

1. Introduction

- 1.1. Sarasin & Partners LLP (“we”, “us”, “our” or “ourselves”) are committed to protecting and respecting your privacy.
- 1.2. This policy (together with our website [Terms of Use](#) and any other documents referred to on the website) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our practices regarding your personal data and how we will treat it. By visiting www.sarasinandpartners.com (“our site”) you are acknowledging that you have been made aware of the practices described in this policy.
- 1.3. For the purpose of the Data Protection Act 1998 (the “Data Protection Act”) and the General Data Protection Regulation (Regulation (EU) 2016/679) which is due to come into force on 25th May 2018 (“GDPR”), the Data Controller is Sarasin & Partners LLP whose registered address is at Juxon House, 100 St. Paul’s Churchyard, London EC4M 8BU. Our Data Protection Officer can be contacted at dataprotection@sarasin.co.uk.
- 1.4. www.sarasinandpartners.com is a site operated by Sarasin & Partners LLP. We are registered in England and Wales with registration number OC329859 and we have our registered office at Juxon House, 100 St. Paul’s Churchyard, London EC4M 8BU.
- 1.5. We are regulated by the Financial Conduct Authority.

2. Information we may collect from you

- 2.1. We may collect and process the following data about you:
 - (a) information you give us: you may give us information about you by filling in forms on our site www.sarasinandpartners.com and other Sarasin & Partners LLP webpages or by corresponding with us by phone, e-mail or otherwise. The information you give us may include your name, job title, company name, address, e-mail address and phone number.
 - (b) information we collect about you: with regard to each of your visits to our site we may automatically collect the following information:
 - (i) technical information, including the internet protocol (“IP”) address used to connect your computer to the internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform; and
 - (ii) information about your visit, including the full uniform resource locators (“URL”) clickstream to, through and from our site (including date and time); information you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page.
 - (c) information we receive from other sources: we may receive information about you if you use any of the other websites we operate or the other services we provide. In this case we will have informed you when we collected that data that it may be shared internally and combined with data collected on this site.

3. Use of Cookies

- 3.1. Our site uses cookies. For detailed information on the cookies we use and the purposes for which we use them see our [Cookie Policy](#).

4. Fair Processing

- 4.1. We use selected third parties to collect and provide information about visitors to our website (to learn more about the third parties we use please see section 6, Disclosure of your Information below). When you visit our website we will record your IP address, as well as look up and link tracking information. Your IP address will be matched against public and proprietary IP address databases to provide us with information about your visit. This information may identify the organisation to whom the

IP address is registered but not individuals. However, in some cases it may be possible to identify your personal data from such publicly available data.

- 4.2. Cookies allow us to provide important site functionality so that you do not have to re-enter various information and to improve your web-user experience. They also allow us to remember what links and pages you have clicked or viewed during a session in order to improve the relevance of the marketing information you may choose to receive, such as event invitations, and relevant investment updates and/or product development updates. If you have provided us with personal data (completing one of our contact forms, for example) we may associate this personal data with other information. This will allow us to identify and record what is most relevant to you.

By using your browser controls, you are always in control of the cookies we store and access on your computer. More information, see our [Cookie Policy](#). For more information on how to control cookies and limit personal data processing please visit <http://www.youronlinechoices.com/uk/five-top-tips>. However, please note that if you disable cookies on our site then your browsing experience may be adversely affected.

5. Uses made of the information

- 5.1. We use information held about you in the following ways:

(a) information you give to us. We will use this information:

- (i) to carry out our obligations arising from any contracts entered into between you and us and to provide you with the information, products and services that you request from us;
- (ii) to provide you with information about other products and services we offer that are similar to those that you have already purchased or enquired about;
- (iii) to provide you, or permit selected third parties to provide you, with information about products or services we feel may interest you. If you are an existing client, we will only contact you by electronic means (e-mail) with information about products and services similar to those for which you are currently a client or which you may have previously shown an interest in. If you are a new user, and where we permit selected third parties to use your data, we (or they) will contact you by electronic means only if you have actively consented to this by ticking the box saying that you are willing for third parties to receive your information;
- (iv) to notify you about changes to our service;
- (v) to ensure that content from our site is presented in the most effective manner for you and for your computer.

