

River and Mercantile Group

Privacy Notice

We ask that you read this privacy notice carefully as it contains important information on who we are, how and why we collect, store, use and share personal information, your rights in relation to your personal information and on how to contact supervisory authorities and us in the event you have a complaint.

Please refer to our [Cookie Policy](#) which explains the use of cookies and other web tracking devices employed via our website.

Who we are

River and Mercantile collects, uses and is responsible for certain personal information about you. For the purposes of this notice, River and Mercantile comprises of River and Mercantile Group PLC, River and Mercantile Asset Management LLP, and P-Solve Investments Limited, including River and Mercantile Derivatives. When collecting and using your personal data, we are regulated under the [General Data Protection Regulation](#) which applies across the European Union (including in the United Kingdom) and we are responsible as 'controller' of that personal information for the purposes of those laws.

The personal information we collect and use

Information collected by us

In the course of you or your organisation:

- interacting with our website;
- offering to provide or providing services to us;
- working towards or agreeing to receive (and actually receiving) services from us;
- attending a River and Mercantile event; or visiting a River and Mercantile stand at an independent industry event;
- choosing to sign up to receive our newsletters and/or blogs.

we may collect personal data about you, including:

- contact information, such as first name and last name, company name, job title, business address, business telephone number and business email address;
- where requested for "know your customer" purposes, personal identification documentation and related information including date of birth, place of birth, personal identification numbers, nationality, residential address, employment history, address history and proof of address;
- information necessarily processed in a project or contractual relationship with River and Mercantile or voluntarily provided by you;
- details of your visits to our premises.

Information collected from other sources

We may obtain personal information from other sources including from your organisation, other organisations with whom you have dealings, an information or service provider or from privately available records, including Pension Funds Online.

We may also obtain personal information from private and/or public compliance databases. The information obtained in connection with customer due diligence for compliance purposes will likely detail whether you may be a "politically exposed person" or whether you have committed particular crimes, relevant to your participation in financial services.

How we use your personal information

We may use your personal information for the following purposes (the "Purposes"), namely to:

- manage and administer your or your organisation's business relationship with River and Mercantile;

- provide services as contracted by you or your organisation;
- comply with our legal and regulatory obligations and requests anywhere in the world, including reporting to and/or being audited by national and international regulatory bodies;
- analyse and improve our services and communications to you;
- manage access and protect security to our premises, IT and communication systems, online platforms, websites and other systems, preventing and detecting security threats, fraud or other criminal or malicious activities;
- identify persons authorised to instruct on behalf of our customers, suppliers and/or service providers;
- carry out “know your customer” and anti-money laundering checks, including checking such personal information against databases of individuals who are subject to sanctions, classified as “politically exposed persons” or have committed crimes as referenced above;
- enter into and contact you with respect to investment advisory and/or investment management agreements;
- for any purpose related and/or ancillary to any of the above or any other purpose for which your personal data was provided to us.

We may also process your personal data for the following purposes:

- communicating with you to keep you up to date on our services and other information we think may be relevant to you (including but not limited to free investment conferences, training and educational briefings, newsletters and other information);
- seeking participation in customer surveys, marketing campaigns, market analysis or other promotional activities or events; or
- collecting information about your preferences to create a user profile to personalise and foster the quality of our communication and interaction with you (for example, by way of newsletter tracking or website analytics).

If you do not wish to receive marketing-related communications from us about our products and services, then you can choose to unsubscribe at any time by clicking the unsubscribe link included on every relevant communication. You can also change your marketing preferences at any time by contacting us by email: marketing@riverandmercantile.com.

Reasons we can collect and use your personal information

The lawful basis on which we collect and use your personal information for the Purposes includes:

- processing which is necessary for performance of a contract with you or your organisation;
- processing which is necessary for compliance with our legal obligations; or
- processing for purposes of our legitimate interest, provided that such interests are not overridden by your interests or fundamental rights and freedoms.

In addition, processing may be based on consent where you have expressly given that to us.

