

Data Protection

Introduction

This Privacy Notice explains how we use your personal information, describes the categories of personal information we process and for what purposes. We take your privacy seriously and we are committed to collecting and using your information fairly and in accordance with the requirements of all applicable data protection and privacy laws.

This Privacy Notice may be updated from time to time. We will inform you if material changes are made either to the Privacy Notice or to the way that we process your data.

Who we are and how to contact us

Handelsbanken ACD Limited ("ACD") is the controller responsible for your personal data. ACD is authorised and regulated by the Financial Conduct Authority ("FCA"). ACD is a wholly-owned subsidiary of Handelsbanken Wealth & Asset Management Limited ("HWAM"). HWAM is a wholly-owned subsidiary of Handelsbanken plc. Each of ACD and HWAM is authorised and regulated by the FCA. Handelsbanken plc is authorised by the Prudential Regulation Authority ("PRA") and regulated by the PRA and the FCA. When we mention "we", "us" or "our" in this Privacy Notice, we refer to the relevant company responsible for processing your data. Further information can be found on wealthandasset.handelsbanken.co.uk.

Our Data Protection Officer can be contacted at No.1 Kingsway, London, WC2B 6AN or at dpo.hwam@handelsbanken.co.uk if you have queries about this Privacy Notice or wish to exercise any of the rights mentioned in it.

What kinds of personal information do we hold about you?

In order to fulfil our obligations to you as our customer, we handle different types of personal information about you. We organise your personal information into the following categories:

Categories of personal information	Description (examples)
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<p>Basic personal information</p>	<ul style="list-style-type: none"> • Title and full name • Your personal description or photographic identification • Contact details, including: your home address, any other contact address, your address history, home and mobile telephone numbers and email. • Your date of birth • UK National Insurance number • Information on your nationality and citizenship
<p>Personal preferences</p>	<ul style="list-style-type: none"> • How you wish to be contacted • Marketing preferences • Acceptance of cookies
<p>Communication</p>	<ul style="list-style-type: none"> • A record of your communications with us, including the recording of all telephone calls with us
<p>Financial transactions</p>	<ul style="list-style-type: none"> • Bank account and sort code details • Details of third parties we may be asked to make payments to
<p>Financial details</p>	<ul style="list-style-type: none"> • Your banking details • Credit or debit card information or other payment or financial information • information about transactions you make in relation to a fund including your holding in a fund or the reference number in relation to your holding

<p>Special categories of personal data</p>	<ul style="list-style-type: none"> • Special category data includes: personal data revealing racial or ethnic origin; political opinions; religious or philosophical beliefs; trade union membership; genetic data; biometric data (where used for identification purposes); data concerning health; data concerning a person's sex life; and data concerning a person's sexual orientation • We will collect information about your gender and your marital status
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Information about other individuals

If you make a joint application, for example with your spouse, partner or family member, we will also collect the personal information mentioned above about that person. You must show this Privacy Notice to all applicants and ensure they confirm that they know you will share it with us for the purposes described in it.

If there is somebody who has power of attorney over your affairs or has authority to give us instructions, that person will see this Privacy Notice when we make contact with him/her directly.

We will generally collect your personal information from you directly via our agreement with you and our application process. We will also collect and record information about you obtained during telephone conversations, meetings and other correspondence such as emails and letters.

We also obtain your personal information from other sources such as:

- other third parties you have authorised us to correspond with; or
- other organisations, to assist in prevention and detection of crime.

In addition, some of your personal information may come from Handelsbanken plc or HWAM if you already have an account or product with them.

How we use your personal information

We only use your personal information where it is fair and lawful to do so. This section explains our legal grounds for collecting and using information about you.

