# How we use your information

This Privacy Notice explains how we use your personal information, describes how your personal information is categorised and explains your data protection rights and how to exercise them. We take your privacy seriously and only collect and use your information in accordance with the requirements of the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018 (DPA 2018) (together these form the 'Data Protection Legislation').

#### Who we are and how to contact us

Handelsbanken Wealth and Asset Management Limited is a subsidiary of Handelsbanken plc (Handelsbanken) and is part of the Handelsbanken group (Group) of companies and is the 'controller' of your personal information. 'Controller' means that because of the relationship we have with you, we can decide how your information is used and for what purpose. Personal information means information about you or information that we can use to identify you.

For clarity, when we use 'we' 'us' and 'our' in this notice, we mean Handelsbanken Wealth and Asset Management Limited.

More information about Handelsbanken Wealth and Asset Management Limited can be viewed on our website at: wealthandasset.handelsbanken.co.uk

If you have any queries about this Privacy Notice or would like to exercise your data protection rights, you can contact our Data Protection Officer. They can be reached at Data Protection Officer, Handelsbanken Wealth and Asset Management Limited, 25 Basinghall Street, London, EC2V 5HA or by emailing: <a href="https://www.dpo@handelsbanken.co.uk">https://www.dpo@handelsbanken.co.uk</a>

We'll update this Privacy Notice from time to time. You'll find an up-to-date version at <a href="wealthandasset.handelsbanken.co.uk/corporate-responsibility/privacy-notice">wealthandasset.handelsbanken.co.uk/corporate-responsibility/privacy-notice</a>. We'll let you know in a timely manner if we make changes to the way we use your data.

#### Have you been introduced to us by a financial intermediary?

Our products and services can be introduced to you by our parent company Handelsbanken plc if you have a banking relationship with them. Our products and services may also be introduced by other financial intermediaries such as private financial advisers not affiliated with us or our parent company, or a lawyer or accountant. In this notice we'll refer to these collectively as professional intermediaries.

Where a financial intermediary processes your personal information on our behalf, this Privacy Notice will apply, and you should contact our Data Protection Officer to exercise your rights under data protection laws. When a financial intermediary processes your personal information as a data controller in its own right, where they can decide how to use your information, their privacy notice will apply, not ours. You'll be able to get a copy from them if you don't have one.

#### **Business information**

If you're a business customer, we collect and hold information about your business in relation to the product(s) and services we provide to you. Information provided to us about any individual associated with your business is considered personal information which we collect and use in accordance with this Privacy Notice and the Data Protection Legislation.

Information relating to your business, which isn't personal information, will also be collected and used by us as shown in this Privacy Notice. In particular, we'll hold your business information as confidential and will only share or disclose it to others as detailed in 'Who we share your personal information with' below. Business information will be kept secure using appropriate security measures and will be kept by us as detailed in 'How long we keep your personal information for' below. Data protection rights only apply to individuals and not to commercial entities.



## What kinds of personal information do we hold about you?

To fulfil our obligations to prospective and existing customers or a person who has a business or financial relationship with the customer, including but not limited to persons with power of attorney and family members, we handle different types of personal information about you and them.

We'll also process personal data of the employees of our suppliers and other parties that we have a business relationship with. The Data Protection Legislation requires us to explain to you what categories of personal information we process. This will depend on the products or services you or they apply for and get from us.

In Handelsbanken Wealth and Asset Management Limited, we organise your personal information into the following categories:

