

## Privacy Notice

### Who We Are

**Guardian Stockbrokers Limited** (*'we' or 'us' or 'our'*) collection and process your personal information in accordance with our day to day business activities to provide you with access to our products and services or where we act as an introducing broker, make arrangements to introduce you to third parties such as "Clearing Brokers" (who under their own terms or conditions) to enable you to access their own products and services.

Your privacy is important to us and it is our policy to respect the confidentiality of your information. In accordance with the relevant Data Protection Regulation (through the implementation of the General Data Protection Regulation), this notice outlines how we use and manage your personal information provided to us by you or a third party in connection with the provision of our services. Additionally, this notice provides you with the necessary information regarding your rights and obligations, and explains how, why and when we collect and process your personal data.

Our registered office is **Tallis House, 2 Tallis Street, London, EC4Y 0AB** and we are a company registered in England and Wales under company number 06756375. We are registered on the Information Commissioner's Office Register of Data Controllers under registration number **Z1690166**, and act as the data controller and data processor. We have appointed a designated Data Protection Officer, who reports to the Guardian Stockbrokers Board of Directors, and can be contacted using the contact details below at the foot of this notice.

### Information That We Collect

We collect and process your personal information as part of our on-line or paper based application processes (as updated from time to time) to access our products and services or those provided by third parties who we may introduce you to. We may also collect your personal information for marketing purposes where you request market information or product brochures from our website or via our marketing channels.

In addition we may obtain information about you from third parties either those acting on your behalf or where you have consented, third party marketing lists, or through a referral.

The personal data that we collect from our customers or potential customers is summarised below:

- Name
- Date of Birth and gender
- Home Address and contact details
- National Insurance Number or other National Identifier Number for non-UK Residents or Nationals
- Passport Number and / or Driver's License Number
- Employment / Professional occupation details
- Information about your income and savings including details about your assets and liabilities, account balances, trading statements, tax and or other forms of financial statements
- Information relating to your trading experience and investments objectives
- Bank account details (where you subscribe to, or where we provide you with some of our products or services)

### IP Addresses or location data and Cookies

We may collect information about your computer, including where available your IP address, operating system and browser type, for system administration and to report aggregate information to our advertisers. This is statistical data about our users' browsing actions and patterns, and does not identify any individual.

Our website uses cookies. This helps us provide you with a good experience when you browse our website. For detailed information on the cookies we use and the purpose for which we use them see our Cookie Policy, which is available on our website [www.guardianstockbrokers.com](http://www.guardianstockbrokers.com).

## How We Use Your Personal Data

We take your privacy very seriously and will never disclose, share or sell your data without your consent, or we are required to do so as part of providing access to our products or services including those of third parties who we may introduce you to or where we are required to do so by law. We only retain your data for as long as is necessary, subject to any regulatory requirements and for the purposes specified in this notice.

### *The purposes and reasons for processing your personal data are detailed below: -*

- We collect your personal data in the performance of a contract or in order for us to provide our services, for example to be able to contact you or where we act on your behalf under a power of attorney to place orders for execution with other parties. Where required in order to provide our services we may share this information with third parties who we have an agreement with to provide services to you such as IG where we act as an Introducing Broker or Dolfin Financial (UK) Limited who provide the execution, settlement and custody service in accordance as part of our Tier One Investor Visa Investment Services, or any other partners who we may introduce you to access their products or services.
- We collect and store your personal data as part of our legal obligations for example to comply with our regulatory or statutory obligations such as the rules or guidance issued by, or outlined by the Financial Conduct Authority, which may include obtaining and assessing any information you provide when applying for us our services, or as often as required if you are a potential investor.
- Prior to us providing our services and where required, we have a legal obligation to collect your personal data in order to verify your identity and to perform other anti-money laundering or fraud checks to enable us to comply with UK Money Laundering Regulations and other regulatory requirements.
- We may collect and process your personal information to send you marketing communications by email or phone or by any other agreed means to enable us to keep up to date with our products and services or where we launch any new similar investment products or services which we believe may be of interest to you. Where we do so, we will do so where it is in our legitimate interests or with your consent. Please note that you have the right to request to cease or withdraw your consent to receive such communications at any time by using the opt-out/subscribe options or by contacting us directly.
- Where you have consented to us providing you with promotional offers and marketing, you are free to withdraw consent or restrict our processing of your data at any time.

