

# PRIVACY NOTICE

**HARGREAVES  
LANSDOWN**

**Last updated: 16 July 2019**

Hargreaves Lansdown takes the privacy and security of your personal information very seriously, and we're committed to protecting and respecting your privacy.

As Hargreaves Lansdown, we include the entities we've listed below in section 1 ("Who we are"). When we use "Hargreaves Lansdown", 'we', 'our' or 'us' throughout this Policy, we're referring to any one of our entities. All our legal entities are registered in England and Wales, and all may act as data controller of your personal information.

Our Privacy Policy explains which personal information we collect from you, how we store it and use it. It also covers how we treat information you give to us, and information we take from third parties. It contains important information about your rights. We hope you read the Policy carefully so you understand and feel comfortable with how we treat your personal information. By engaging with us in the ways set out in this Policy, you confirm that you have read and understood the entirety of this Policy, as it applies to you.

**Please note:** if you opt to receive the Full Financial Advice service a separate Privacy Notice will apply. This will be communicated to you at the time you begin receiving this service.

We recognise that there are risks to you with us processing your personal information, such as financial loss if there is a security breach. You can find out more information about our security measures in section 4.

We are always looking to improve the information we provide to our customers and contacts so if you have any feedback on this Policy, please let us know using our contact details in section 15.

## **We explain in this Policy:**

1. Who we are
2. Collecting your information
3. How we use your information
4. Information security
5. Our legal basis for using your information
6. How and when we share your information
7. Transfers outside of Europe

8. How long we store your personal information
9. Marketing
10. Your rights
11. Using our websites
12. Cookies
13. Updating this Privacy Policy
14. Contacting us

Your rights to object: You have various rights in respect of our use of your personal information as set out in sections 9 and 10. Two of the fundamental rights to be aware of are that you may:

- a) ask us to stop using your personal information for direct-marketing purposes. If you exercise this right, we will stop using your personal information for this purpose.
- b) ask us to consider any valid objections which you have to our use of your personal information where we process your personal information on the basis of our, or another person's, legitimate interest.

You can find out more information in sections 9 and 10.

## **1. WHO WE ARE**

This Privacy Policy is provided on behalf of all of the Hargreaves Lansdown entities listed below. All these entities individually may process your personal information:

Entity	Registration number
Hargreaves Lansdown plc	02122142
Hargreaves Lansdown Asset Management Limited	01896481
Hargreaves Lansdown Advisory Services Limited	03509545

The registered office for all of our legal entities is: One College Square South, Anchor Road, Bristol BS1 5HL.

This Policy also applies to the websites that Hargreaves Lansdown operates as described in section 11.

## **2. COLLECTING YOUR INFORMATION**

We collect and process your information in these circumstances:

- a) When you give us your personal information by phone, email, and via our

websites, in writing or otherwise. This includes but isn't limited to information you give us in connection with advisory services we provide to you relating to the closure of your Equitable Life with-profits fund, when you register for email alerts, or when you enter a promotion or survey. The information you give us can include your name, address, email address and other contact information. It can also include your financial and debit card information and other personal details such as health information.

b) When you visit our premises: Because of our security policies and procedures in our office premises, we will collect images of visitors using CCTV footage.

c) When you visit our website: When you visit our websites we automatically collect information which includes: the Internet Protocol (IP) address used to connect your computer to the internet, your login information, your geographic location, your browser and browser plug-in type and version, and your operating system and platform. We also collect information about your visit, including the source of your visit, and the full click path and mouse movement through our sites (including date and time). This includes the services you viewed, searches you made on our sites, page response times, download errors, length of visits to certain pages, page interaction information (such as page scrolling, mouse clicks, mouse movements and keyed text), and how you navigated away from any page and any phone number you use to call our Helpdesk. We collect this type of information using a website recording service.

d) When we email you: From time to time when you open an email we've sent you, we automatically collect information including your geographic location, browser type and version, the device, and the operating system and platform you're using. We also collect information about your email consumption, including the full click path from within and on to our sites (including date and time), and whether you opened, deleted, forwarded, printed or unsubscribed from the email, and also how long the email was open.

e) When we receive your information from third parties. We will receive information about you from The Equitable Life Assurance Society in order to provide advisory services to you relating to the closure of your Equitable Life with-profits fund. This will include your personal and investment data at the point you engage with this service. Where you provide additional information to third party service providers, such as name and contact information in the meeting booking service (JRNLI), we will also receive this information. We may also receive data from third parties such as payment service providers or analytics providers.