Categories of personal information	Description (examples)
Basic personal information	<ul> <li>Your title and full name</li> <li>Contact details, including: your home address, any other contact address, your address history, home and mobile telephone numbers, email address</li> <li>Your date of birth</li> <li>Your nationality, if this is necessary for us to comply with our legal and regulatory requirements</li> <li>Your Tax Identification Number e.g. UK National Insurance number</li> </ul>
Assessment and classification	<ul> <li>Basic personal information we collect to verify your identity and carry out fraud and anti-money laundering checks to verify that you (or your business, if applicable) meets     the conditions needed to open the account(s) and provide advice, and to help us assess financial crime risks</li> <li>Details of assessment carried out for legal and regulatory purposes such as an assessment of the suitability of advice given</li> <li>Details of your knowledge and experience of investments</li> <li>Records of any gifts and hospitality offered to Handelsbanken Wealth and Asset Management Limited staff</li> </ul>
Agreement	Your agreement and terms and conditions relating to the product(s) and service(s) you hold with us     Your signature
Communication	<ul> <li>A record of your communication with us, including the recording of telephone calls with us</li> <li>If you get in touch with us online, details such as your mobile phone location data, IP address and MAC address</li> </ul>
Financial transactions	<ul> <li>Bank account and sort code details</li> <li>Details of your income, savings, pensions, expenditure, assets and liabilities</li> <li>Transactions and payments relating to your account(s)</li> <li>Details of third parties we may be asked to make payment to</li> <li>Information about your tax position</li> </ul>
Special categories of personal data	<ul> <li>Personal information which we obtain from fraud prevention or similar agencies (see the section on fraud prevention agencies below)</li> <li>Your marital status, family, lifestyle or social circumstances if relevant to the product or service we are providing to you</li> <li>Information about your health or personal circumstances that is necessary for us to use to protect your economic wellbeing (which means your financial security), provide you with a product or service or in other circumstances where you need additional support or are at risk of harm</li> </ul>
Personal preferences	Any consents which you provide to us regarding how we use your data, for example your preferences to be contacted for marketing
Audit	Your computer's IP address when you access and use our website     Some of our premises may use CCTV cameras to protect you, others and the company from crime

### Providing us with information about other individuals

If you make a joint application with your spouse, partner or family member we'll also collect the personal information mentioned above about that person. You must show this Privacy Notice to the other applicant and ensure they give you authority to share their information with us for the purposes described in this Privacy Notice.

If you look now at the "How we use your personal information" section (below), you'll see reference to consent and a description of some limited scenarios showing what we do with personal information. If we ask you to get consent from the joint applicant (such as for marketing) we'll provide a method to record the consent.

If there's somebody who has power of attorney over your affairs, that person will see this Privacy Notice when we make contact with them directly.

If you provide us with information about other individuals (including, but not limited to beneficiaries, executors, employees, your business partners, directors, account signatories or authorised users) we rely on you to ensure you have their authority to process their information.

If you provide us with information about other individuals, you're confirming that you've told them that we may process and disclose their data in the same way that we can for you.

#### How we obtain your personal information

We'll generally collect your personal information from you directly. This will include from enquiry stage and during your ongoing relationship with us, for example through meetings, telephone conversations and other correspondence such as emails and letter.

If you're introduced to us by a Handelsbanken branch or other financial intermediary or are a person who has a business or financial relationship with the customer, we'll get some basic personal information about you from them when they introduce you to us and as necessary to provide the service.

Where relevant to the product or service you hold with us, or relationship you have with us, we may also get your personal information from other third parties you have authorised us to correspond with, or places such as:

- · fraud prevention agencies
- · Credit reference agencies
- HMRC
- · Department of Work and Pensions
- · Tracing services
- publicly available directories and information (e.g. telephone directory, social media, internet, news articles)
- publicly accessible sources (e.g. the electoral registers, also known as the electoral roll)
- · other organisations to assist in prevention and detection of crime; and
- · police and law enforcement agencies.

Some personal information may come from Handelsbanken plc and other members of our Group if you already have a product or service with them.

Some personal information from credit reference agencies will originally have come from publicly accessible sources, in particular, from:

- · court decisions
- · bankruptcy registers; and
- · the electoral register.

#### How we use your personal information (including when we share it with others)

We can only use your information if we have an appropriate reason and legal basis to do so. This section explains those reasons and the legal basis under data protection law. In some cases, more than one legal basis shown below may be relevant.

'Legitimate interests' means where we, under data protection law, have a genuine business reason to use your information. An example of this would be to improve the product or service you have with us. "Legitimate interests" does not mean we can use your information to unfairly affect you, your rights or freedoms.

