



Saga Share Direct Privacy Policy

Saga Share Direct is provided by Equiniti Financial Services Limited

Important information

We think it is important that you know what information we collect about you and how we use it.

This policy sets out full details of the information we collect about you and how we use it. Please read this policy carefully. By using our Website, contacting us by telephone, e-mailing us or otherwise providing information to us, you agree to its terms.

We've included some links to other websites in this policy.

Please note that these websites are controlled by other people, not us, and we are not responsible for them.

Definitions used in this privacy policy

Account – a Saga Share Direct Certificated Trading account

CREST – the centralised system for settlement of securities for the United Kingdom and Ireland operated by Euroclear UK & Ireland Limited.

Data Controller – an individual, company or other organisation who determines how and for what purpose Personal Data is processed. We act as a Data Controller when processing Personal Data relating to our customers.

Data Processor – any person or organisation which processes Personal Data on behalf of a Data Controller (except for an employee of the Data Controller).

Data Subject – a person who is the subject of Personal Data. If you are one of our customers, you are a Data Subject and we are responsible for processing your Personal Data.

EEA – European Economic Area.

General Terms and Conditions – the Certificated Terms and Conditions applying to customers.

Investments – the investments which you may purchase, sell or subscribe to for using our Services.

Personal Data – data which relates to a living person, who can be identified from the contents of that data, or from that data when it is combined with information which is in or is likely to come into the possession of the Data Controller, and includes any expression of opinion about the individual and any indication of the intentions of the data controller or any other person in respect of the individual.

Saga – Acromas Financial Services Limited, a subsidiary company of Saga plc.

Saga Group – Saga plc and its subsidiaries from time to time. For full details please refer to Saga's privacy policy available at www.saga.co.uk/privacy-policy, or on request.

Service – the services we provide in accordance with the General Terms and Conditions available here.

Website – our website that appears at www.sagasharedirect.co.uk.

'we', 'us', 'our' – Equiniti Financial Services Limited.

'you' and 'your' – as the context requires, any person using the Website or any of our Services.

For ease of reading these words 'we', 'us', 'our', 'you' and 'your' are not shown in capitals.

1. How we may communicate with you

Equiniti Group will never issue any marketing material to you, but Saga may send marketing communications to you – see clause 6.2.

We will send information regarding your account, including changes to Terms and Conditions and contract notes, to you via post.

2. Security of communications

If you ever receive a communication from us that you are concerned may be from a third party impersonating one of our staff, please contact us

immediately. If you are ever concerned that the person calling may not be from us, you can always call us back on telephone number 0800 015 9278.

3. Our obligations under the Data Protection Act

We are obligated to comply with The Data Protection Act 1998 ('the Act') which regulates the processing of Personal Data. The Act seeks to protect your rights to your Personal Data by setting out, amongst other things, the conditions under which the processing of Personal Data is lawful, the rights of Data Subjects and the standards that organisations who deal with Personal Data must adopt.

4. What Personal Data do we collect?

Your information will only be used for the purposes set out in this policy.

Specifically, we collect:

- (a) all of the information you choose to submit to us including any information provided by you to us, when making an application or registering your interest for any of our Services, along with the information you send us in e-mails and text messages.
- (b) all of the information provided to us by third parties, such as information provided by your employer or organisations who enable us to carry out identity checks and/or other fraud prevention services;
- (c) information you provide to us in response to surveys or competitions;
- (d) information you send us on e-mail
- (e) information you give us when you contact us via the telephone;
- (f) information about the Services you use via our telephone service, including the time and date of purchase, the Services that you use and details of any relevant payment card (such as a debit card) you use;
- (g) information that you send to us as part of the 'know your client' compliance checks;
- (h) information on what you view, click on and access in and through e-mails and text messages (SMS or MMS), or Website. We may collect the time and geographic location of your device when you do so. For our Website, this information may also include where you came to our Website from, and where you went when you left it. We also track how often you visit and use our Website. We do this through the use of e-mail and website cookies. We make cookie policies available on each of our Websites to give you more detailed information on how we use them; and
- (i) information collected independently by online advertising networks (for example Google) through whom Saga place advertisements. The information we obtain varies from network to network. It often summarises the actions of lots of people, and so does not enable us to identify you individually. It relates to what you view, click on, and access through websites in their network, including the subject matter of the website you started at and where you subsequently go. It may also include their analysis of your behaviour across the wider internet and a profile of you. If you are unhappy about this happening you should look out for 'settings' and 'Do Not Track' options in online advertisements and in the privacy and cookies functionality on your devices and consider changing your settings to block third party cookies in particular. We do not control the

information on you that such networks obtain, or the technology they use to do so.

