

Privacy notice

This privacy notice has been prepared on behalf of Canaccord Genuity Wealth Limited, CG Wealth Planning Limited, Canaccord Genuity Wealth (International) Limited, Canaccord Genuity Asset Management Limited and Intelligent Capital Limited (together Canaccord Genuity Wealth Management (CGWM), we, us or our). It explains how we use personal data we collect about you and your rights in relation to the processing of your data.

To whom does this notice apply?

This notice applies to you if you are an individual customer, their family member, their associate or their authorised person. It applies to you if you are a person associated with a corporate customer (such as a director, beneficial owner or authorised signatory of an IFA, intermediary or other corporate vehicle), or if you are a partner of a partnership. It also applies to you if you are a person associated with a trust or pension vehicle (such as a trustee, settlor, protector or beneficiary).

This notice also applies to prospective customers and persons who have asked to receive our promotional or other material.

Where do we obtain personal data about you?

We collect personal data via our account application process and throughout our relationship with you.

We may also collect personal data you provide via our website, or when you complete an online enquiry form.

We may also obtain some personal data from third parties, including:

- An existing client, such as an individual or institutional client or prospective client you are associated with
- Fraud prevention agencies, professional background checking entities, international sanctions lists or any public databases or data sources.

What personal data do we collect about you?

The personal data we collect and use about you will differ depending on our relationship with you and the products and services you have selected. This may include:

- Personal details: name, address, contact details, age/date of birth, tax ID, national insurance number, employment details
- Due diligence documents: copies of your ID documents (e.g. passport or driving license) proof of address documents (e.g. bank statement or utility bill)
- Use of service: records of transactions, investment information
- Financial information: bank details, details on your assets and liabilities
- Telephone recordings
- Information obtained through our use of cookies, including IP address and browsing history
- Marketing and communication preferences.

Special category data and criminal conviction information

During the course of our relationship, we may collect sensitive personal information about you. This may include:

- Information about your health, including your mental health, which may be relevant to our provision of services to you
- Biometric data to process electronic identify checks.

For certain information, we may require your consent to process it. Where we ask for your consent and you do not give it, this may limit our ability to provide products and services to you.

To meet our regulatory requirements, we may also collect information relating to criminal convictions obtained from our sanction screening checks.

How do we use your personal data?

We will only use your personal data where we have a lawful basis. These lawful bases include where we need to process that data to:

- Perform our contract with you (e.g. deliver our products and services)
- Meet our legal obligations (e.g. to conduct identify checks and meet tax reporting and other regulatory obligations)
- Where you have given your consent (e.g. for direct marketing purposes)
- Where we have a legitimate interest (e.g. monitoring to ensure you are receiving an appropriate service or sending information related to similar products or services).

Profiling

We may use information about you, including your behaviours and characteristics, to tell you about other services and products that we think you might be interested in. This may include automated processing of your personal information ('profiling') to better understand your needs and help us improve our products and services.

Whilst we may use software to help us process this information more efficiently, this does not involve automated decision-making and there will always be human involvement in the decision-making process.

How long do we keep personal data?

We keep your personal data for as long as is required in order to fulfil our contractual, regulatory or legal obligations. We may also retain personal data to establish, exercise or defend any legal claims and in order to protect and enforce CGWM's rights for as long as is reasonably necessary and any personal data may be disclosed to the Courts, regulators and/or other relevant authorities.

Where it may not be possible for technical reasons to delete your personal data, CGWM may use pseudonymisation techniques provided that pseudonymised data cannot be traced back to the data subject.

Who do we share your personal data with?

We may share your personal data with the following:

- Our counterparties (including banks, custodians, sub-custodians, brokers, settlement agents, stock exchanges)
- Providers of investment products or services, including providers of pensions, offshore bonds, onshore bonds, trusts, investment platforms, insurance products, fund administrators, SIPP administrators, issuers of securities or other such products or services. We may also be required to share information with the auditors appointed by the providers of such products or services
- Our IT providers and service providers in order to provide and maintain the provision of our services, including emergency support
- Our appointed auditors, accountants, lawyers, and other professional advisers, to the extent that they require access to the information to provide advice or perform their services to us
- Our insurers, including any re-insurers and our insurance brokers
- Fraud prevention agencies, screening agencies and other organisations to allow us to undertake relevant checks
- Potential new IT and service providers, including but not limited to potential new screening agencies, for the purposes of assessing the provider's offering
- The Financial Conduct Authority, Guernsey Financial Services Commission, Jersey Financial Services Commission or Isle of Man Financial Services Authority, depending on the jurisdiction where your account is administered
- The Information Commissioner's Office in the UK, the Office of the Data Protection Commissioner in Guernsey, the Office of the Information Commissioner in Jersey and the Isle of Man Information Commissioner, as applicable, or any relevant regulatory authority where they are entitled to require disclosure
- If required to do so to meet applicable law, the order of a Court or market rules and codes of practice applicable to the circumstances at the time
- Relevant authorities to investigate or prevent fraud or activities believed to be illegal or otherwise in breach of applicable law
- If tax regulations require us to collect information about tax residency, then in certain circumstances (including if we do not receive a valid self-certification from you), we may be obliged to share information about your account with the relevant tax, payments and customs authority, who may pass this on to tax authorities in other jurisdictions

- In the event that we sell or buy any business or assets, in which case we will disclose your personal information to the prospective seller or buyer of such business or assets
- Other companies within the Canaccord Genuity group
- If some or all of CGWM's assets are acquired by a third party, in which case personal information held by us about our clients may be one of the transferred assets
- We may share your contact details with market researchers so that they may contract you to gather feedback about our products and services. You may decline to participate in any such market research activities.