How we use your information	Our legal basis	Our legitimate interests (where applicable)
To understand your financial position and requirements to assess what services we can provide you, whether you're a prospective or current customer	Our legitimate interests     To fulfil a contract with you	Being able to contact you  Maintaining and improving efficiency in the delivery of our products, services and obligations  Maintaining and improving the relevancy of our products and services
Administering and managing your account and services, updating your records, and tracing your whereabouts to contact you about your account	To fulfil a contract with you     Our legitimate interests	Being efficient about keeping up-to-date records Being able to contact you Maintaining and improving efficiency in the delivery of our products, services and obligations Complying with our regulatory requirements
All stages and activities relevant to managing your account. These include enquiry, application, administration and processing of your instructions	To fulfil a contract with you     Our legitimate interests	Maintaining and improving efficiency in the delivery of our products, services and obligations
Sharing your personal information with other product providers. For example, when you ask us to share information about your account with them	To fulfil a contract with you	
To test and improve the performance of our products, services and internal processes	Our legitimate interests	Maintaining and improving efficiency in the delivery of our products, services and obligations     Developing products and services
For management and audit of our business operations including accounting	Our legitimate interests	Being efficient about keeping up to date records Internal and external accounting Maintaining and improving efficiency in the delivery of our services and obligations Complying with our regulatory requirements
To monitor and analyse the conduct of your account and to keep customer records	Our legitimate interests     Our legal obligations	Being efficient about keeping up to date records  Maintaining and improving efficiency in the delivery of our products, services and obligations  Complying with our regulatory requirements
To meet our obligations, guidance and best practice under requirements of governmental and regulatory bodies such as HMRC, the Financial Conduct Authority, the Ombudsman, the Information Commissioner's Office, and under the Financial Services Compensation Scheme	Our legitimate interests	Complying with our regulatory requirements
To meet our good governance requirements and those of other members of our Group, such as internal reporting and compliance obligations or administration required for those processes	Our legitimate interests	<ul> <li>Being efficient at keeping up to date records</li> <li>Internal and external accounting</li> <li>Maintaining and improving efficiency in the delivery of our products, services and obligations</li> <li>Complying with our regulatory requirements</li> </ul>

To undertake analysis and develop statistics	Our legitimate interests	<ul> <li>Maintaining and improving efficiency in the delivery of our products, services and obligations</li> <li>Developing products and services and setting appropriate pricing</li> </ul>
For the management and assessment of financial crime risks and for compliance with all laws and regulations that apply to us and members of our Group, such as anti-money laundering, counter terrorism financing, financial sanctions, anti-fraud, anti-bribery and corruption, immigration and anti-terrorism laws	<ul> <li>Our legal obligations</li> <li>Our legitimate interests</li> <li>In the substantial public interest, in order to prevent or detect unlawful acts</li> </ul>	Complying with our regulatory requirements     Assess and manage financial crime risks in order to protect you, others and the company
For establishment, defence and enforcement of our legal rights or those of any other member of our Group	Our legal obligations	
To verify your identity and carry out checks to help us and others prevent and detect fraud and money laundering. As part of that customer due diligence process, we undertake such checks with credit reference agencies, fraud prevention agencies and similar organisations at pre-application, at the application stage, and periodically after that. Where you've been introduced to us by a financial intermediary, they may do these searches on our behalf	<ul> <li>Our legal obligations</li> <li>Our legitimate interests</li> <li>In the substantial public interest, in order to prevent or detect unlawful acts</li> </ul>	Complying with our regulatory requirements     Protecting you, others and the company from financial crime
For activities relating to the prevention, detection and investigation of crime	<ul> <li>Our legal obligations</li> <li>Our legitimate interests</li> <li>In the substantial public interest, in order to prevent or detect unlawful acts</li> <li>Making a disclosure in good faith under either of the Terrorism Act 2000 or the Proceeds of Crime Act 2002</li> </ul>	Protecting you, others and the company from crime
To deal with requests from you to exercise your rights under data protection laws	Our legal obligations	
To investigate and resolve complaints from you or raised through a third party such as a regulatory body or alternative dispute resolution scheme	<ul><li>Our legal obligation</li><li>Our legitimate interests</li></ul>	<ul> <li>Complying with our regulatory requirements</li> <li>To respond to your needs or complaints</li> <li>To prevent errors and enhance products and services.</li> </ul>
When you request that we share your personal information with someone else, such as to your accountants, lawyers or other professional advisers	Your consent	
In specific circumstances, we may need to process special categories of personal data; for example, your health or personal circumstances where we may need to take reasonable steps to protect and support you as a vulnerable customer; or to provide you with additional support	Our legitimate interests     In the substantial public interest where needed to protect your economic wellbeing or to protect you from harm	<ul> <li>To meet our regulatory obligations to protect vulnerable customers</li> <li>To ensure the wellbeing of our customers</li> </ul>