(b) information we collect about you. We will use this information:

- (i) to administer our site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- (ii) to improve our site to ensure that content is presented in the most effective manner for you and for your computer;
- (iii) to allow you to participate in interactive features of our service, when you choose to do so;
- (iv) as part of our efforts to keep our site safe and secure;
- (v) to measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you; and
- (vi) to make suggestions and recommendations to you and other users of our site that may interest you or them.

(c) information we receive from other sources. We may combine this information with information you give to us and information we collect about you. We may use this information and the combined information for the purposes set out above (depending on the types of information we receive).

6. Disclosure of your information

- 6.1. We may share your personal information with any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries.

- 6.2. We may share your information with selected third parties including:

- (a) business partners, suppliers and sub-contractors for the performance of any contract we enter into with them or you;
- (b) marketing service providers and printers in providing you with the targeted marketing materials you consent to receiving; and
- (c) analytics and search engine providers that assist us in the improvement and optimisation of our site.

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- 6.3. We may also share your personal information with other third parties, for example in the context of the possible sale or restructuring of the business. We may also need to share your personal information with a regulator or to otherwise comply with the law.
 - 6.4. The third parties we may work with are subject to change from time to time. A full and current list of the third parties we share your information with is available upon request at dataprotection@sarasin.co.uk.
 - 6.5. We may disclose your personal information to third parties if we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our [Terms of Use](#) and other agreements.

7. Your rights

- 7.1. Some of our selected third parties are located outside of the European Economic Area (the “EEA”). We are satisfied that no data that we collect from you is currently being transferred to, processed and stored outside the EEA in order to perform our contract with you. Should this change, we shall endeavour to put in place appropriate transfer agreements and protective measures and take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy and the GDPR as and when it comes into force.
- 7.2. All information you provide to us is stored on our secure servers or those of our selected third parties. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.
- 7.3. Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site. Any transmission is at your own risk.
- 7.4. Once we have received your information, we will use strict procedures and security features designed to prevent unauthorised access. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality. We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

8. Your rights

- 8.1. In readiness for GDPR, we have already started to actively seek your express consent as to whether we can process your personal data for marketing purposes. We will inform you (before collecting your data) if we wish to use your data for such purposes or to disclose your information to any third party for such purposes. Under GDPR, you must consent to such processing by checking certain boxes on the forms we use to collect your data before we can share this data with anyone. You can also contact us to change your preferences or unsubscribe at any time at dataprotection@sarasin.co.uk or clicking on the “unsubscribe” feature within our marketing emails.
- 8.2. Our site may, from time to time, contain links to and from other websites. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

9. Data retention

- 9.1. Your personal data will be retained for as long as necessary to fulfill the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. The retention of your personal data will be subject to periodic review. We may keep an anonymised form of your personal data, which will no longer refer to you, for statistical purposes without time limits, to the extent that we have a legitimate and lawful interest in doing so. To find out more about our data retention policy please contact dataprotection@sarasin.co.uk.

10. Access to information

- 10.1. You have the right to access the information we hold about you. At present, and in accordance with the current Data Protection Act, any access request may be subject to a fee of £10 to meet our costs in providing you with details of the information we hold about you. As and when the GDPR comes into force (due, 25th May 2018), you shall have the right to access the information we hold about you for free. To find out more or request access to this information please contact dataprotection@sarasin.co.uk.

11. Changes to our privacy policy

11.1. Any changes we may make to our privacy policy in the future will be posted on this page. Please check back frequently to see any updates or changes to our privacy policy.

12. Contact

12.1. Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to dataprotection@sarasin.co.uk