

Privacy Policy and Cookies Policy

The Tideway Investment Group (“Tideway”) recognises the importance of protecting your personal and financial information when you visit our websites or send information to us. This Policy, including the Cookies Policy, is designed to help you understand the information collection practices at Tideway including any Websites owned or operated by Tideway, including (but not limited to):

<http://www.tidewayinvestment.co.uk>; <https://www.tidewayassetmanagement.co.uk/>;
<https://www.tidewaywealth.co.uk/>; <https://www.tidewayintermediaries.co.uk/>;
<https://www.finalsalarytransfer.com/>.

Information collected on our Websites is collected by Tideway. Contact information is included in this Policy and on the Website.

Tideway Investment Group comprises the following entities:

Tideway Investment Partners LLP, Register No. OC6946140

Tideway Wealth Management Limited, Register No. 11705351

Tideway Asset Management Limited, Register No. 11705341

All incorporated in England and Wales with their registered address being: 107 Leadenhall Street, London EC3A 4AF

We are committed to:

- (a) protecting the personal data you provide to us;
- (b) telling you how we use the information we gather about you; and
- (c) ensuring that you know the circumstances under which we may disclose your personal data.

This Policy covers the privacy and data protection policies regarding both our Websites as well as any personal information that you may share with us separately. This Policy should be read in conjunction with any other applicable policies, terms and conditions in place between you and Tideway.

CHANGES TO THIS POLICY

This Policy is dated 3 April 2019.

Previous versions of this Policy are available upon request. Tideway reserves the right to amend this Privacy Policy at any time without notice, by updating this posting, in which case the date of the Policy will be revised. However, you will be asked to provide your consent to updated versions of this Policy in the event of a material change to the information contained within it. In addition, you will be asked to reaffirm your consent to this Policy on a periodic basis. The current version of this Policy can be accessed from the link on the homepage, or at the bottom of our website pages. By accessing the Website following amendments, you are accepting the amended Policy.

CONTACT US

If you have any questions about this Policy, or our privacy related practices, please contact us:

- ▲ through your usual contact at Tideway;
- ▲ by email at compliance@tidewayinvestment.co.uk
- ▲ by phone at Tideway +44 (0)20 3143 6100
- ▲ by post: 107 Leadenhall Street, London EC3A 4AF

Data Protection and Privacy

INFORMATION COLLECTION AND USE

Personal Data:

The personal data and other information you submit either directly to Tideway or via our Websites and Client Portal is used to service your account, to improve our services to you and/or to provide you with information on Tideway's products and services. The Data Protection law says we are allowed to use personal information only if we have a proper reason to do so. The law says Tideway must have one or more of the following reasons:

- ▲ To fulfil a contract we have with you, or
- ▲ When it is our legal duty, or
- ▲ When it is in our legitimate interest, or
- ▲ When you consent to it.

When we have a business reason of our own to use your information, this is called a 'legitimate interest'.

The law requires us to treat some types of sensitive personal information as special. This includes information about racial or ethnic origin; sexual orientation, religious beliefs, trade union membership, health data and criminal records. We will not collect or use these types of data without your consent unless the law allows us to do so.

You may be asked to voluntarily provide certain personal information details about yourself such as your name, address, telephone number, email address details and other information in connection with Tideway's client registration procedures. Tideway will use this information for the administration and servicing of your investments and other related activities and to ensure compliance with its obligations under the UK's legal and regulatory regime. Tideway may disclose the information to its agents and service providers.

Please note that by submitting personal information you are consenting to such information being processed for the purposes referred to above. You agree that Tideway has the right to use and store such data on its internal systems and to transfer it to its associated companies (if applicable), whether inside or outside the European Union, for the purpose of providing services to you. You should also be aware that the level of protection in relation to the processing of personal data may not be the same in countries outside the European Union as in the United Kingdom.

We will not sell, share or rent your personal data to others in contravention of this Privacy Policy.

Your Rights

You may contact us to:

- ▲ request that we amend, rectify, delete or update the personal data we hold about you;
- ▲ where possible (e.g. in relation to marketing) amend or update your choices around processing;
- ▲ request a copy of personal data held by us.

Where you would like to receive a copy of all personal data held, such request should be in writing (email or post), addressed to our Chief Compliance Officer at our offices and should contain as much information as possible to facilitate our dealing with this request. We have one month to respond to you.

Sharing your information with Service Providers

Your personal data may be collected and processed for the purposes above by a third-party service provider engaged by us for these purposes.

Service providers we engage are not currently based in countries outside of the European Union or EEA in countries. Countries outside of the EU or EE may have different standards of protection for personal data. Recipients will be required by us to protect your information in accordance with applicable data protection laws.

Compliance with Laws

Your personal data will be held and processed by us in accordance with applicable data protection law.

