

PRIVACY POLICY – MARCH 2020

Malloch Melville Investment Managers & Stockbrokers (“Malloch Melville”) and its appointees and employees take the protection of your personal information and your privacy very seriously and are committed to treating your data in compliance with the applicable laws and regulations. This policy underpins our approach to respecting your privacy and details the types of personal information we collect, the basis on which we do so, how we process, disclose and protect your personal data.

For the purposes of the Data Protection Act 2018 and the EU General Data Protection Regulation, Malloch Melville Investment Managers & Stockbrokers (a trading name of Malloch Melville Ltd, a company registered in England and Wales, registration number 09588651 with registered office at Queensgate House, 23 North Park Road, Harrogate, North Yorkshire, HG1 5PD is the data controller in respect of the Malloch Melville website (www.mallochmelville.co.uk).

By using the Malloch Melville website, you are consenting to Malloch Melville collecting, using and disclosing your personal information in accordance with this privacy policy.

If you do not agree to the collection, use and disclosure of your personal information in this way, please do not use the Malloch Melville website or provide us with your personal information. Malloch Melville is an investment advisory company and the contents of its website are designed and intended for use by adults. If we discover that we have collected information from a child without consent from a parent or a guardian where such consent should have been obtained, we delete that information as soon as possible.

This privacy policy is hereby incorporated into and forms part of the terms and conditions of use of Malloch Melville’s website and details the following:

1. What information do we collect?

In this policy, your “personal information” means information or pieces of information that could lead to your identification. We also use Google analytics to get limited details of your visit to the website including but not limited to, traffic data and location data. We do not use any cookies other than Google analytics and do not store the details of your IP address. If you contact us we will keep a record of that correspondence.

2. How do we use your personal information?

Where you have consented to receiving Malloch Melville news, information and updates, we may use the data that we have collected, or otherwise where we have the right to do so, we may use your information to let you know about our products and services that might be of interest to you and to inform you of any changes or developments as well as sending out investment related newsletters and reports. We will only ever do so using emails unless you specifically request us to contact you by any other means including telephone, post etc. Should you no longer wish that we continue using your data in such a way, please contact us as per the details provided below.

3. Who do we share your personal information with?

We disclose your personal information to such employees or appointees of Malloch Melville to the extent that it is necessary to enable us to provide you with the services as described above. Where we are obliged to disclose or share your personal data to comply with any legal or regulatory reasons, we may do so without your consent. In case of a reorganisation or sale of the Company the data may be transferred to such entity and will be continued to be used as described above.

4. Transferring your personal information

We reserve the right to transfer your personal information to servers located outside the EEA so they may process your personal information on our behalf. If you use Malloch Melville's website or provide us with your personal information, you agree to us in doing so in accordance with the terms of this policy and applicable data protection laws and regulations. You should be aware that many countries do not afford the same legal protection that you might enjoy in your country of origin. However, outside of any lawful requests to access your data by any legal or supervisory bodies, we confirm that anyone processing your personal information outside your country of origin is required to implement measures to protect it and is only entitled to process it in accordance with Malloch Melville's instructions.

5. Safeguarding your personal information

We take all reasonable endeavours to ensure that your personal information is secure and require any third parties that handle or process your data to do the same. Access to your personal information is restricted on a need to know basis among Malloch Melville employees and appointees and is designed to prevent unauthorised access, modification or misuse.

6. Your privacy rights and who to contact

If you have any questions, comments or concerns about Malloch Melville's handling of your personal data, you may contact us by writing directly to us at our business address Exchange Place 2, 5 Semple Street, Edinburgh, Mid Lothian, EH3 8BL or by calling us at 0131 510 6634. To expedite any such requests please provide us with your full name and email.

You have the right to tell us if:

- You do not wish for us to contact you in future
- You would like to know the details of personal information we hold on you
- You would like us to correct, update or delete your personal information held in our records
- You wish to report any misuse of your personal information

7. Changes to our privacy policy

We may change the details of this policy from time to time by posting updated version of this policy on Malloch Melville's website. We will provide you with reasonable notice of any material changes and we encourage you to frequently visit to stay up-to-date with how we use your personal information.

8. Other Malloch Melville privacy policies

In addition to this privacy policy, Malloch Melville may process additional information provided to us by our clients. This is detailed in our application form and terms of business and can be made available on demand.

Last updated: 19th March 2020