



**SGFG**

**PRIVACY POLICY**

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## **Introduction**

SGFG respects your privacy and is committed to protecting your personal data. This privacy policy will inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you.

### **1. IMPORTANT INFORMATION AND WHO WE ARE**

### **2. THE DATA WE COLLECT ABOUT YOU**

### **3. HOW IS YOUR PERSONAL DATA COLLECTED?**

### **4. HOW WE USE YOUR PERSONAL DATA**

### **5. DISCLOSURES OF YOUR PERSONAL DATA**

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#### **1. Important information and who we are**

##### **Purpose of this privacy policy**

This privacy policy aims to give you information on how SGFG collects and processes your personal data through your use of this website, including any data you may provide through this website when you purchase a product or service.

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

It is important that you read this privacy policy together with any other privacy policy or fair processing policy we may provide on specific occasions 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 policy supplements other notices and privacy policies and is not intended to override them.

## Controller

SGFG is made up of different legal entities, details of which can be found here: <https://sgfg.com/services>. This privacy policy is issued on behalf of all legal entities which comprise SGFG so when we refer to SGFG, "we", "us" or "our" in this privacy policy, we are referring to the relevant legal entity responsible for processing your data. SGFG is the controller and responsible for this website.

We have appointed a data protection officer (DPO) who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact the DPO using the details set out below.

## Contact details

If you have any questions about this privacy policy or our privacy practices, please contact our DPO in the following ways:

Full name of legal entity: SGFG Ltd Email

address: [dpo@sgfg.com](mailto:dpo@sgfg.com)

Postal address: 6 Arlington Street, 2<sup>nd</sup> Floor, London, England, SW1A 1RA

## Changes to the privacy policy and your duty to inform us of changes

We keep our privacy policy under regular review.

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 policy of every website you visit.

## 2. 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, maiden name, last name, username or similar identifier, marital status, title, date of birth, gender, nationality and national identity number(s).
- **Contact Data** includes billing address, delivery address, email address and telephone numbers.

- **Financial Data** includes bank account and/or account balance information, tax status, tax identification number, employment details, income and personal wealth.
- **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website.
- **Profile Data** includes your username and password, purchases or orders made by you, your interests and preferences.
- **Usage Data** includes information about how you use our website, products or services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

### **If you fail to provide personal data**

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

### **3. 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 your Identity and Contact data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
  - Use our services or publications;
  - request that marketing materials be sent to you; or
  - give us some feedback via email.
- **Automated technologies or interactions.** As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies.
- **Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources, including Technical Data from analytics.

#### 4. How we use 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 interests; or
- Where we need to comply with a legal or regulatory obligation.

Generally, we do not rely on consent as a legal basis for processing your personal data although we will get your consent before sending third party direct marketing communications to you via email. You have the right to withdraw consent to marketing at any time by contacting us.

#### Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground if the data is used for several purposes. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To manage our relationship with you, which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a survey	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how clients use our services)
To administer and protect our business and our website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganization or group restructuring exercise) (b) Necessary to comply with a legal obligation
To deliver relevant website content and marketing materials to you and to measure or understand the effectiveness of	(a) Identity (b) Contact (c) Profile	Necessary for our legitimate interests (to study how clients use our services, to develop them, to grow our business and to inform our marketing strategy).

the information we provide to you	(d) Usage (e) Marketing and Communications (f) Technical	
To use data analytics to improve our website, services, marketing, relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of users for our services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile	Necessary for our legitimate interests (to develop our services and grow our business)

Where we rely on legitimate interests as a lawful basis, we will carry out a balancing test to ensure that your interests, rights and freedoms do not override our legitimate interests. If you want further information on the balancing test we have carried out, you can request this from us by contacting us.

If you do not wish to provide us with your personal data and processing such data is necessary for the performance of a contract with you, we may not be able to perform our obligations under the contract between us.

### **Opting out**

You may ask us to stop sending you marketing messages at any time by managing your subscriptions, by checking or unchecking relevant boxes to adjust your marketing preferences or by contacting us at any time.

### **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 wish to get 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.

## **5. Disclosures of your personal data**

We may share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above.

- **Internal Third Parties**

- Other entities which form part of SGFG acting as joint controllers or processors and who are based within the EU and provide IT and system administration services and undertake leadership reporting;
- **External Third Parties**
  - Service providers acting as processors based in countries within the European Economic Area (EEA) and EU who provide IT security and system administration services.
  - Professional advisers acting as processors or joint controllers, including lawyers, bankers, auditors and insurers based in countries within the EEA and EU who provide consultancy, banking, legal, insurance and accountingservices.
  - Regulators and other authorities acting as processors or joint controllers based in countries within the EEA and EU who require reporting of processing activities in certain circumstances.
  - Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

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 instructions.

## **6. International transfers**

We share your personal data within SGFG group companies or affiliates. This will involve transferring your data outside the EEA.

Many of our external third parties are based outside the EEA so their processing of your personal data will involve a transfer of data outside the EEA.

Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to such data by using standard data protection clauses approved by the European Commission (as permitted under Article 46(2)(c)) that are designed to help safeguard your privacy rights. For further details, see European Commission: Model Contracts for the Transfer of Personal Data to Third Countries

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

## **7. 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. In addition, 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 established procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

## **8. 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 for which we collected it, including for the purposes of satisfying any legal, accounting or reporting requirements.

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.

### **Your Legal Rights**

Subject to certain limitations, you have rights under data protection laws in relation to your personal data. These rights include the rights to:

- **Request access to your personal data** (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it. Note that we may refuse to comply with a request for access if the request is manifestly unfounded, excessive or repetitive in nature.
- **Request correction of your personal data.** This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us. Note that we may refuse to comply with a request for correction if the request is manifestly unfounded, excessive or repetitive in nature.
- **Request erasure of your personal data.** This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note that we may refuse a request for erasure, for example, where the processing is necessary to comply with a legal obligation or necessary for the establishment, exercise or defense of legal claims.
- **Request restriction of processing your personal data.** This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful, but you do not want us to erase it; (c) where you need us to hold the data, even if we no longer require it, as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data, but we need to verify whether we have overriding legitimate grounds to use it. Note that we may refuse to comply with a request for restriction if the request is manifestly unfounded, excessive or repetitive in nature.

- **Request transfer of your personal data.** We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies where your personal data is processed by us with your consent or for the performance of a contract, and when processing is carried out by automated means.
- **Right to withdraw consent.** You can withdraw your consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent.
- **Right to make a complaint.** If you would like to put in a complaint of how we process your personal data, please complete the Data Subject Complaint Form.

### **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 mentioned above). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could 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 could 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.

## **9. Glossary**

### **CONTROLLER**

A data controller is a natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data.

### **PROCESSOR**

A data processor is a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.

## EEA

European Economic Area; the EU countries and also Iceland, Liechtenstein and Norway. The EU countries are: Austria, Belgium, Bulgaria, Croatia, Republic of Cyprus, Czech Republic, Denmark, Estonia, Finland, France, Germany, Greece, Hungary, Ireland, Italy, Latvia, Lithuania, Luxembourg, Malta, Netherlands, Poland, Portugal, Romania, Slovakia, Slovenia, Spain, Sweden and the UK.

## LEGITIMATE INTEREST

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

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.

## COMPLIANCE

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