

Caledonian Trust PLC

Privacy Policy

Welcome to our privacy notice

Caledonian Trust PLC (“Caledonian”) respects your privacy and is committed to protecting your personal data. This privacy notice will inform you as to how we look after your personal data and tell you about your privacy rights and how the law protects you.

Please use the Glossary at the end to understand the meaning of some of the terms used in this privacy notice.

Purpose of this privacy notice

This privacy notice aims to give you information on how Caledonian collects and processes your personal data, including any data you may provide through this website when you submit an online enquiry.

This website is not intended for children and we do not knowingly collect data from children.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

Controller

Caledonian is the controller and is responsible for your personal data (collectively referred to as “we”, “us” or “our” in this privacy notice).

Contact details

Our full details are:-

- Full name of legal entity: Caledonian Trust PLC
- Name or title of data protection contact: Michael Baynham
- Email address: michael.baynham@caledoniantrust.com
- Postal address: 61A North Castle Street, Edinburgh EH2 3LJ
- Telephone number: 0131 220 0416

You have the right to make a complaint at any time to the Information Commissioner’s Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk (<http://www.ico.org.uk>), Telephone 0303 123 1113). We would, however, appreciate the opportunity to deal with your concerns before you approach the ICO so please contact us in the first instance.

Changes to the privacy notice and your duty to inform us of changes.

This version was last updated on 14 June 2018.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

Third-party links

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

The data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you, which we have grouped together as follows:

- **Identity Data** includes first name, middle name(s), maiden name, last name, marital status, title, date of birth, gender and national insurance number.
- **Contact Data** includes billing address, postal address, email address and telephone numbers.
- **Financial Data** includes bank account details.
- **Transaction Data** includes details about payments to and from you.
- **Marketing and Communications Data** include your preferences in receiving marketing from us and your communication preferences.

We do not collect any **Special Categories of Personal Data** about you through our website (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences through our website.

How is your personal data collected?

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us Identity, Contact, Financial, Transaction and/or Marketing and Communications Data by:-

- Communicating with us by telephone, fax, email or post, though we would ask you to limit the information you share via email to limit exposure to cyber-crime.
- During an appointment with one of our members of staff.
- **Third parties or publicly available sources.** We may receive personal data about you from third parties and public sources, for example:-
- Contact, Financial and Transaction Data from search information providers.
- Identity and Contact Data from publicly available sources such as Companies House.

Our reasons for using your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interest.
- Where we need to comply with a legal or regulatory obligation, for example, anti-money laundering and mandatory screening checks or disclosure to law enforcement.
- Where collecting such data is necessary for the establishment, exercise or defence of legal claims.

Generally we do not rely on consent as a legal basis for processing your personal data other than in relation to sending marketing communications to you via email or post. You have the right to withdraw consent to marketing at any time by contacting us.

Our Legitimate Interests

We have legitimate business interests in:-

- Managing our business relationship with you, your company or organisation;
- Understanding and responding to inquiries;
- Identifying what our customers want and developing our relationship with you, your company or organisation;
- Improving our business

- Enforcing our terms of engagement, website and other terms and conditions; and
- Ensuring our systems and premises are secure.

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you would like an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

Disclosures of your personal data

We may have to share your personal data with the parties set out below -

- External Third Parties as set out in the Glossary.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our contracts with them.

International transfers

We do not transfer your personal data outside the European Economic Area (EEA).

Data Security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. However, the transmission of information via the internet is not completely secure. Although we will take all reasonable measures to protect your personal information, we cannot guarantee the security of your information transmitted and any transmission is at your own risk.

We limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and the Information Commissioner's Office of a breach where we are legally required to do so.

Data retention

How long will you use my personal data for?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. Typical retention periods range from 5 to 20 years. Please contact us to ask us for details of retention periods for different aspects of your personal data.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances you can ask us to delete your data: see *Request erasure* below for further information.

Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data.

- ***Request access to your personal data.*** You are entitled to ask us if we are processing your data and, if we are, you can request access to your personal data. You would receive a copy of the personal data we hold about you and certain other information about it.
- ***Request correction of your personal data.*** You are entitled to request that any incomplete or inaccurate personal data we hold about you is corrected, though we may need to verify the accuracy of the new data you provide to us.
- ***Request erasure of your personal data.*** You are entitled to ask us to delete or remove personal data in certain circumstances. There are exceptions, where we may refuse a request for erasure, for example, where the personal data is required for compliance with law or in connection with claims.
- ***Object to processing of your personal data.*** Where we are processing your personal data based on a legitimate interest (or those of a third party) you may challenge this. However, we may be entitled to continue processing your information. You also have the right to object where we are processing your personal information for direct marketing purposes.

- ***Request restriction of processing your personal data.*** You are entitled to ask us to suspend the processing of certain aspects of your personal data, for example, if you want us to establish its accuracy or the reason for processing it.
- ***Request transfer of your personal data.*** You may request the transfer of personal data to another party. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- ***Right to withdraw consent.*** Where we are processing personal data with consent, you can withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you.

If you wish to exercise any of the rights set out above, please contact us.

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

Glossary

LAWFUL BASIS

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Comply with a legal or regulatory obligation means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

THIRD PARTIES

External Third Parties

- Service providers acting as processors based in the EU who provide IT and system administration services, including marketing and advertising agencies to support and display ads on our website and other social media tools.
- Professional advisers acting as processors or joint controllers.
- HM Revenue & Customs, law enforcement bodies and our regulators, including any other authorities acting as processors or joint controllers based in the United Kingdom who require reporting of processing activities in certain circumstances, in accordance with legal requirements or good practice.
- Appropriate parties in the event of emergencies, in particular to protect health and safety of our clients, staff and organisations.
- Screening service providers so that we can comply with legal obligations in relation to the prevention or protection of crime, anti-money laundering, sanctions screening and other required checks.