- (j) The information you give us in your application form or other related documents or your use of our Services, may contain your or another person's Personal Data. If you provide us with information about another person, you confirm that they have appointed you to act for them, they consent to you providing their Personal Data to us and any processing of their Personal Data and that you have informed them of our identity and the purpose (as set out below) for which their Personal Data will be processed (as set out in this policy).

5. How do we use your Personal Data?

The Purposes for which we may process your Personal Data include:

- (a) providing our Services to you;
- (b) where you have requested a service from third-party providers, introducing you to third-party providers and sharing your Personal Data with such third-party providers, (e.g. a third party who will store your payment card details where you have opted to store those details with us) for this purpose;
- (c) we will pass onto Saga your name, address, e-mail address, telephone number and trading activity for research purposes;
- (d) the compliance with a request you make of us;
- (e) verification of identity checks and bank details, including use of the services of a credit reference agency or fraud prevention agencies;
- (f) the transfer of information to the Official Receiver or appointed insolvency practitioner(s) for the administration of your Account, if we receive notice of or are informed of your insolvency or bankruptcy, or of any insolvency proceedings/arrangements;
- (g) enforcing or obtaining settlement of debts owed to us or in relation to investments made on your behalf, including sharing your information with any debt collection, debt tracing or other agent for these purposes;
- (h) any use of your Personal Data to comply with legal or regulatory obligations, including disclosing Personal Data to a third party if we are required (or reasonably believe we are required) to do so by law, or if we are requested to disclose information to the Financial Conduct Authority, HM Revenue & Customs or any other regulatory or fiscal authority in any country, the London Stock Exchange plc and ICAP or the operator of any market on which you may hold investments;
- (i) sharing with HM Revenue & Customs and/or any domestic and/or any foreign tax authority any information or documentation that you have provided to us with respect to your liability to tax in any jurisdiction (both within the UK and, if applicable, internationally) and/or in response to requests from such authorities;
- (j) where you have requested to take part in an Initial Public Offering (IPO), retail Bond offering, any similar offering, or hold any investment, we may provide such information relating to your request or holding as may be reasonably requested by the issuer of that investment, or any managers acting on their behalf, in connection with the offer or issue of that investment;
- (k) to provide you with our Website, which requires a certain amount of technical information to be collected in order to work properly;

- (l) to gather feedback from you about our products, Website, other services and activities from time to time. We may invite you to provide this feedback on occasion, for example by e-mailing you to ask you if you would like to review a product you have bought or a service you have used. We may use independent research and feedback providers to do so on our behalf;
- (m) to respond to any questions, suggestions, issues or complaints you have raised with us;
- (n) to communicate with you about operational changes to our products, services, Website, for example if we were to withdraw one of our products, or change this privacy policy;
- (o) to gather statistics about how you and other people use our Website, offers, news, product information, competitions, sponsored events, social media and other digital content. We then analyse these statistics to understand if these things appear interesting and meet most people's needs, or if they should be improved, and if so, what design or other changes (e.g. around the nature and timing of communications) would be most beneficial both for our customers, and for our business;
- (p) to make national declarations which we have to provide to CREST for onward transmission to the registrar;
- (q) to monitor use of our Website to see if they are being abused or threatened for example by people posting inappropriate comments on our community boards or by potential hackers looking to undermine their security;
- (r) to protect you and our business against any other potential criminal behaviour, including potential identity theft and fraud;
- (s) to maintain administrative and statutory records about our business to enable us to understand what we have sold, how, when, where and at what price and account to the tax authorities for the related taxes that we have to pay;
- (t) in the process of anonymising your information so that you are no longer identifiable to us; and
- (u) to test new systems and processes as we roll them out (but generally only in anonymous form to make sure they work and will meet the high expectations we set for ourselves).

6. Who do we share your information with?

- 6.1 In order to run our business and provide you with many of our products and services, we sometimes have to pass your information to other people and businesses as set out below.

