

Raymond James Branch Principal, Wealth Manager and Investment Management Platform Firm Privacy Notice

Introduction

Raymond James Investment Services Limited whose registered office is at Ropemaker Place, 25 Ropemaker Street, London, England EC2Y 9LY ("**Raymond James**" or "**we**" or "**our**") is committed to respecting the privacy of individuals.

This Privacy Notice ("**Notice**") and any other documents referred to in it, set out the basis on which we process personal data, why we collect, store, use and share personal data, your rights in relation to your personal data. For the purposes of applicable data protection laws (in particular, the retained EU law version of the General Data Protection Regulation ((EU) 2016/679) (the "**GDPR**")), generally, the party who you deal with is the data controller.

The Data Protection Officer for Raymond James Investment Services Limited is Rob Patchett (Global Chief Privacy Officer and I.T Chief Compliance Officer). You may contact Rob Patchett sending an email to RJEUPrivacy@raymondjames.com.

Personal Data We Collect

We may collect and process the following personal data:

Information You Give Us:

If you are or apply (directly or indirectly) to become a Branch Principal, Wealth Manager, or Investment Management Platform Firm or are an employee of a Branch Principal, Wealth Manager, or Investment Management platform Firm we may process your name, address, email address, date of birth, telephone number, financial information (such as bank statements and bank account details), registration/identification (such as Financial Conduct Authority number) numbers, previous employment details, employer references and ID documents.

We will also collect the personal information requested in the 'Long Form A – UK and Overseas Firms (not Incoming EEA) for MiFID authorisation applications', as mandated by the FCA. This includes, for example, personal data concerning identification details, controlled functions, employment history for the previous 10 years, and fitness and propriety checks (e.g. criminal convictions, civil proceedings, employment matters, regulatory matters, conflicts, any supplementary information you or we believe is relevant and details of why you are competent and capable).

This list is not exhaustive.

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, login information, browser type and version, time zone setting, browser plug-in types

- and versions, operating system and platform;
- if you visit one of our Branches, we may collect your physical image through our use of CCTV cameras;
 - if you visit our website, we may collect your IP address and/or use cookies to gather further information about your use of our site. Further information about our use of Cookies is contained in our [Cookies Policy](#);
 - information about your visit to our website such as the products and/or services you searched for and view, 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
 - telephone call information, as it is standard practice at Raymond James, that we will record all external calls for training, compliance, security and evidentiary purposes even where these calls fall outside of our regulatory obligations.

This list is not exhaustive.

Information We Receive From Other Sources:

Raymond James may also collect personal data about you from third parties, such as from recruitment agencies, medical professionals, references supplied by former employers, from providers that conduct background checks, and information from criminal records checks. Raymond James may seek information from third parties only once a job offer to you has been made and will inform you that it is doing so.

At present Raymond James does not undertake any automated decision making processes which could result in a negative consequence.

This list is not exhaustive.

Information About Other People

If you provide information to us about any person other than yourself, such as candidates, your relatives, next of kin, your advisers or your suppliers, you must ensure that they understand how their information will be used, and that they have given their permission for you to disclose it to us and for you to allow us, and our outsourced service providers, to use it.

This list is not exhaustive.

Special Category Personal Data:

In certain limited cases, we may collect certain special category personal data from you (that is, information about your racial or ethnic origin, political opinions, religious beliefs, trade union activities, physical or mental health, sexual life, or details of criminal offences, or genetic or biometric data). However, we will only do so on the basis of your explicit consent.

How We Use Personal Data?

When we ask you to supply us with personal data we will make it clear whether the personal data we are asking for must be supplied so that we can provide the products and services to you, for you to provide products or services to us, or whether the supply of any personal data we ask for is optional.

Consent:

We only process your sensitive personal data when we have obtained your explicit consent to do so. You have the right to withdraw your consent at any time by contacting us using the contact information provided below.

This list is not exhaustive.

Contract Performance

We may use your personal data to fulfil a contract, or take steps linked to a contract:

- to provide products and/or services to you or in relation provide products and/or services you provide to us; and
- to communicate with you in relation to the provision of the contracted products and services; to provide you with administrative support such as account creation, security, and responding to issues; and provide you with industry information, surveys, information about events, offers and promotions, related to the products and/or services.

This list is not exhaustive.

Legitimate Interests

Where this is necessary for purposes which are in our, or third parties, legitimate interests. These interests are:

- providing you with newsletters, surveys, information about our awards and events, offers, and promotions, related to products and services offered by Raymond James (or a group company) which may be of interest to you and managing any interest;
- communicating with you in relation to any issues, complaints, or disputes; improving the quality of experience when you interact with our products and/or services, including testing the performance and customer experience of our website;
- performing analytics on sales/marketing data, determining the effectiveness of promotional campaigns;
- for marketing and events purposes such as a Raymond James professional Development Forum; and
- to administer relationships and provide services to Raymond James clients.

This list may not be exhaustive.

You have the right to object to the processing of your personal data on the basis of legitimate interests as set out below, under the heading: Your Rights.

Where Required By Law

We also process your personal data if required by law, including registering your details with relevant regulatory bodies, governmental or quasi-governmental bodies; responding to requests by regulatory bodies, government or law enforcement authorities, or for the prevention of crime or fraud.

This list is not exhaustive.

With Whom Do We Share Personal Data?

We may share your information across our group entities and internally.

Raymond James Investment Services Limited is a member of the London Stock Exchange and is authorised and regulated by the Financial Conduct Authority. Registered in England and Wales number 3779657. Registered Office Ropemaker Place 25 Ropemaker Street London EC2Y 9LY.

We take all reasonable steps to ensure that our staff protect your personal data and are aware of their information security obligations. We limit access to your personal data to those who have a genuine business need to know it.