<p>Grounds for collecting and using information about you</p>	<p>Information collected</p>
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<p>You have given us your consent</p>	<ul style="list-style-type: none"> We only rely on your consent for collecting special categories of information (described earlier above) when it is relevant
<p>It is necessary to fulfil our contract with you</p>	<ul style="list-style-type: none"> This includes the information we need to provide you with a product or service, for example, in relation to personal data of investors or prospective investors in a fund (referred to in this notice as “investor data”): to open accounts, or to process subscriptions, redemptions, exchanges and payments of dividends, as relevant
<p>It is in our legitimate interest</p>	<ul style="list-style-type: none"> We may use your information where it is in our legitimate interest to do so. For example, using your information to send you publications or other marketing literature; or using your information in relation to the proper management and administration of your investment and the operation the fund by us, our delegates and the service providers to the funds.
<p>It is necessary to fulfil our legal and regulatory requirements</p>	<ul style="list-style-type: none"> We also use your personal information to meet our regulatory and legal requirements. For example, to notify you about changes to a fund; or meeting our anti money laundering obligations, or recording and monitoring telephone calls for example, in order to process or verify instructions.

How you can withdraw your consent

Where we do rely on your consent and you have given us this, you have the right to withdraw this and we will no longer collect and use this information. Please be aware that withdrawing your consent could mean that we cannot take into account all relevant information when providing our services to you.

In relation to investors or potential investors in a fund, you have the right to refuse to give us your personal data in which case we may at our discretion: refuse to issue shares or units in a fund to you; refuse to pay the proceeds of a redemption of shares or units; refuse to pay income on shares or units to you; or compulsorily redeem your holding.

If you do withdraw your consent, we may still be able to process some of the data that you have provided to us on other grounds and we will notify you of these at such time.

Who we share your personal information with

We will only share information with third parties where authorised to do so by you, to fulfil our contract with you, where there is a legal or regulatory requirement or if it is in our best legitimate interest to do so. This section covers who we share your information with and why. If you would like further details regarding who we share information with, please contact the Data Protection Officer.

Person/Organisation	Why
Other individuals involved in your agreement with us	<ul style="list-style-type: none">• Where you have instructed us to provide information to another individual or signatory of the agreement we will do this to fulfil our contract with you.• Where there is more than one signatory to an agreement such as in the case of joint accounts or accounts for trusts or corporate customers. We will provide your information to all signatories to fulfil our contract with you.
Other providers or third parties you may ask us to provide information to or request information from	<ul style="list-style-type: none">• Where we are dealing with third parties on your behalf we will ask for your authority to request information from them and, where necessary share information with them.
The Handelsbanken Group	<ul style="list-style-type: none">• We will share information with the wider group where it is in our legitimate interest to do so.
Supervisory Authorities and HMRC	<ul style="list-style-type: none">• We will share your information with regulatory authorities such as the FCA or the Information Commissioner's Office as required.

	<ul style="list-style-type: none"> We will also share information about you with HMRC as required.
<p>Other companies we have chosen to support us when providing services and products to you</p>	<ul style="list-style-type: none"> We share information with a limited number of third parties who support us in providing services to you and enable us to fulfil our contract with you and help us meet our legal or regulatory obligations. For example, we will share your name, address and date of birth with credit reference agencies to electronically verify your identity. We will also share your information with service providers, support services and organisations that help us market our services and third parties instructed by us to enable us to fulfil our contractual obligations. In relation to our funds, we may disclose investor data to the service providers to the funds, or to our own service providers, delegates, suppliers or our contractors and sub-contractors insofar as reasonably necessary for the purpose of the operation and administration of a fund, the distribution of a fund and the safe custody of the assets of a fund. In particular investor data may be provided to: (a) the registrar or administrator of a fund in relation to for example, on-boarding functions, anti-money laundering and other regulatory compliance checks, set-up of investor accounts, monitoring of trading activity and other record keeping obligations, subscriptions and redemptions of the shares or units of a fund, or to monitor changes to the investor register, (b) to the depositary or custodian of a fund in relation to their oversight or safe custody duties; and (c) to the investment manager of a fund in relation to the monitoring of a fund's investments.
<p>Analytics and search engine providers</p>	<ul style="list-style-type: none"> Firms that assist in the improvement and optimisation of the website on which we publish information about the funds (wealthandasset.handelsbanken.co.uk)