We share the information we collect (where relevant) with:

- (a) all of our group companies, brands and business units that have relationships with our customers and users;
- (b) third-party service providers where this is necessary for the purpose of continuing to provide Services to you
- (c) other people and businesses who help us provide our Website, and related services to you, for example, information technology companies who design and host our Websites, and payment services companies who enable us to store details of and allow you to use payment cards with us;
- (d) our insurers and insurance brokers where required in order for us to be able to obtain insurance against risks we face in running our business. They may

retain this information for the purpose of ongoing risk assessment and insurance broking and underwriting services;

- (e) credit reference agencies and banks and finance companies (including TraceSmart and Experian) who provide antifraud and identity information to us. (Where we do so for anti-fraud purposes, the recipient organisation may hold your information on file for the purposes of their fraud prevention services in the future);
- (f) our professional advisers, for example our lawyers and technology consultants, when they need it to provide advice to us;
- (g) any successor to us as provider of share dealing services to Saga customers.

We also may share the information we collect where we are legally obliged to do so, for example to comply with a court order.

6.2 In addition to 6.1, we will also share information, including details of your assets and trades with Saga, and you agree:

- (a) Saga as part of the Saga Group of companies (details of which can be found in this Privacy Policy) will process your information for the purposes set out below including sharing with us for the specific purposes set out above;
- (b) they may use your information to contact you about offers and services which they believe may be of interest to you. Saga and Saga Group may provide you with information by post, telephone, fax, SMS or e-mail about products and services, unless you write to Saga: Information Processing at The Saga Building, Enbrook Park, Sandgate, Kent CT20 3SE to advise your communication preferences, or you make use of the regular opportunities that Saga provides you with to confirm which channels and products you do not wish to use or hear about. Saga will keep your information secure and will use your information to assess business performance, for administration purposes, for statistical analysis, to carry out research, and for marketing purposes.

7. Social media, blogs, reviews, and similar services

Any social media posts or comments you make to us (e.g. on our own Facebook page) will be shared under the terms of the relevant social media platform (e.g. Facebook or Twitter) on which they are made and could be made public by that platform. These platforms are controlled by other organisations and so we are not responsible for this sharing. You should review the terms and conditions and privacy policies of the social media platforms you use to ensure you understand how they will use your information, what information relating to you they will place in the public domain and how you can stop them from doing so if you are unhappy about it.

Any blog, review or other posts or comments you make about us, our products and Services on any of our blog, review or user community services will be shared with all other members of that service and the public at large. You are responsible for ensuring that any comments you make comply with any relevant policy on acceptable use of those services.

8. Security of your information

Much of the information we receive is provided electronically, originating with your relevant device and then transmitted to us by your relevant telecoms network provider.

Where it is within our control, we put measures in place to ensure that whilst the data is in transmission

from your device to us, this data is reasonably secure. Once your information is received by us, we take its security very seriously.

We use appropriate procedures and technical security measures (including strict encryption, anonymisation and archiving techniques) to safeguard your information across all our computer systems, networks, websites, offices and stores as much as possible. In particular, our Information Security policy set is aligned to ISO027001, which is an internationally recognised security standard.

We also use secure means to communicate with you where appropriate, such as 'https' and other security and encryption protocols.

If you have any concerns about the security of your own personal computers and mobile devices, we suggest you read the advice of 'Get Safe Online', which can be accessed at www.getsafeonline.org.

Transfer of Personal Data outside of the EEA

Although we are a business based in the UK, it may be necessary in providing the Services to you, for your Personal Data to be processed in countries outside the EEA which may not have the same data protection laws as the United Kingdom or other countries in the EEA. In the event it is necessary for us to transfer your Personal Data outside the EEA in order to provide the Services to you we will ensure adequate safeguards are in place to protect your Personal Data before making the transfer, and will not transfer Personal Data if we cannot be sure it is sufficiently protected. Please note that information protection laws do vary from country to country. In particular, the law of the country in which you are resident or domiciled may offer a higher standard of protection than the laws in the United Kingdom and/or those other countries in which we store and use the information we collect. Our transfer of information to other countries could result in that information being available to government and other authorities in those countries under their laws. By using our Services you agree to this international transfer, storing and processing.

9. How long we may hold Personal Data for

Personal Data will not be retained for longer than necessary for us to achieve the purpose for which we obtained that data. In addition, we are required by law or by rules made by the Financial Conduct Authority to retain certain types of information for specified time periods.