If we don't receive all of the personal information we've requested from you, then we may not be able to provide our services to you.

Some of the personal information that we collect about you or which you provide to us about you or your family members may be special categories of data. Special categories of data include information about physical and mental health, sexual orientation, racial or ethnic origin, political opinions, philosophical belief, trade union membership and biometric data. We take special care with this data.

### 3. HOW WE USE YOUR INFORMATION

We use your personal information in the following ways:

- To provide you with our services and/or information you request from us. This also includes carrying out any obligations specified in any contracts between us.
- To get quotations or arrange investments or insurance for you in connection with the closure of your Equitable Life with-profits fund.
- If you engage our services for someone else, acting with power of attorney, we'll use the information you give us about the applicant (including information about the applicant's mental health) and your role as the attorney to provide the service you request.
- To comply with our legal and regulatory obligations, co-operate with the court service, our regulators and law enforcement agencies and to prevent and detect crime.
- To check instructions you've given us or to resolve disputes including to establish, exercise or defend our legal rights.
- To improve the quality of our services and to train our staff.

- To let you know about any changes we make to our service.
- To confirm your identity and address, which includes using automated decisions when we carry out financial crime checks.
- To request your feedback on our service via a third party we've chosen (we'll only share your name and email address).
- Gathering data for analysis and research, and to provide management information or other services internally and to third parties. We will provide management information to The Equitable Life Assurance Society about your use of our advice service.
- To communicate any updates to your personal information to The Equitable Life Assurance Society.
- To administer our sites and for internal operations, including troubleshooting, data analysis, load management, testing, research, statistical and survey purposes.
- To improve our sites to make sure that our content is as effective as we can for you and for your computer.
- As part of our efforts to keep our sites safe and secure and to prevent and detect money laundering, financial crime and other crime.
- To monitor, record, store and use any telephone, email or other communication with you. We'll update your records with any new information you or a third party give us, and we'll add it to any information we already have.
- When you call us we'll collect the Calling Line Identification information and keep a copy of the call for training and security purposes. We'll also use your information to help improve our efficiency and effectiveness.
- To deal with any enquiries or issues you have about how we collect, store and use your information, or any requests made by you for a copy of the information we hold about you.
- For internal corporate reporting, business administration, ensuring adequate insurance coverage for our business, ensuring the security of company facilities, research and development, and to identify and implement business efficiencies.

### 4. INFORMATION SECURITY

We take the security of your personal data very seriously, and we use appropriate technologies and procedures to protect your personal information.

We keep our data security policies and procedures up to widely accepted

international standards. In addition, we review our policies regularly and update them whenever needed to protect you, and to meet our business needs, changes in technology, and regulatory requirements.

Here are examples of the ways we protect your data:

- a) We have appropriate technical and organisational measures in place to protect you against accidental loss and unauthorised access, use, destruction or disclosure of your data.
- b) We have a business continuity and disaster recovery plan that is designed to help us offer our services and protect our people and assets no matter what happens.
- c) We place appropriate restrictions on access to personal information.
- d) We implement measures and controls, including monitoring and physical measures, to store and transfer data securely.
- e) We complete data protection impact assessments in accordance with legal requirements and our business policies.
- f) We provide data security training for our employees.
- g) We use a stringent approach to vendor risk management.

The internet is an open medium and we can't guarantee that any information you send to us by email or via our sites won't be intercepted or tampered with. Any transmission is at your own risk. To help protect your personal information and minimise the risk of it being intercepted by unauthorised third parties, our secure servers use Secure Socket Layer v3 (SSL) or Transport Layer Security v1 (TLS) encryption when you submit information to us through our sites. You can see this security is in place when you see "https" and the padlock on your URL bar. Older browsers don't always support current SSL technology, so we recommend that you use an up-to-date browser. Once we've received your information, we use strict procedures and security features to try to prevent unauthorised access. For more information please visit our [security centre](#).

## 5. OUR LEGAL BASIS FOR USING YOUR INFORMATION

Our legal basis for collecting and using your personal information depends on the exact type of information and how and when we collect it. However, we'll normally only collect personal information from you, The Equitable Life Assurance Society, or another third party where one of the following applies:

- a) we need your personal information to perform a contract with you (for example to provide our advisory services);
- b) it's in our legitimate interests or the legitimate interests of others (for example, to ensure the security of our website). Our legitimate interests are to:
  - i. run, grow and develop our business;
  - ii. ensure a safe environment for our staff and website visitors;
  - iii. conduct marketing, market research and business development;
  - iv. provide client services; and,
  - v. conduct internal group administration.