Tideway may disclose the information to its agents and service providers in order to provide you with advisory and investment services. We will not provide any personal data to any other persons, except if we are required to make disclosures by any law, any government or private parties in connection with a lawsuit, subpoena, investigation or similar proceeding.

E-mail and Marketing

Tideway does not sell its clients' personal data, nor will we provide your personal data to third parties for their marketing purposes without your consent. Tideway will not send you e-mail messages without first receiving your permission, unless it relates to servicing your account or unless you have consented to receiving electronic delivery of documents as part of our service. It is our policy to include instructions for unsubscribing.

Business Transfers

If the business, stock or assets of Tideway, are acquired or merged with another business entity, we will share all or some of your information with this entity to continue to provide our service to you. You will receive notice of such an event and the new entity will inform you of any changes to the practices in this Privacy Policy. If the new entity wishes to make additional use of your information, you may decline such use at such time.

Disclosure to Third Parties

The personal data you provide to us will only be disclosed to third parties if we have your permission, or as set out in this Privacy Policy. We may disclose details about the general use of our Websites to third parties – for example, to demonstrate patterns of use to other business partners. Information we pass on for this purpose will not include any personal data by which you may be identified. We endeavour to prevent unauthorised disclosures of your personal data by third parties, but we are not responsible for

any unauthorised disclosures or other breaches of security or for the actions of others if the information was passed to them with your authority or with the authority of anyone other than us or our group companies.

Third-Party Websites

Tideway disclaims responsibility for the privacy policies and customer information practices of third party internet websites hyperlinked from our Website or this Privacy Policy.

HOW DO WE STORE YOUR PERSONAL INFORMATION?

We store your information electronically and do not keep paper files.

Electronic information includes all personal details extracted from application forms etc, and transactional data from activity passing through your investment portfolio which might include: withdrawals, dividends received, share sales and purchases.

All electronic information is stored on our own server which is not accessible other than by authorised employees of Tideway and its agents. Our agents include organisations that assist us with mailing your quarterly statement. In order to ensure the security of data, all agents are carefully selected and abide by stringent Service Level and Non-Disclosure agreements.

In addition, electronic information is 'backed-up' on a regular (normally daily) basis and stored off-site at both our Disaster Recovery Site and elsewhere, in order to ensure we can have our systems up and running as soon as possible in the event of a fire or other incidents.

Tideway protects your personal data when you transact business on our Website or Portal by requiring the use of a browser software program that supports industry standard SSL encryption with 256-bit key lengths. The "256-bit" designation refers to the length of the key used to encrypt the data being transmitted, with a longer key representing a higher level of security.

Tideway uses a third-party service to help maintain the security and performance of its Websites.

How long does Tideway keep your personal information?

Tideway keeps your personal information for as long as you are a Tideway prospect or client. We may keep your data for up to 10 years after you stop being a prospect or client. The reasons we may do this are:

- to respond to a question or complaint, or to show whether we gave you fair treatment
- to study client data as part of our internal research
- to obey rules that apply to us about keeping records

We may also keep your data for longer than 10 years if we cannot delete it for legal, regulatory or technical reasons. As an example, we must hold pension transfer information indefinitely.

We will only use your personal information for those purposes and will make sure that your privacy is protected.

JOB APPLICANTS, CURRENT AND FORMER TIDEWAY EMPLOYEES

Tideway is the data controller for the information you provide during the process unless otherwise stated. If you have any queries about the process or how we handle your information please contact us at compliance@tidewayinvestment.co.uk.

What will Tideway do with the information you provide to us?

All of the information you provide during the process will only be used for the purpose of progressing your application, or to fulfil legal or regulatory requirements if necessary. We will not share any of the information you provide during the recruitment process with any third parties for marketing purposes or store any of your information outside of the European Economic Area. The information you provide will be held securely by us whether the information is in electronic or physical format.

We will use the contact details you provide to us to contact you to progress your application. We will use the other information you provide to assess your suitability for the role you have applied for.

We do not collect more information than we need to fulfil our stated purposes and will not retain it for longer than is necessary.

The information we ask for is used to assess your suitability for employment. You don't have to provide what we ask for but it might affect your application if you don't.

Offer of Employment

If we make an offer of employment we will ask you for information so that we can carry out employment checks. You must successfully complete employment checks. We are required to confirm the identity of our staff, their right to work in the United Kingdom and seek assurance as to their trustworthiness, integrity and reliability.

You will therefore be required to provide:

- ▲ Proof of your identity – you will be asked to attend our office with original documents, we will take copies.
- ▲ Proof of your qualifications – you will be asked to attend our office with original documents, we will take copies.
- ▲ You will be asked to complete a criminal records declaration to declare any unspent convictions.
- ▲ We will provide your email address to Experian who will contact you to complete an application for a Basic Criminal Record check via the Disclosure and Barring Service, which will verify your declaration of unspent convictions.
- ▲ We will contact your referees, using the details you provide in your application, directly to obtain references.