To provide you with recommendations, our	Your consent	
Protection team process special categories of personal data; for example, your health and medical conditions and personal circumstances, which will be used to calculate premiums for protection products supplied by our panel of provider(s)	Tour consent	
Where you're a customer to send you information about products and services which we believe you may be interested in; or where you're a customer of Handelsbanken plc to contact you about Handelsbanken Wealth and Asset Management Limited products and services	Your consent	
Where you're a prospective customer to contact you by post or phone to introduce ourselves or in response to a request from you for information about our services, which may also be by email	Our legitimate interest     Your consent	Being able to contact you     Business development
Where you're a customer (or former customer) to participate in a review of the products and / or services that we've provided to you, where your response helps us meet our regulatory requirements	Our legitimate interests	Complying with our regulatory requirements
To contact you in connection with products or services that you or your employer provide to the company	Our legitimate interests	Being able to contact you     Maintaining and improving efficiency in the delivery of our products, services and obligations
To contact you about products or services that we provide to you	<ul><li>To fulfil a contract with you</li><li>Our legitimate interests</li><li>Our legal obligations</li></ul>	<ul> <li>Being able to contact you about any changes to the products you hold with us</li> <li>To help you manage your account(s)</li> <li>To notify you of any important regulatory matters</li> </ul>

# How you can withdraw your consent

In most cases we don't rely on your consent to use your personal information, usually our legal basis for using it is to meet our legal obligations or to fulfil a contract with you. However, where we do rely on your consent and you've given us this (for example, if you opt-in to receive information about our products and services), you have the right to withdraw your consent at any time. You can do this by contacting us using the details on the front page.

Please be aware that withdrawing your consent might mean that we can't send you marketing communications, however there are some circumstances where we may still use your contact details to send you important information, such as to tell you about changes to our contact details, or to comply with our regulatory obligations (such as to provide you with proposed changes to your account terms of business).

If you were introduced to us through a financial intermediary, we'll tell them that you've withdrawn your consent, only if they're processing your personal information on our behalf or if we're required to do so. As they are a data controller in their own right, you need to contact them directly to withdraw your consent for what they do with your personal information.

# Who we share your personal information with

In relation to how we use your information as described above, we may (where necessary, applicable and relevant) share your personal information with:

