

Raymond James General Privacy Notice

Introduction

Raymond James Investment Services Limited (Reg. No. 03779657) 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.

Raymond James Investment Services Limited and Raymond James Financial International Limited are separate "data controllers". This means that each entity is individually responsible for deciding how it will process your personal data.

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:

Personal information that we generally process regardless of how you contact us, or for what reason, includes:

- your title, full name, your contact details, including for instance your email address, home and mobile telephone numbers; and/or
- your home address, correspondence address (where different from your home address) and address history (usually only for current clients, or for new clients for identification, anti-money laundering, anti-fraud and credit reference agency checks);

This list is not exhaustive.

If you submit an application to become a client, in the process of becoming a client or are already a client of ours, in addition to the above personal information, we will collect the following from you:

- your date and place of birth and/or age;
- financial information, including your bank account information, the amount you are looking to invest, your total wealth, your investment objectives, income and employment status and any monthly payments you may be making, your investment selection(s) and how you would like income from your investment to be paid, reinvested/accumulated;
- proof of identification in the form of copies of your passport, driving licence or other identity documents like utilities bills;
- your tax residency and/or nationality;
- information around any financial dependants you may have;

- information around any assets and liabilities you have;
- information regarding the source/acquisition of your wealth;
- detailed information around your experience and knowledge of investments;
- information around your capacity for loss and your attitude to risk;
- personal information and contact information which you provide in correspondence with us, whether by email, written letter, or telephone call or through our online enquiry system or attendance notes of meetings or calls (this will be information volunteered by you, it could include the reasons why you have decided to invest, or where your investment money has come from, by way of example); and/or
- information relating to your use of our service;

This list is not exhaustive.

We collect the following information from you when required:

- for anti-money laundering, identity verification and negative news screening and the information returned to us from the organisations tasked with performing those checks (further information is provided below relevant to such checks);
- where you have an online account with us, such information that is used to secure your online account, the answers to security verification questions, your username and password;
- where you have tax reporting duties in other jurisdictions for which we are responsible, for example the United States of America, we collect information to allow us to carry out this reporting; and/or
- we provide a number of ancillary services which you may request we provide to you, an example being producing a Capital Gains Tax report, these services may require further information from you.

This list is not exhaustive.

Depending on how you engage with us, whether it be through our website, or by visiting one of our branches, we may also collect the following information:

- if you visit one of our Branches, we may collect your physical image through our use of CCTV cameras; and/or
- 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](#).

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:

We may also receive information about you if you use any of the other websites we operate or the other services we provide. Raymond James may also collect personal data about you from third parties such as wealth managers, related companies, recruitment agencies or your employer or through our services providers.

This list is not exhaustive.

Information about other people

If you provide information to us about any person other than yourself, such as your employees, 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?

Consent:

Sometimes we rely on your consent to use your personal information. We will rely on your consent

- when you request that we share your personal information with someone else and consent to that (for example if you engage the services of a professional adviser after you have become a client of ours and request that we provide information about your account to that professional adviser);
- where you have opted-in to receiving marketing communications (and have not subsequently opted-out or requested to be removed from any marketing list – which you can do by contacting us as set out below); and/or
- when you volunteer information to us in correspondence or during meetings where a attendance note is taken (for example if you provide a reason why you are cashing out a particular investment or why you are moving away from your existing adviser).

This list is not exhaustive.

You have the right to withdraw your consent at any time by contacting us using the contact information provided below.

Contract Performance

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.

Raymond James needs to process your data to take the necessary steps prior to entering into a contract with you. It also needs to process your data to enter into a contract with you

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; to communicate with you in relation to the provision of the contracted products and services;
- provide you with administrative support such as account creation, security, enabling payments exercising your rights 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:

- recording incoming and outgoing calls for training, monitoring, and security purposes, as well as to keep an accurate record of any instructions received from you in relation to your investments (this would be relevant where calls are not legally required to be recorded, but where we will record them anyways for the purposes listed above);
- administering and managing your investment account(s) and services relating to that, including, where necessary, updating your records and taking steps to update your contact address so we can contact you about your account;
- testing the performance of our products, services and investments to ensure that we are managing our clients, and your investments, to their best potential;
- to adhere to guidance and best practice under the regimes of governmental and regulatory bodies such as tax authorities, financial regulators/ombudsmen and non- financial regulators;
- for management and audit of our business operations including accounting. This includes allowing other Raymond James group entities to conduct audits into our processes;
- to determine the target market for our existing and future products (e.g. determining whether a product is meeting the needs of investors generally);
- providing you with newsletters, surveys, information about our awards and events, offers, and promotions, related to products and services offered by Raymond James or related party which may be of interest to you;
- providing the products and/or services to you or for you to;
- in relation to the provision of the contracted products and services;
- providing you with administrative support such as account creation, security, and responding to issues;
- providing you with industry information, surveys, information about us, events, offers and promotions, related to the products and/or services you received or provide.
- 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;
- send you newsletters, surveys, information about our awards and events, offers, and promotions, related to products and services offered by Raymond James or related party which may be of interest to you; and
- Developing, improving, and delivering marketing and advertising for products and services offered by Raymond James or group company.

This list is not 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 may also process your personal data if required by law, including verifying your identity, detecting fraud, complying with regulatory rules, dealing with requests from our auditors, combat illegal marketing practices, recording telephone calls for regulatory purposes, 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 personal data with Raymond James group companies.

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 and customer relationship management services; and
- analytics and search engine providers that assist us in the improvement and optimisation of our Website.

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.

Where a third party recipient is located outside the European Union, 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 European Commission where the data protection authority does not believe that the third country has adequate data protection laws.

We will share personal data with law enforcement or other authorities if required by applicable law.

How Long Will We Keep Personal Data?

Where there is a contract between us, we will retain your personal data indefinitely (but for a minimum of 6 years following the termination of your contract) to ensure we are able to comply with any contractual, legal, audit and other regulatory requirements, or any orders from competent courts or authorities.

Where you receive marketing communications from us, you may change your preferences or unsubscribe from

marketing communications at any time by clicking the unsubscribe link in an email from us.

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.

What If You Do Not Provide Personal Data?

You may also have to provide us with data in order to exercise your statutory rights. Failing to provide data may mean that you are unable to exercise your statutory rights or take up benefits that may be due to you.

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.