## Profiling

We may process your personal data that we have collected about you to form profiles about you so that we can provide you with the appropriate products and services. In addition, we may also make decisions about you through automated profiling or automated identity authentication (including credit) checks which may affect your eligibility to use or access our products and services. We may need to do this either to perform our legal obligations or because it is in our legitimate interest to use your personal information in such a way.

## Your Rights

You have the right to access any personal information that **we** process about you and to request information about: -

- What personal data we hold about you
- The purposes of the processing
- The categories of personal data concerned
- The recipients to whom the personal data has/will be disclosed
- How long we intend to store your personal data for
- If we did not collect the data directly from you, information about the source

If you believe that we hold any incomplete or inaccurate data about you, you have the right to ask us to correct and/or complete the information and we will strive to update/correct it as quickly as possible; unless there is a valid reason for not doing so, at which point you will be notified.



You also have the right to request erasure of your personal data or to restrict processing in accordance with data protection laws, as well as to object to any direct marketing from us and to be informed about any automated decision-making that we use. If we receive a request from you to exercise any of the above rights, we may not always be able to comply with your request should be subject to any regulatory or statutory obligation to retain your data for a specified time frame. In addition, we may ask you to verify your identity before acting on the relevant request; this is to ensure that your data is protected and kept secure.

### **Sharing and Disclosing Your Personal Information**

We do not share or disclosure any of your personal information without your consent, other than for the purposes specified in this notice or where there is a legal or regulatory requirement for us to do so. We use a number of third parties that provide services to us and to assist us in providing our services to you. As a result, of these arrangements we may transfer your personal information outside the European Economic Area to these third parties who may process your data. All processors acting on our behalf only process your data in accordance with our instructions and comply fully with this privacy notice, the data protection laws and any other appropriate confidentiality and security measures.

**We** take your privacy seriously and we take every reasonable measure and precaution to protect and secure your personal data. We work hard to protect you and your information from unauthorised access, alteration, disclosure or destruction.

### **Consequences of Not Providing Your Data**

You are not obligated to provide your personal information us, however as this information is required for us to provide you with our services by law and / or in our legitimate interests, we will not be able to offer some/all of our products or services without it.

### **How Long We Keep Your Data**

**We** only ever retain personal information for as long as is necessary and we have strict review and retention policies in place to meet these obligations. If we hold any personal information in the form of a recorded communication, by telephone, electronic, in person or otherwise, this information will be held in line with UK regulatory requirements, which will either be 5 years or seven years after our business relationship with you has ended or where we are instructed otherwise by any regulatory authority.

Where you have consented to us processing your data in order to provide you with marketing communications, we will keep such data until you notify us or withdraw your consent. Where you opt out of receiving marketing communications from us we will suppress your details so that we are able to ensure that you don't continue to receive these communications.

### **Changes to our Policy**

From time to time, we may amend this privacy policy statement to reflect changes in the law, as a result of guidance from the UK Information Commissioner, changes to our corporate structure (including any administrative arrangements) or as a result of other legitimate reasons. We will do this by posting the amended privacy statement on our website and therefore we suggest that you check our website from time to time to make sure that you are aware of the latest version.

### **Lodging a Complaint**

If you wish to raise a complaint regarding the processing of your personal data or are unsatisfied with how we have handled your information, you have the right to lodge a complaint with the Information Commissioners Office.

The Data Protection Officer, Guardian Stockbrokers Ltd, Tallis House, 2 Tallis Street, London, EC4Y 0AB  
Tel: 020 7638 6996, **Email:** [Info@guardianstockbrokers.com](mailto:Info@guardianstockbrokers.com)

The Information Commissioners Office  
**Tel:** 0303 123 1113  
<https://ico.org.uk/about-the-ico/news-and-events/press-office/>