Person/organisation	Our legal basis	Our legitimate interests (where applicable)
Other individuals involved in your agreement with us, for example:	To fulfil a contract with you	
Where you have instructed us to provide information to another individual or signatory of the agreement or 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.		
Other providers or third parties you may ask us to provide information to or request information from.	To fulfil a contract with you	
Handelsbanken plc for the purpose of making business referrals	Your consent	
Handelsbanken plc and members of our Group for the purpose of sharing client (customer) data to enable the legal and regulatory obligations in relation to:  • Anti-money laundering  • Counter terrorist financing  • Financial sanctions  • Anti-fraud  • Anti-bribery and corruption	Our legal obligations     Our legitimate interests	<ul> <li>Being efficient at keeping up to date records</li> <li>Maintaining and improving efficiency in the delivery of our products, services and obligations</li> <li>Assess and manage financial crime risks in order to protect you, others and the company</li> </ul>
Members of our Group	Our legitimate interests	Being efficient at keeping up to date records Maintaining and improving efficiency in the delivery of our products, services and obligations Internal and external accounting
The financial intermediary who introduced you to us	Our legitimate interests	<ul> <li>Being efficient at keeping up to date records</li> <li>Maintaining and improving efficiency in the delivery of our products, services and obligations</li> <li>Internal and external accounting</li> </ul>
Our legal and other professional advisers, auditors and actuaries	Our legitimate interests	<ul> <li>Being efficient at keeping up to date records</li> <li>Maintaining and improving efficiency in the delivery of our products, services and obligations</li> <li>Complying with our regulatory requirements</li> <li>Internal and external accounting</li> </ul>
Financial institutions and trade associations, where necessary to comply with applicable laws and regulations (such as immigration, anti-money laundering and anti-terrorism), and where we consider it reasonably necessary to assist us or other organisations to fight crime and terrorism	Our legitimate interests	Complying with our regulatory requirements     To protect you, others and the company from financial crime

Our approved and contracted professional service providers who provide services to us and to you, such as: those who provide additional services to you under your agreement, our payment processing service providers, our secure confidential waste destruction and document storage providers, and our IT software and maintenance providers.  There may be occasions where our payment	Our legitimate interests	<ul> <li>Being efficient at keeping up to date records</li> <li>Maintaining and improving efficiency in the delivery of our products, services and obligations</li> <li>Complying with our regulatory requirements</li> </ul>
processing service providers will be a separate data controller under the Data Protection Legislation because they (or any member of their group), will need to process your information relating to payments. They will need to do this to:		
<ul> <li>i) comply with applicable laws, regulations and their own compliance obligations which may include: voluntary codes, court orders, agreements or treaties that are applicable to the provider (or a member of their group), international and industry guidance and the provider's internal policies or procedures;</li> <li>ii) detect, prevent and investigate financial crime;</li> <li>iii) enforce or defend their rights (or those of a member of their group), and</li> </ul>		
iv) manage their operational requirements.  The payment processing service provider will only process your information for any one or more of the above purposes where this is strictly necessary.		
Buyers and their professional representatives as part of any restructuring or sale of our business or assets	Our legitimate interests	<ul> <li>Being efficient at keeping up to date records</li> <li>Complying with our legal and regulatory requirements</li> <li>Internal and external accounting</li> </ul>
Licensed credit reference agencies (see below where we explain more)	Our legitimate interests	<ul> <li>To assess credit worthiness</li> <li>To protect you, others and the bank from financial crime</li> <li>Complying with our regulatory requirements</li> </ul>
Approved and contractually appointed marketing, insights and survey organisations who help us to develop and improve our products and services	Our legitimate interests	<ul> <li>Maintaining and improving efficiency in the delivery of our products, services and obligations</li> <li>Maintaining and improving the relevancy of our products and services</li> <li>To help us understand how we can improve our products and services</li> </ul>
Licensed fraud prevention agencies (see below where we explain more)	Our legal obligations     Our legitimate interests	<ul> <li>To protect you, others and the company from financial crime</li> <li>To meet our regulatory obligations</li> </ul>
Law enforcement agencies and governmental and regulatory bodies such as HMRC, Department of Work and Pensions, the Financial Conduct Authority, the Ombudsman, the Information Commissioner's Office, and under the Financial Services Compensation Scheme	<ul> <li>Our legal obligations</li> <li>Our legitimate interests</li> <li>Making a disclosure in good faith under either of the Terrorism Act 2000 or the Proceeds of Crime Act 2002.</li> </ul>	<ul> <li>To protect you, others and the company from crime</li> <li>To meet our regulatory obligations</li> </ul>
Courts and other organisations where it's necessary for the administration of justice, to protect vital interests and to protect the security or integrity of our business operations	Our legal obligations     Our legitimate interests	To protect you, others and the company from crime

#### Transfers of your personal information outside of the UK

We're based in the UK, but sometimes we may need to transfer your personal information outside the UK.

