

Fundment is committed to protecting and respecting your privacy. This policy (together with any other documents referred to on it) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us.

We will collect, store and use Personal Data in accordance with all applicable laws relating to the protection of Personal Data, including the EU Data Protection Directive 95/46/EC, the EU General Data Protection Regulation 2016/679, the EU ePrivacy Directive 2002/58/EC as amended by Directive 2009/136/EC, as amended or superseded from time to time, and any national implementing legislation (“Data Protection Laws”).

The data controllers will be Fundment Limited, trading as Fundment (“Fundment”) (incorporated and registered under company registration number 08884918, the registered office of which is at Mappin House, 4 Winsley Street, London, W1W 8HF).

Data protection law requires us to only collect personal information only where we have a legitimate reason to do so. We can only collect personal information for one or more of the reasons below:

- a. To fulfil our contractual obligations to you
- b. To satisfy our legal duty
- c. When we have received your consent

## **Information we may collect from you**

We may collect and process the following data about you:

### **Information you give us**

You may give us information about you by filling in forms on our site or by corresponding with us by phone, e-mail or otherwise. This includes but is not limited to information you provide when you register to use our site, open an account, post material on our site, carry out transactions or make payments through our site, sign-up for newsletters or enter a promotion.

### **Information we collect about you**

With regard to each of your visits to our site we may automatically collect the following information:

- 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

- information about your visit, including source of your visit, the full Uniform Resource Locators (URL) clickstream to, through and from our site (including date and time); products 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 and any phone number used to call our customer service number

- **Information we receive from other sources**

We may receive information about you if you use any other websites we operate or other services we provide. We may also receive information about you through third service providers (including, for example, business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers, credit reference agencies).

We may combine this information with any information you give to us and information we collect about you.

## Cookies

- Our website uses cookies for security and to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site.
- By continuing to browse the site, you are agreeing to our use of cookies A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer if you agree. Cookies contain information that is transferred to your computer's hard drive.
- When we send you an email, we may track whether you have opened that email and whether you have clicked any links it may contain. This helps us measure the performance of our campaigns. We do this by including single pixel gifs, also called web beacons, in emails we send. Web beacons allow us to collect information about when you open the email, your IP address, your browser or email client type and other similar details.

### How we classify the cookies we use:

We use a system of classification developed by the International Chamber of Commerce. This allows us to classify the different types of cookies which we use on our websites and provide you with more information about why we use them.

- Strictly necessary cookies. These are cookies that are required for the operation of our website. They include, for example, cookies that enable you to log into secure areas of our website.
- Analytical/performance cookies. They allow us to recognise and count the number of visitors and to see how visitors move around our website when

they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily.

- **Functionality cookies.** These are used to recognise you when you return to our website. This enables us to personalise our content for you, greet you by name and remember your preferences (for example, your choice of language or region).
- **Targeting cookies.** These cookies record your visit to our website, the pages you have visited and the links you have followed. We will use this information to make our website and the advertising displayed on it more relevant to your interests. We may also share this information with third parties for this purpose.
- **Social Sharing Cookies:** These provide you with additional functionality to share content from our web pages to social media websites and email using the social media widgets or buttons found on our websites. Use of these widgets or buttons may place a cookie on your device to make their service easier to use and to ensure your interaction is displayed on webpages (e.g. the social share count cache is updated). We encourage you to review each provider's privacy information before using any such service.

By using our websites, you are agreeing to the placement of cookies on your computer.

You block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our site.

## **Uses made of the information**

We use information held about you in the following ways:

- to provide you with any services and/or information you request from us which includes carrying out any obligations arising from any contracts entered into between you and us;
- to determine which investment portfolios are suitable for you, as well as carrying out fraud and money laundering checks
- to provide you with information about opportunities or services we offer that are similar to those that you have already purchased or enquired about, where you have provided us with consent
- to notify you about changes to our service; and
- to ensure that content from our site is presented in the most effective manner for you and for your computer.
- to perform any legal obligations required of us such as verifying your identity when you open an account.

## **Information we collect about you. We will use this information:**

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

## **Disclosure of your information**

We may share your personal information with any member of our group, which enable us to better understand your needs and manage your accounts in an efficient way.

### **We may share your information with selected third parties including:**

- Independent Financial Advisers who help you to run your accounts
- HM Revenue and Customs and other regulatory agencies
- Credit reference and fraud prevention agencies for the purpose of establishing your identity which is a condition of us entering into a contract with you.
- Companies that introduce you to us
- Companies that we may use to provide our service to you, such as custodians, brokers or pension providers
- Analytics and search engine providers that assist us in the improvement and optimisation of our site

### **We may disclose your personal information to third parties:**

- If we or substantially all of our assets are acquired by a third party, the personal data held by us about you, our contractual obligations to you and any consent you have given us to process your data will be shared with the acquiring party; and
- 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 any agreements between you; or to protect the rights, property, or safety of us, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

## **Where we store your personal data**

We store your data on our secure servers in the United Kingdom and retain it for a reasonable period or as long as the law requires. We will take all steps reasonably

necessary to ensure that your data is treated securely and in accordance with this privacy policy.

We ask you not to share a password with anyone. 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. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

## **Email**

If you no longer wish to receive our marketing emails, there is an unsubscribe link located in the footer of all such emails that we send.

## **Retention of personal information**

We will retain your personal information as long as you remain a customer of Fundment. When you cease being a customer, we may keep your personal information for up to five years in line with our regulatory obligations.

## **Your rights**

Individuals have a number of rights with regards to their data, as listed here: <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

This includes the need for you to provide your consent before we may process your personal data for marketing purposes. We will inform you (before collecting your data) if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes.

You can contact us about your rights at any time at [support@fundment.com](mailto:support@fundment.com).

## **Access to information**

The Act gives you the right to access information held about you. Your right of access can be exercised in accordance with the Act by emailing us at [support@fundment.com](mailto:support@fundment.com). Further access requests for the same information may be subject to a fee of £10 to cover our costs in providing you with these details.

## **Optional Personal Information**



By law, we require certain personal information in order to perform our services and run your portfolios. If you choose not to provide this personal information, we may have to cancel any service you have with us.

Where we collect any personal information that is optional, this will be stated on collection.

## **Changes to our privacy policy**

Any changes we may make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy policy.