Our insurers and/or professional advisers	<ul style="list-style-type: none"> • Insofar as reasonably necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, obtaining professional advice, or the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure
Our auditors	<ul style="list-style-type: none"> • In relation to firm or fund audits
Our bank	<ul style="list-style-type: none"> • Including as permitted under applicable anti-money laundering or anti-terrorist financing laws
Law enforcement	<ul style="list-style-type: none"> • We share information with law enforcement agencies as required.

Transfers of your personal information outside of the UK or the EEA

We are based in the UK but sometimes we may need to transfer your personal information outside the UK or the European Economic Area (EEA). If it is processed within Europe or other parts of the EEA then it is protected by European data protection standards.

Some countries outside the EEA do have adequate protection for personal information under laws that apply to us. We will make sure that suitable safeguards are in place before we transfer your personal information to countries outside the EEA.

What should you do if your personal information changes?

You should tell us without delay so that we can update our records. You can contact your usual contact to do this. Alternatively, you can contact our Data Protection Officer.

Do you have to provide your personal information to us?

We are unable to provide you with any products or services without having personal information about you. Your personal information is required before you can enter into an agreement with us and is required during the life of that agreement.

How long we keep your personal information for

We will hold the majority of your personal information for a period of 10 years following the end of your contract with us, however there are some exceptions to this. If you would like further information about our data retention practices, contact our Data Protection Officer using the details set out above.

What are your rights under data protection laws?

You have a number of rights under data protection laws. They do not apply in all circumstances. For more information or if you wish to exercise any of them, please contact the Data Protection Officer.

Your data protection rights	Description
The right to be informed	<ul style="list-style-type: none">• We have to be transparent with you about the personal information we collect and how we use it. This is why we have a Privacy Notice.
The right to have your personal information corrected	<ul style="list-style-type: none">• If you believe any of your information is incorrect, wrong or incomplete we will take steps to check it and correct any factual inaccuracies
The right to object to processing of your personal information	<ul style="list-style-type: none">• You can object to our use of your personal information where we rely on legitimate interests (as described above).
The right to restrict processing of your personal information	<ul style="list-style-type: none">• You can ask us to stop using your personal information for certain reasons. In most cases we will still be able to keep your information but we will ensure that we do not use it in the future for the reasons you have restricted.

<p>The right to have your personal information deleted (also known as the “<i>right to be forgotten</i>”)</p>	<ul style="list-style-type: none"> • If we no longer need to keep your information you can ask us to delete it. We will do so if we have no legal, regulatory or compelling business reason to keep it.
<p>The right to request access to your personal information</p>	<ul style="list-style-type: none"> • You can ask us to provide you with a copy of the personal information that we hold about you.
<p>The right to port your personal information to another firm</p>	<ul style="list-style-type: none"> • If we hold your personal information electronically and use it with your consent or to fulfil our contractual obligation with you, you can ask us to transfer the data to another organisation in a safe and secure way and in a machine readable format.

Cookies

We may use cookies and other similar technologies on our website. Cookies are small text files that may be stored on your computer or mobile device when you visit a website. These technologies may do different things, such as letting you navigate between web pages efficiently and remembering your preferences. Our website provides further information on how and where we use cookies and how you can control them.

How to make a complaint

We aim to provide complete customer satisfaction but we also recognise that there may be a time when you feel that we haven't delivered and would like to make a complaint. If you think things have gone wrong and you are unhappy with us, please contact your usual contact or the Data Protection Officer in the first instance and they will try to assist you. More information on how to complain can be found on our website.

If you are still unhappy you have the right to complain to the Information Commissioner's Office which enforces data protection laws. Further details can be found on their website www.ico.org.uk.