If it's processed within the European Economic Area (EEA) then it's protected by data protection standards similar to those in the UK. Some countries outside the EEA also have adequate protection for personal information under laws that apply to us.

We'll make sure that suitable safeguards are in place before we transfer your personal information to countries outside the EEA. Safeguards include:

- contractual obligations imposed on the recipients of your personal information which require them to protect your personal information to the standard required in the UK; and
- requiring the recipient to subscribe to 'international frameworks' intended to enable secure data sharing to protect personal information.

#### How do we share your information with credit reference agencies (CRAs)?

We'll use your personal information to carry out customer due diligence. This includes fraud prevention and money laundering checks, verification of your identity, sanctions checks and adverse media checks. If you are a prospective supplier, we are in the process of engaging with, we'll also conduct financial health checks on your business.

To do this, we'll supply your personal information to our approved anti-money laundering and know your customer (KYC) solution provider who may use CRAs or fraud prevention agencies to conduct a number of their checks. CRAs will provide both public (including the electoral register) and shared credit, financial situation and financial history information and fraud prevention information.

We'll use this information to:

- assess your creditworthiness as a supplier of a service to us;
- · verify the accuracy of the data you have provided to us; and
- · prevent criminal activity, fraud and money laundering.

Where we carry out a customer enquiry search (for example to verify your identity) this will leave a soft footprint on your credit file which will be viewable to you but not to others.

#### Preventing financial crime and how we share your information with fraud prevention agencies

We'll use your personal information to carry out customer due diligence. This includes fraud prevention and money laundering checks, verification of your identity, sanctions checks and adverse media checks.

To do this we'll share your personal information with fraud prevention agencies such as Cifas, and other similar organisations. We will also search publicly available directories and information (e.g. telephone directory, social media, internet, news articles) registers including HMRC and other public registers held by organisations such as the Financial Conduct Authority.

We, and fraud prevention agencies, may also enable law enforcement agencies to access and use your personal information to detect, investigate and prevent crime. If we, or a fraud prevention agency, determine that you pose a fraud or money laundering risk, we may refuse to provide the services you've requested, do business with you or we may stop providing existing services to you.

A record of any fraud or money laundering risk will be kept by the fraud prevention agencies, and may result in others refusing to provide services, financing or employment to you. If you have any questions about this, please contact us on the details above.

If there are other individuals connected to your account, such as joint account holders or signatories, their information may be used to carry out checks in the same way.

Fraud prevention agencies can keep personal information for different lengths of time. They can keep your data for up to six years if they find a risk of fraud or money laundering.

Some fraud prevention agencies, and similar organisations, may transfer your personal information outside of the UK and EEA. Where they do, there will be a contract in place to make sure that the recipients of that data protect it to the standard required in the UK and EEA. They may also require the recipient to subscribe to 'international frameworks' intended to make data sharing secure.

#### Do we do any monitoring involving processing of your personal information?

We may conduct short term, carefully controlled monitoring of the activities on your account. This may be necessary for our legitimate interests or to meet our legal obligations, for instance, where we suspect fraud, money laundering or other crimes.

We monitor and record telephone calls and email communications in order to comply with regulatory rules and our own policies and procedures. This is for the purposes of staff training, resolving queries or issues, preventing or detecting fraud or other criminal activity, and to allow us to review and improve the quality of our services.

A written record may be kept of in-person meetings that you may have with our staff members, to make sure that we have a record of what has been discussed and any instructions that you may give.

We may also get some personal information about you when we use CCTV on our premises. We use CCTV on our premises to ensure the safety and security of our staff and customers.

#### Profiling and other automated decision making

We may use your information to prepare statistical, market analysis and product analysis to be shared internally. When carrying out analysis, we may combine the information we have with information we receive from external organisations. The information we produce, and share, is never attributed to you, and you will not be able to be identified from it.