If we rely on our (or another person's) legitimate interests for using your personal information, we will undertake a balancing test to ensure that our (or the other person's) legitimate interests are not outweighed by your personal interests or fundamental rights and freedoms which require protection.

- c) we have your consent (for example you have ticked a box on a form):  
We may use your special categories of data (such as health information) where you have provided your consent (which you may withdraw at any time after giving it, as described below).

If we rely on your consent for us to use your personal information in a particular way, but you later change your mind, you may withdraw your consent by contacting us and we will stop doing so.

- d) we have a legal obligation to collect your personal information (such as for FCA regulations).

## 6. HOW AND WHEN WE SHARE YOUR INFORMATION

We'll share your personal information with other members of the Hargreaves Lansdown Group listed in section 1 to help us to better understand yours and

other client's needs, administer your services and improve our products and services. This could be, for example, client modelling, or statistical and trend analysis.

We also share your information with the following third parties: partners, suppliers, sub-contractors including but not limited to payment service providers, our professional advisors such as lawyers, auditors, insurers and information, service and software providers that help us improve and optimise our sites.

Our reasons for sharing your information with these service providers include:

- a) To uphold our part of any contract we enter into with them or you. We will share management information including details of the services we have provided to you, your advice journey, and any updates to your personal data with The Equitable Life Assurance Society as part of this service.
- b) To enforce or apply our statutory disclosures or any other agreement or to protect the rights, property or safety of our sites, our users or others.

We will also disclose your information to third parties:

- a) where it is in our legitimate interests to do so to run, grow and develop our business;
- b) if substantially all of our assets are acquired by a third party, in which case personal information held by us will be one of the transferred assets;
- c) if we are under a duty to disclose or share your personal information: in order to comply with any legal obligation, any lawful request from government, judicial bodies or agencies to make sure we comply with our legal and regulatory obligations; with law enforcement officials; and as may be required to meet national security or law enforcement requirements or prevent illegal activity; to work with fraud prevention agencies, other companies and organisations to prevent or detect financial and other crime.

- d) in order to enforce or apply our service terms and conditions or any other agreement or to respond to any claims, to protect our rights or the rights of a third party, to protect the safety of any person or to prevent any illegal activity; or

- e) to protect our rights, property, or safety and that of our staff, our customers or other persons. This may include exchanging personal information with other organisations for the purposes of fraud protection and credit risk reduction.

When we share your information with third parties, we make sure the appropriate safeguards are in place to protect your personal information.

We will never sell, trade, or rent your personal information to anyone.

We may also disclose and use anonymised, aggregated reporting and statistics about users of our website or our services for the purpose of internal reporting or reporting to our group or other third parties. None of these anonymised, aggregated reports or statistics will enable our users to be personally identified.

## 7. TRANSFERS OUTSIDE OF EUROPE

We usually store your information on our secure servers in the United Kingdom.

However, where we use third parties to process your information for us, for any reason detailed in our Service Terms and Conditions, we may transfer, store, or process it inside or outside the European Economic Area.

Our partners and service providers may also transfer your personal information outside of the European Economic Area.

We'll take all steps reasonably necessary to make sure that your personal information is treated securely. For example, as permitted by Article 46 of the General Data Protection Regulation, we use standard contractual clauses with third parties, so that your information is protected to the same standards as it is in the European Economic Area. If your information is sent to the US, in accordance with Articles 45 and 46 of the General Data Protection Regulation we make sure it goes to an organisation that is part of the Privacy Shield or that we use standard contractual clauses with third parties, so that your information is protected to the same standards as it is in the European Economic Area. Privacy Shield is the framework that sets privacy standards for information sent between US and EU countries, and it uses similar standards as the European Economic Area.

## 8. HOW LONG WE STORE YOUR PERSONAL INFORMATION

We keep the personal information we collect from you, The Equitable Life Assurance Society, and other third parties, where we have an ongoing legitimate business need to do so (for example, to provide you with a service you have requested or to comply with applicable legal, tax or accounting requirements).

We keep all records for a minimum of ten years from when our relationship ends, or from when your records were provided to us (whichever is longer). We can use it to respond to any questions or complaints, to maintain records according to rules that apply to us, or for fighting financial crime, including fraud.