We may also share your personal data with trusted third parties including:

- legal and other professional advisers, consultants, and professional experts;
- service providers contracted to us in connection with provision of the products and services such as providers of IT services, customer relationship management services, other Raymond James Wealth Managers, fund and product providers or similar parties; and
- analytics and search engine providers that assist us in the improvement and optimisation of our website;
- If we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets; and/or
- If we, our business, or our assets are acquired by a third party, in which case personal data held by it about its users, suppliers, or customers will be one of the transferred assets.

We will ensure there is a contract in place with the categories of recipients listed above which include obligations in relation to the confidentiality, security, and lawful processing of any personal data shared with them.

We, or trusted third parties on our behalf, may contact you by email or post with information about products and services that might be of interest to you. Where necessary, at the time that you provide your personal data to us, you will be given the opportunity to indicate whether or not you are happy for us to use your personal data in order to tell you about such products or services.

You can unsubscribe from this at any time by clicking on the link provided in the relevant email, or by emailing us using the contact details provided below.

Where a third party recipient is located outside the UK, we will ensure that the transfer of personal data will be protected by appropriate safeguards, namely the use of standard data protection clauses adopted or approved by the Information Commissioner's Office/European Commission (as appropriate) where the data protection authority does not believe that the third country has adequate data protection laws.

We will share personal data 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 and other agreements; or if we reasonably consider this necessary; or to protect the rights, property of others.

We will share personal data with law enforcement or other authorities if required by applicable law, for example for the purposes of crime prevention and fraud protection.

How Long Will We Keep Personal Data?

We will retain your personal data for as long as we believe it necessary or desirable to fulfil our business purposes or to comply with applicable law, audit requirements, regulatory requests or orders from competent courts.

Where there is a contract between us, we will retain your personal data for the duration of the contract, and for a minimum period of 6 years following its termination or expiry, to ensure we are able to comply with any contractual, legal, audit and other regulatory requirements, or any orders from competent courts or authorities. We may store your data for longer.

Where you have consented to marketing communications, you may change your preferences or unsubscribe from marketing communications at any time by clicking the unsubscribe link in an email from us.

Your personal information may be converted into statistical or aggregated data which cannot be used to re-identify you. It will then be used to produce statistical research and reports. This aggregated data may be shared and used in all the ways described in this privacy notice though it may also be used in other ways not described here.

Where Do We Store Personal Data And How Is It Protected?

We take reasonable steps to protect your personal data from loss or destruction.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

Where you have a username or password (or other identification information) which enables you to access certain services or parts of our site, you are responsible for keeping this password confidential. 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 personal data transmitted to our site; any transmission is at your own risk. Once we have received your personal data, we will use strict procedures and security features to try to prevent unauthorised access.

Automated Decision Making

Employment decisions are not based solely on automated decision-making.

Your Rights

Under the GDPR, you have various rights with respect to our use of your personal data:

Right to Access

You have the right to request a copy of the personal data that we hold about you by contacting us at the email or postal address given below. Please include with your request information that will enable us to verify your identity. We will respond with 30 days of request. Please note that there are exceptions to this right. We may be unable to make all information available to you if, for example, making the information available to you would reveal personal data about another person, if we are legally prevented from disclosing such information or if your request is manifestly unfounded or excessive.

Right to rectification

We aim to keep your personal data accurate and complete. We encourage you to contact us using the contact details provided below to let us know if any of your personal data is not accurate or changes, so that we can keep your personal data up-to-date.

Right to erasure

You have the right to request the deletion of your personal data where, for example, the personal data are no longer necessary for the purposes for which they were collected, where you withdraw your consent to processing, where there is no overriding legitimate interest for us to continue to process your personal data, or

your personal data has been unlawfully processed. If you would like to request that your personal data is erased, please contact us using the contact details provided below.

Right to object

In certain circumstances, you have the right to object to the processing of your personal data where, for example, your personal data is being processed on the basis of legitimate interests and there is no overriding legitimate interest for us to continue to process your personal data, or if your data is being processed for direct marketing purposes. If you would like to object to the processing of your personal data, please contact us using the contact details provided below.

Right to restrict processing

In certain circumstances, you have the right to request that we restrict the further processing of your personal data. This right arises where, for example, you have contested the accuracy of the personal data we hold about you and we are verifying the information, you have objected to processing based on legitimate interests and we are considering whether there are any overriding legitimate interests, or the processing is unlawful and you elect that processing is restricted rather than deleted. Please contact us using the contact details provided below.

Right to data portability

In certain circumstances, you have the right to request that some of your personal data is provided to you, or to another data controller, in a commonly used, machine-readable format. This right arises where you have provided your personal data to us, the processing is based on consent or the performance of a contract, and processing is carried out by automated means. If you would like to request that your personal data is ported to you, please contact us using the contact details provided below.

Please note that there are exceptions to these rights, if, for example, we are under a legal obligation to continue to process your personal data. If we are unable to comply with your request due to an exception we will explain this to you in our response.

Contact

If you would like to contact us about this Notice, our use of your personal data, or about exercising any of your rights, please contact us by email at RJEUPrivacy@raymondjames.com or by writing to us at: Privacy Department, Raymond James, Ropemaker Place, 25 Ropemaker Street, London EC2Y 9LY.

Complaints

If you believe that your data protection rights may have been breached, and we have been unable to resolve your concern, you may lodge a complaint the applicable supervisory authority or to seek a remedy through the courts. Please visit <https://ico.org.uk/concerns/> for more information on how to report a concern to the UK Information Commissioner's Office.

Changes to our Notice

Any changes we may make to our Notice 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 this Privacy Notice.

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