We will then either securely delete it or anonymise it so that it cannot be linked back to you.

10. Managing your information and subject access requests

You can contact us to discuss your information at any point in time using the details provided below. It is very important to us that all the information we hold about you remains accurate and up-to-date at all times to reduce the chances of us having a misunderstanding. We try hard to make sure this is the case at all times regardless of what information we hold about you. We need your help in doing so though. If you have an account with us, please ensure that the information you provide to us through that account (e.g. any contact information you provide) remains accurate and up-to-date. Please review and update it regularly.

If you have reason to believe any of the information we collect on you may be inaccurate, and you cannot correct such inaccuracy yourself through your registered accounts with us, please contact us (see below for how to do this).

You have certain rights under the Act in relation to your Personal Data, known as subject access rights. These rights include, but are not limited to, the right to request a copy of the Personal Data held about you by both Saga and us in accordance with the Data Protection Act 1998 and if any details are inaccurate you can request to have them changed. Please be advised that you may be charged £10 for a copy of your data. For more details please write to:

The Data Protection Co-ordinator, Saga Share Direct, PO Box 4956 Aspect House Spencer Road LANCING BN99 8PL

Please quote your Saga Share Direct customer reference.

In addition to subject access, you can ask us to have one of our staff review a decision about you which has been taken automatically by computer. One common example is if we decline an order you place with us online for anti-fraud or credit check reasons. Please note that these decisions can come about due to policy decisions taken by banks, card and payment processing companies, and credit reference agencies who separately hold information about you and to resolve them you may have to speak to them directly.

Whilst your country of residence or domicile may grant you other legal rights over the information we collect from you and your devices, this service is designed for UK residents and, therefore, we will only adhere to and be bound by the UK Data Protection Act 1998 and any subsequent revisions to this.

We reserve the right to charge you a small administration fee to meet our costs in honouring your legal rights, where permitted by the relevant law.

We reserve the right not to comply with any requests we receive where we may lawfully do so, for example if we reasonably believe a request to be malicious, technically very onerous, to involve disproportionate effort or be harmful to the rights of others.

If you have any complaints about our use of your information, please contact us. We will do our very best to resolve any complaint to your satisfaction. If, for whatever reason, you feel we do not meet the high standards we expect of ourselves, you have a right to complain to the UK Information Commissioner's Office (or 'ICO').

11. Monitoring

For quality control, training, security and regulatory purposes, we may monitor and/or record your communications with us.

12. Updates to this privacy policy

We review our use of your information regularly. In doing so, we may change what we collect, how we keep it and what we will do with it.

As a result, we will need to change this policy from time to time to keep it accurate and up to date. If we change this policy, we will endeavour to tell you about it. That way you can check to see if you are happy with our policy, before proceeding any further. Please look out for notices from us.

If, following any changes, you continue to use our Service, contact us by telephone or otherwise provide information to us (for example through our stores or social media) we will take it that you agree to those changes.

13. About us

Our full legal name is Equiniti Financial Services Limited. We are a private limited company incorporated in England and Wales. Our registered company number is 6208699 and our registered address is Aspect House, Spencer Road, Lancing, West Sussex, BN99 6DA. Our VAT number is GB915967778. Equiniti Financial Services Limited is authorised and regulated by the Financial Conduct Authority or any successor to it ('FCA'). Our FCA registration number is 468631. Our data protection registration number is Z1028420.

14. Where to get further information about your privacy rights

The ICO regulates data protection and privacy matters in the UK.

They make a lot of information available to consumers on their website http://ico.org.uk/for_the_public.

They make the registered details of all data controllers such as Equiniti available publicly. You can access them here: <http://ico.org.uk/esdwebpages/search>

You can make a complaint to the ICO about our use of your information at any time. As mentioned above, please consider raising any issue or complaint you have with us first though.

Your satisfaction is very important to us, and we strive to solve all problems and complaints wherever possible.

15. Contact us

If you want any further information about our use of your information, our Website or have any other privacy questions relating to us, we'd be happy to help you. Our contact details are:

Tel: 0800 015 9278. (Monday – Friday 8am to 6pm)

E-mail: certificatedenquiries@sagasharedirect.co.uk

Post: Saga Share Direct, PO Box 4956, Aspect House, Spencer Road, LANCING BN99 8PL

Last revision date: October 2015