Who we share your personal information with

We will not share or disclose your personal information except to the extent required by applicable law or regulation, or to such parties and for such purposes as identified below:

- third party suppliers, including contact relationship management systems providers to help us improve and promote our services. Such suppliers will be contractually restricted from using any personal data for purposes other than providing services to us or on our behalf. We may also share your personal information with anti-money laundering compliance companies, counterparty banks and client custodians if required for the provision to you of any services to which you subscribe;

- within River and Mercantile, on a confidential basis where required for the purpose of providing services or administrative and other business purposes;
- to any party to whom we assign or novate any of our rights or obligations;
- to regulators, courts, law enforcement authorities or other parties for the purposes of compliance with applicable law, regulation, legal process or governmental requests or the establishment, exercise and/or defence of a claim.

Some of those above mentioned parties may be based outside the European Economic Area — for further information including on how we safeguard your personal data when this occurs, see 'Transfer of your information out of the EEA'.

We will not share your personal information with any other third party without your consent.

How long your personal information will be kept

We may continue to hold, use and share your information as described in this Privacy Notice after our business relationship has ended. We will only hold your personal information for as long as is necessary for the Purposes or until we are not otherwise legally required or permitted to continue storing such data.

Transfer of your information out of the EEA

We may transfer your personal information between River and Mercantile entities and third party suppliers inside and outside the European Economic Area (EEA) for purposes of support and data storage back-up. Any such transfer of your personal information will be subject to appropriate safeguards to protect your personal information, including appropriate contractual protections. In addition, we may disclose your personal information to anti-fraud organisations and law enforcement or regulatory agencies anywhere in the world.

We will not otherwise transfer your personal data outside of the EEA. If you would like further information please contact us (see 'How to contact us' below).

Your rights

Under the [General Data Protection Regulation](#) you have a number of important rights free of charge. In summary, those include rights to:

- fair processing of information and transparency over how we use your use personal information;
- access to your personal information and to certain other supplementary information that this Privacy Notice is already designed to address;
- require us to correct any mistakes in your information which we hold;
- require the erasure of personal information concerning you in certain situations;
- receive the personal information concerning you which you have provided to us, in a structured, commonly used and machine-readable format and have the right to transmit those data to a third party in certain situations;
- object at any time to processing of personal information concerning you for direct marketing (save that we will retain a single set of basic personal information to ensure such communications are no longer sent to you);
- object to decisions being taken by automated means which produce legal effects concerning you or similarly significantly affect you;
- object in certain other situations to our continued processing of your personal information; and
- otherwise restrict our processing of your personal information in certain circumstances.

For further information on each of those rights, including the circumstances in which they apply, see the [Guidance from the UK Information Commissioner's Office \(ICO\) on individuals' rights under the General Data Protection Regulation](#).

If you would like to exercise any of those rights, please:

- email, call or write to us;
- let us have enough information to identify you (we may ask for proof of your identity and address); and
- let us know the information to which your request relates.

Keeping your personal information secure and up-to-date

We have appropriate security measures in place to prevent personal information from being accidentally lost, or used or accessed in an unauthorised way. We limit access to your personal information to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

If any of the personal data you have provided to us changes or you become aware we have inaccurate personal information about you, please let us know by sending an email to marketing@riverandmercantile.com. We will not be responsible for any losses arising from any inaccurate, inauthentic, deficient or incomplete personal information that you provide us.

How to complain

We hope that we can resolve any query or concern you raise about our use of your information.

The [General Data Protection Regulation](#) also gives you a right to lodge a complaint with a supervisory authority, in particular in the European Union (or European Economic Area) state where you work, normally live or where any alleged infringement of data protection laws occurred. The supervisory authority in the UK is the Information Commissioner who may be contacted at <https://ico.org.uk/concerns/> or telephone: 0303 123 1113.

Changes to this privacy notice

This privacy notice was published in May 2018 and last updated on 26 July 2018.

We may change this privacy notice from time to time in order to reflect any changes to the way in which we process your personal data or changing legal requirements. We will publish the changed privacy notice on our website and any changes will take effect as soon as such notice is posted.

How to contact us

Please contact us or our Privacy Officer, Penny Steiner (penny.steiner@riverandmercantile.com) if you have any questions about this privacy notice or the information we hold about you.

If you wish to contact us more generally, please send an email to marketing@riverandmercantile.com, or call 0203 327 5100.