Additionally, we may use your personal information in processes and profiling activity to carry out fraud and anti-money laundering checks, to verify that you (or your business, if applicable) meet the conditions needed to open the account(s), and to help us assess financial crime risks. If you're a business customer, we may use the personal information of related individuals (such as directors, shareholders and authorised signatories) in processes and profiling activity to carry out fraud and anti-money laundering checks, to verify that the business meets the conditions needed to open the account(s), and to help us assess financial crime risks.

We do this to meet our legal and regulatory obligations and to protect you, us and others from financial crime.

If you've given your consent for us to identify and send you information about products and services, we may use profiling activity to decide what type of marketing communications to send you. Our profiling activity may include analysis of information you give to us and details about how you use the products and services you have with us. We do this to ensure you receive the most relevant information about products and services at the right time.

# How we process your information to provide additional support

We have a responsibility to treat our customers fairly and to protect your economic wellbeing where life events or your health mean that you need additional support. In such cases we may process your personal data, including special category data, if necessary, as it is in the substantial public interest to either protect your economic wellbeing or prevent you from harm. If we collect and process your special category data, we'll carefully explain how and why we are doing that in the particular case and discuss with you to understand what support you may require. The information we collect is held securely with access limited to those who need it to be able to support you.

#### How long we keep your personal information for

How long we keep your personal information depends on the products and services you hold with us or services you provide to us.

We'll 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 depending on the product, service or legal requirements. We keep your information in order to:

- · comply with our legal and regulatory requirements;
- · demonstrate we treated you fairly;
- · respond to your needs, queries or complaints;
- · respond to potential legal claims.

In cases where you're a prospective customer discussing products or services and you do not proceed with our recommendations, we'll normally only keep your data for two years from the last point of contact, but this may be longer as required by law.

If you'd 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?

Here is a list of the rights that all individuals have under data protection laws. They don't apply in all circumstances, if you wish to exercise any of them, we'll explain at that time if they are applicable.

Your data protection rights	Description
The right to be informed	We have to be transparent with you about the processing that we do with your personal information. This is why we have a Privacy Notice. The information that you supply is determined by whether or not we collected your personal information directly from you or indirectly via someone else (such as a broker or other intermediary).
The right to have your personal information corrected	If you believe any of your information is incorrect, wrong or incomplete we'll take steps to check it and correct it. If we've disclosed the personal information in question to other organisations, we must inform them of the rectification where possible.
The right to object to processing of your personal information	You can object to our use of your personal information where: we rely on legitimate interests (as described above), where it's processed for direct marketing (including profiling relevant to direct marketing) or it's processed for the purposes of statistics.
The right to restrict processing of your personal information	If you believe that your personal information is incorrect or you believe that the way that we're using it is unlawful, you can ask us to stop using it. We will not actively use the data whilst we investigate and validate its accuracy and our lawful use. If we have no reason to keep your information, you can ask us to continue to hold it (but not use it) to exercise your legal claims.
The right to have your personal information deleted (also known as the "right to be forgotten")	You can request the deletion of the personal information that we hold about you. We'll do so if we have no legal, regulatory or compelling business reason to keep it.
The right to request access to your personal information	You can ask us to provide you with a copy of the personal information that we hold about you. This may help you to determine if you can exercise other rights (those mentioned above and below).
The right to port your personal information to another firm	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 (such as a spreadsheet).
Rights relating to automated decision making	If we make an automated (computerised) decision which has a significant impact on you, you can request that a human review the decision.

You can contact our Data Protection Officer for more details on all the above. You also have the right to complain to the Information Commissioner's Office which enforces data protection laws: <u>ico.org.uk</u>.

#### Your marketing preferences and what this means

Where we have consent, we may contact our customers by post, phone, email and other electronic means about products and services which we believe you may be interested in. We won't do this if you haven't given us your consent and you can withdraw your consent at any time by contacting us or your local Handelsbanken branch.

#### 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.



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Handelsbanken Wealth & Asset Management Limited is authorised and regulated by the Financial Conduct Authority (FCA) in the conduct of investment and protection business, and is a wholly owned subsidiary of Handelsbanken plc. Tax advice which does not contain any investment element is not regulated by the FCA.