

## **Privacy and cookies policy**

### **Privacy Statement**

#### **Your data controller**

This Privacy Statement relates solely to information supplied by you to us via this website. Threadneedle Asset Management Holdings Limited registered in England and Wales under company number 03554212 and whose registered office is at Cannon Place, 78 Cannon Street, London EC4N 6AG ("Threadneedle"). Any reference to Threadneedle shall also include reference to or any of the Threadneedle group of companies including its holding companies, subsidiaries and affiliates. For the purposes of the UK Data Protection Act 1998 ("DPA"), the data controller in respect of any personal information provided is Threadneedle Asset Management Holdings Limited. In this privacy statement "we", "us" and "our" means Threadneedle. We shall respect the privacy of your personal information, treat it as confidential and keep it secure, subject to the provision of the DPA and related and/or subsequent rule law and/or legislation.

#### **Uses made of your personal information**

The type of information you consent for us to collect, store and process about you are the personal data ("personal information") you supply to us through this website or otherwise any other additional personal information that you provide to us. This will typically include information such as your name, address, telephone number, email address, age, date of birth, gender, national insurance number, financial details and any other personal information that you provide to us. Please note that for certain products we may need to process sensitive personal data that you provide to us and references to personal information shall include references to your sensitive personal data.

The personal information that you provide to us will be used for a number of different purposes including but not limited to: understanding your financial needs; to conducting, and assisting any other third parties in conducting, (i) appropriate credit checks or (ii) reviewing credit worthiness; to manage and administer your account (including but not limited to contacting you), to update, correct and enhance our records; to offer you investment products and services (except where you have asked us not to do so) and to help us develop new ones; to contact you with details of changes to the products you have bought; to plan for, conduct and monitor our business; for internal analysis and research; to comply with legal or regulatory requirements including but not limited to any rule regulation law authority (such as by way of example only, for the purposes of debt collection and/or the prevention of fraud or any other crime) or any direction of any competent; and to identify you when you contact us. We may use external third parties to process your personal

information on our behalf in accordance with these purposes. Your personal data may be held in electronic, electro-magnetic and/or paper form.

### **Sharing of your personal information**

If applicable, where you have notified us of your adviser, the personal information provided may be shared with such adviser. You must notify us in writing if you no longer wish us to share your personal information with your adviser or of any change to your adviser. Your adviser should have its own arrangements with you about its use of your personal information. The personal information provided may also be shared with other organisations in order for us to comply with any legal or regulatory requirements. In addition, we may share your personal information with the companies within the Threadneedle group for the purposes set out in this privacy statement.

Additionally Threadneedle may communicate your personal information to such individuals and entities as are listed below, including but not limited to those parties for which you subsequently give us permission, or is under either a legal obligation or any other duty to do so. For the purposes detailed above, your information may be disclosed to:

1. any other branches or companies within the our group of companies;
2. any regulatory, supervisory, governmental or quasi-governmental authority with authority and jurisdiction over us;
3. any agent, contractor or third party service provider, professional adviser or any other person under a duty of confidentiality to us;
4. any credit reference agency and, in the event of default, any debt collection agency;
5. any actual or potential participant or sub-participant in, assignee, novatee or transferee of, our rights and/or obligations in relation to you; and,
6. any financial institution with which we have or proposes to have dealings

See also under 'Overseas transfers' below.

### **Consent to use and sharing**

In agreeing to this Privacy Policy and providing your personal information to us, you are consenting to us sharing your personal information with other organisations including any other company within the Threadneedle group of companies or otherwise use external third parties to process your personal information on our behalf, in order for us to comply with any legal or regulatory requirements and/or our obligations to your employer.

### **Business changes**

If we or the Threadneedle group undergoes a group reorganisation or is sold to a third party, the personal information provided to us may be transferred to that reorganised entity or third party and used for the purposes highlighted above.

### **Overseas transfers**

We may transfer your personal information to countries located outside of the European Economic Area (the EEA), this may happen when our servers, suppliers

and/or, service providers are based outside of the EEA. The data protection laws and other laws of these countries may not be as comprehensive as those that apply within the EEA - in these instances we will take steps to ensure that your privacy rights are respected. Details of the countries relevant to you will be provided upon request. By providing us with this information, you consent to these transfers and uses, and to any disclosure required by law.

For the purposes of this Privacy Statement where any disclosure of your personal information requires the transfer of your personal information to parties located in other countries we understand that such countries may not offer the same standard of data protection as the country where you live and work. However, Columbia Threadneedle shall ensure that those overseas third parties to whom your personal information is transferred, treat your personal information securely and confidentially. Threadneedle also fully intends to comply with all applicable data protection and privacy laws. Nevertheless we may transfer your information under certain circumstances, such as by way of examples only, where it is necessary to perform our contract with you. In providing details to us via this website you indicate your consent to any and all transfers including any transfers not specifically detailed above.