Upon joining, we will also ask you for the following:

- ▲ Bank details – to process salary payments
- ▲ Emergency contact details – so we know who to contact in case you have an emergency at work

Tideway's policy and procedures require all staff to declare if they have any potential conflicts of interest, or other business interests. If you complete a declaration, the information will be held on your personnel file. Tideway's retains employee records in line with the regulatory and legal requirements applicable to Tideway and as amended from time to time.

Cookies Policy

What are cookies?

Cookies are small text files that are stored in your computer's memory and hard drive, in your mobile device or tablet when you visit certain web pages. They are used to enable websites to function or to provide information to the owners of a website, or other third parties which receive data obtained from that website.

When you visit any website, it may store or retrieve information on your browser, mostly in the form of cookies. This information might be about you, your preferences or your device and is mostly used to make the site work as you expect it to. The information does not usually directly identify you, but it can give you a more personalised web experience.

Why do we use cookies?

Tideway uses some session cookies (eg DB Pension transfer enquiries). This means that the cookies will only operate for the length of a single browsing session. Whilst other cookies have a longer life span to ensure that they fulfil their longer-term purposes (for example the first time you visit our websites you accept our cookies). Please note that, however long the cookies' active life may be, you can delete cookies (and therefore stop any further data collection by them) as further described below.

Google Analytics cookies are used to track number of visits to our website.

If you are using one of our password-protected sites, then the Website may use cookies or other technology to help us authenticate you, store and recognise your configuration and user attributes, facilitate your navigation of the website and customise its content so that the information made available is likely to be of more interest to you.

In broad terms, we use cookies on our Websites for the following purposes:

Usage preferences: Some of the cookies on our Websites are activated when visitors to our sites make a choice about their usage of the site. Our Websites then 'remember' the settings preferences of the user concerned. This allows us to tailor aspects of our sites to the individual user.

Terms and conditions: We use cookies on our Websites to record when a site visitor has seen a policy, such as this one, or provided consent, such as consent to the terms and conditions on our Websites. This helps to improve the user's experience of the site – for example, it avoids a user from repeatedly being asked to consent to the same terms. We also track whether a user has seen other similar documents (such as an online survey) before – again, to ensure that a user's experience of our Websites is a smooth one.

Session management: The software that runs our websites uses cookies for technical purposes needed by the internal workings of our servers. For instance, we use cookies to distribute requests among multiple servers, authenticate users and determine what features of the site they can access, verify the origin of requests, keep track of information about a user's session and determine which options or pages to display in order for the site to function.

Functional purposes: Functional purpose cookies store information that is needed by our applications to process and operate. For example, where transactions or requests within an application involve multiple workflow stages, cookies are used to store the information from each stage temporarily, in order to facilitate completion of the overall transaction or request.

Please note that third parties may use cookies. The kind of cookies and the consequent data processing carried out by such third parties are regulated by their privacy policy. Please see below.

Your cookie preferences

Cookies are necessary in order for you to be able to make full use of Tideway's Websites. In addition, cookies help us provide you with personalised features on our Websites. If you chose to disable cookies, some of Tideway's Website functionality might be impaired.

Local Flash Storage

On certain of our Websites, we include content designed for display using Adobe Flash Player, such as animations, videos and tools. Local flash storage (often referred to as "Flash cookies") can be used to help improve your experience as a user. Flash storage is retained on your device in much the same way as standard cookies but is managed directly by your Flash software.

If you wish to disable or delete information stored locally in Flash, please see the documentation for your Flash software, located at www.adobe.com. Please note that, if you disable Flash cookies, some site functionality may not work.

Third party cookies

When you visit our Websites, you may receive cookies that are set by third parties. These may include cookies set by Google. These cookies are used for the purposes described in the "Why Do We Use Cookies?" section of this policy. We do not control the setting of these third-party cookies, so we suggest you might wish to check the third-party websites for more information about their use of cookies and how to manage them.

To opt out of being tracked by Google Analytics across all websites visit:
<http://tools.google.com/dlpage/gaoptout>

Amending cookie preferences

If you wish to remove cookies set by our Websites from your browser in the future, you may delete them. The instructions for removing cookies from your computer or mobile device depend on the operating system and web browser you use. Please note, however, that withdrawing your agreement to the use of cookies on our sites will impair the functionality of the sites.

The site www.allaboutcookies.org includes instructions for managing cookies on many commonly used browsers, or you may consult the vendor documentation for your specific software.

Further information about cookies

If you would like to find out more about cookies in general and how to manage them, please visit www.allaboutcookies.org.