In certain circumstances, we will keep your information for longer than ten years - for example if we can't delete it for technical reasons or for compliance with our legal and regulatory obligations. If your personal information is kept for longer than ten years for research and statistical purposes it will be anonymised.

When we have no ongoing legitimate business need to hold your personal information, we will either delete or anonymise it. If we can't do this (for example, because your personal information is stored in backup archives), we'll securely store your personal information, only use it for a purpose we've already communicated to you, and isolate it from any further processing until archives are deleted.

Where we process information on behalf of other organisations we apply the same retention periods as above.

## 9. MARKETING

We will not collect or use your personal information for undertaking marketing activities. You will however receive communications relevant to our advice service.

## 10. YOUR RIGHTS

a) Right of access: You have the right of access to any personal information we hold about you. You can ask us for a copy of your personal information; confirmation whether your personal information is being used by us; details about how and why it is being used; and details of what safeguards are in place if we transfer your information outside of the European Economic Area.

b) Right of to update your information: If any of the information we hold is inaccurate, you can ask us to make any necessary amendments.

c) Complaints: If you have any complaints or concerns about our handling of your personal information please do get in touch with us and we will do our best to resolve these. You can contact us on 0117 900 9000 or you write to us at the address below in section 15.

In accordance with Article 77 of the General Data Protection Regulation, you have the right to complain about our collection and use of your personal information to the Information Commissioner's Office or the data protection authority in the country where you usually live or work, or where the alleged infringement of the General Data Protection Regulation has taken place. For more information, please contact the local data protection authority at: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF or by phone on 0303 123 1113.

You may also seek a remedy through local courts if you believe your rights have been breached.

In certain specific circumstances you also have following further rights:

a) Right of deletion: You have a right to ask us to delete any personal information which we are holding about you.

b) Right to restrict use of your information: You have a right to ask us to restrict the way that we process your personal information.

c) Right to data portability: You have a right to ask us to provide your personal information to a third party provider of services.

d) Right to object. You have a right to ask us to consider any valid objections which you have to our use of your personal information where we process your personal information on the basis of our or another person's legitimate interest.

e) Right to stop marketing: Under GDPR you have a right to ask us to stop using your personal information for direct-marketing purposes. However, as per above, we will not use your personal data for direct marketing purposes.

We will consider all such requests and provide our response within a reasonable period (and in any event within one month of your request, unless we tell you we are entitled to a longer period required by applicable law). Please note, however, that certain personal information may be exempt from such requests in certain circumstances, for example if we need to keep using the information to comply with our own legal obligations or to establish, exercise or defend legal claims. If an exception applies, we will tell you this when responding to your request. We may request you provide us with information necessary to confirm your identity before responding to any request you make.

Please contact us using the details below in section 15 if you would like further information. If you would like to exercise any of your rights you can contact us on 0117 900 9000 or you write to us at the address below in section 15.

## 11. USING OUR WEBSITES

The website relevant to this service is: [www.hl.co.uk/equitable-advice](http://www.hl.co.uk/equitable-advice)

This Policy applies when you use the above website and its content. Partners who provide content or other linking sites found on our websites can also gather information and you should check their privacy notices.

If you visit our website you acknowledge that the practices described in this Policy apply. Our site can, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please remember that they have their own policies and that we do not accept any responsibility or liability for their policies or how they collect and use your information.

## 12. COOKIES

Our websites use cookies. Cookies are small files stored on your computer's hard drive, which are used to collect your personal information. You can choose to refuse cookies but that can mean you can't view or use all of our website. For detailed information on the cookies we use, how we use them, and how to refuse them, please see our cookie policy.

### **13. UPDATING THIS PRIVACY POLICY**

We will update or amend this Policy from time to time, to comply with law or to meet our changing business requirements. You should bookmark and periodically review this page to make sure that you are familiar with the most current version and so you're aware of the information we collect, how we use it and under what circumstances we disclose it. You can see when our most recent update to this Privacy Policy was by checking the "Last updated" note at the top of this Privacy Policy. If we need to make substantial changes to this Policy, we will notify you, if we hold your contact details, by post or by email, before we make any changes unless we are required to make the change sooner (for example regulatory reasons).

### **14. CONTACTING US**

If you have any questions about your privacy with us or this Policy, you can email us, write to us at Hargreaves Lansdown, Data Protection Officer, One College Square South, Anchor Road, Bristol BS1 5HL or call us on 0117 900 9000.