the processing of your Personal Information. However, there may be circumstances where we also rely on other valid legal grounds for processing your Personal Information. These include, for example:
  - a.** compliance with a legal obligation to which we are subject; and
  - b.** our legitimate interests as a business (except where such interests are overridden by your interests or rights).
- 1.9** Where you have given us permission to do so, we may share your Personal Information to provide you with information about other similar services provided by us which we think may be of interest to you. We may provide this information by telephone, post, email, text message and other means. If you would like to stop receiving this information you should notify us.
- 1.10** Our record retention policy requires us to keep records for a period stipulated by us in accordance with Applicable Regulations from the date of termination of the Client Agreement. All client hard copy Personal Information may be destroyed securely after seven (7) years from the termination date of this Client Agreement. We scan and retain all hard copy documentation including client Personal Information within our data storage system for as long as we have a legitimate and lawful purpose for doing so. Data retained by us may be archived by us on or off-site. Where data is archived off-site, third party providers may be used.
- 1.11** Under Applicable Data Protection Law, you have certain rights in relation to your Personal Information. You may:
  - a.** check whether we hold and ask to see a copy of the Personal Information we hold about you;
  - b.** under certain circumstances, ask us to rectify any inaccurate and/or complete any incomplete Personal Information we hold about you;
  - c.** under certain circumstances, ask us to provide

certain of your Personal Information to you in a structured, commonly used and machine-readable format and have it transferred to another provider of the same or similar services;

- d.** under certain circumstances, ask us to stop processing your Personal Information;
- e.** under certain circumstances, ask us to erase your Personal Information; or
- f.** decline to provide information we may request.

You should note that exercise of the rights in (d), (e) or (f) above may result in certain products or services being made unavailable to you.

- 1.12** If you have a complaint about our handling of your Personal Information this should be made in accordance with our Complaints and Compensation procedure, a copy of which is available on our website (under Important Information). You may also contact the relevant regulatory authority directly. To contact the UK regulatory authority (the Information Commissioner's Office) please visit [www.ico.org.uk](http://www.ico.org.uk) for instructions.
- 1.13** If any Personal Information concerning other individuals (which may include your family members) is provided to us, you represent to us that you have obtained their consent to the use of such data and that you can demonstrate this to us, if requested.
- 1.14** If you have any questions or comments on anything set out in this Data Protection Summary Statement or the use of your Personal Information, please contact [dataprotection@sarasin.co.uk](mailto:dataprotection@sarasin.co.uk).



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