We will not sell your personal data to third parties and we will only share your data with third parties where this is permitted by law.

Where do we transfer your personal data?

Your personal information may need to be shared with our service providers, which may involve transferring it to countries outside the European Economic Area (EEA). Certain jurisdictions benefit from a European Commission adequacy decision. Where no such adequacy decision exists, we will ensure that we do this in accordance with current data protection legislation. Such transfers are permitted where it is required for the performance of our contract with you or where we have your consent to transfer it. Where possible, we will use model clauses which have been approved by the European Commission or other available safeguards.

Marketing and communications

If you agree, we may send you information about new products and services, including those of other companies in the Canaccord Genuity group which may be of interest to you and which do not relate to the products or services which you currently receive from us. If you have consented to receive marketing, you may still opt out at a later date.

We may use your contact details to send you invitations to events and investment commentaries, updates or other communications which are relevant to the products or services which you receive from CGWM and which are considered to be part of the service which we offer you. We may also invite you to participate in satisfaction surveys so that we can ensure that our services meet your expectations.

You have the right at any time to stop us from contacting you for marketing purposes and to opt out of other communications. If you no longer wish to be contacted for marketing purposes or you wish to opt out of other communications which you receive as part of your service, please use the unsubscribe

button on each communication, or email us at marketing@canaccord.com or write to us using the details at the end of this notice.

Cookies

We use cookies on our website. Some of these cookies are necessary, for example, to maintain the security of the system or to ensure that we do not offer you access to products or services which are not available in your jurisdiction. Some of these cookies are optional and are used to enhance the user experience, for example, to remember that you have accepted our terms and conditions and to remember your selected jurisdiction and client preferences upon re-entry to our website. We also use Google Analytics cookies to help us improve your experience by collecting and reporting information on how you use our website. The cookies collect information in a way which does not directly identify anyone. You may turn off optional cookies on your browser but please be aware that parts of the site will not function correctly if you disable cookies.

For more information regarding our use of cookies, please see our Cookie Policy, which may be viewed on our website.

Your rights

You have certain rights in respect of the data we hold relating to you. These include:

- The right of access to the information we hold about you
- The right to be informed about how and why we use your data
- The right to update or correct your personal information (right to rectification)
- The right to delete your information
- The right to portability of your data.

In some circumstances you also have the right to:

- Object to processing
- Object to profiling.

The application of these rights vary according to the legal basis used to process your data. In certain circumstances we are required to retain copies of information we hold about you by other regulations. In this instance we will not be able to erase or modify the data.

Exercising your rights

In order to exercise these rights or if you have any concerns about our use of your personal information, please contact us using the information at the end of this notice. You can also contact the Information Commissioner's Office in the UK and the Office of the Data Protection Commissioner in Guernsey, the Office of the Information Commissioner in Jersey and the Isle of Man Information Commissioner, as applicable.

Further information

Further information on your data protection rights can be found on the Information Commissioner's website in the UK the Office of the Data Protection Commissioner in Guernsey, the Office of the Information Commissioner in Jersey and the Isle of Man Information Commissioner, as applicable.

Security

We take our responsibility to look after your personal information seriously and have implemented appropriate measures to keep your personal data secure and confidential. We regularly review our security controls and policies to ensure we protect your personal information.

Internet communication, which includes email, is not secure. We cannot accept any responsibility for unauthorised access by a third party or for the loss, theft or modification of data while it is being sent to us by email. For security purposes we may monitor emails received or issued by us.

Changes to our privacy notice

We keep our privacy notice under regular review. This privacy notice was last updated in January 2024. We reserve the right to update this privacy notice at any time and we will advise you when we make any substantial update to it.

How to contact us

If you have any questions about our privacy notice or the personal data we hold about you please contact us by emailing us at marketing@canaccord.com.

If you would like to write to us, our address is:

Company Secretary
Canaccord Genuity Wealth Limited
CG Wealth Planning Limited
Canaccord Genuity Asset
Management Limited
88 Wood Street
London EC2V 7QR

Company Secretary
Canaccord Genuity Wealth
(International) Limited
Trafalgar Court
Admiral Park
St. Peter Port
Guernsey GY1 2JA

How to contact our data protection regulators

If you are not satisfied with our response and would like to complain, or raise a concern, you can contact our data protection regulators:

UK

The Information Commissioner's Office (ICO)
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Tel: 0303 123 1113
<https://ico.org.uk/>

Guernsey

The Office of the Data Protection Authority
Block A
Lefebvre Court
Lefebvre Street
St Peter Port
GY1 2JP

Tel: +44 1481 742074
<https://www.odpa.gg/>

Isle of Man

Information Commissioner
First floor, Prospect House
Prospect Hill
Douglas
IM1 1ET

Tel: +44 1624 693260
<https://www.inforights.im/>

Jersey

Jersey Office of the Information Commissioner
Office of the Information Commissioner
2nd Floor, 5 Castle Street
St Helier
Jersey
JE2 3BT

Tel: +44 1534 716530
<https://jerseyoic.org/>