### **Access to/correction of your information**

With limited exceptions, you have the right to ask for a copy of the information that we hold on you. There may be a charge for this (if a charge is permitted). If any of the information that we hold about you is wrong, please tell us and we will put it right. You can write to us at Threadneedle Investment Services Limited, PO Box 10033, Chelmsford, Essex CM99 2AL.

Subject to any applicable local laws and regulations, if you prefer not to be kept informed of our products and services, please let us know.

### **Third Party Information**

If you provide us with information about another person, you confirm you already have explicit confirmation that such other person has appointed you to act for them to consent to the processing of their personal data by us. This means that you have informed them of our identity and the purpose for which their personal data will be processed, namely to verify their name and address and otherwise only in connection with you. You agree to keep us, and any Threadneedle group company or relevant third party fully indemnified for your not having complied with this paragraph.

### **Cookies**

A "cookie" is a small piece of encoded information sent by a web server to be stored on your web browser (Internet Explorer, Chrome, Firefox, Safari, etc ) so that it can remember something about you such as username, password, references at a later date. Cookies have three functions: security, log in and responsibility discharge.

A cookie also ensures that there is a unique identification when you visit the ColumbiaThreadneedle.com website and helps us to determine what page you may see next time you visit the website. This process enables us to provide you with personalised information and simplify your user experience.

We use persistent cookies that do not expire at the end of a user session. The cookie stored on your web browser does not contain any personal information and is encrypted and only our web server can read it.

Specifically cookies may:

1. allow us to recognise the PC you are using when you return to our website so that we can understand your interest in our website and tailor website content and advertisements to match your interests;
2. identify you after you have logged in by storing a temporary reference number in the cookie so that our web server can conduct a dialogue with you while simultaneously dealing with other customers. (Your browser keeps this type of cookie until you log off or close down your browser when these types of cookie are normally deleted. No other information is stored in this type of cookie);
3. allow you to carry information across pages of our website and avoid having to re-enter that information;
4. allow you access to stored information if you register for any of our on-line services;
5. enable us to produce statistical information (anonymous) which helps us to improve the structure and content of our website; and/or,
6. enable us to evaluate the effectiveness of our advertising and promotions.

To learn more about cookies and how to manage them, visit [aboutcookies.org](http://aboutcookies.org).

### **Our use of cookies**

On our website we use cookies to improve our service and to help manage your visit. The list below shows all of the cookies that are set by this website and third-party services we use.

### **Cookies for improving service**

Google Analytics sets cookies to help us accurately estimate the number of visitors to the website, what pages you visit, how long you are on the site, how you got here and what you click on. We use this to improve the user experience. We do not collect or store your personal information (e.g. your name or address) so this information cannot be used to identify who you are.

The following cookies are set by Google Analytics:

Name	Typical Content and Description	Expires
_utma	Randomly generated number This cookie keeps track of the number of times a visitor has been to the site, when their first visit was, and when their last visit occurred.	2 years
_utmb	Randomly generated number This cookie takes a timestamp of the exact moment in time when a visitor enters a site.	30 minutes
_utmc	Randomly generated number This cookie takes a timestamp of the exact moment in time when a visitor leaves a site.	When you close your browser
_utmz	Randomly generated number and information on how the site was reached (e.g. direct or via a link, organic search or paid search). This cookie keeps track of where the visitor came from, what search engine you used, what link you clicked on, what keyword you used, and where they were in the world when you accessed our website.	6 months

It's possible to opt out of have your browsing activity within sites recorded by Google Analytics. Find out how to opt out of Google Analytics - <http://tools.google.com/dlpage/gaoptout>.

### Cookies for managing your visit

We use a number of cookies to remember your selections and preferences that you've made when looking at the information on this site. These cookies inform us whether you're a returning visitor, whether you have accepted our disclaimer and website terms and conditions, what investor type you are and what's your language preference. The following cookies are set by us:

Name	Typical Content	Expires
ASP.NET_SessionId	Randomly generated number	When you close your browser
UserContext	Randomly generated number	When you close your browser
culture	Dependant on your language preference: en-GB, fr-FR, de-DE, it-IT, es-ES, NL-nl or pt-PT	1 year
Global-disclaimer	Accepted	1 year
private-disclaimer	Accepted	1 year
Intermediary-disclaimer	Accepted	1 year
Institutional-disclaimer	Accepted	1 year
Distribution partner-disclaimer	Accepted	1 year
Investor type	Dependant on your investor type preference: private, intermediary, institutional or distribution partner	1 year

## **Turning off Cookies**

If you do not wish to have a cookie stored on your computer, you should disable them in your browsers security options using your browsers anonymous usage setting (called "Incognito" in Chrome, "InPrivate" for Internet Explorer, "Private Browsing" in Firefox and Safari etc.). If you do this we will not place cookies on your computer. Please note that by deleting our cookies or disabling future cookies you may not be able to access certain areas or features of our site and the site will not work as well as if you had permitted our use of cookies.

## **Consent**

In order to access our website you have to agree to our cookies policy set out above. This means that when you consent to our terms of use, you consent to our cookies policy. If you do not turn off cookies, then your consent to our terms of use further confirms your consent to downloading our cookies.