

Privacy Policy

Version Number : 1.0

Contents

1.	Introduction.....	3
2.	What Personal data do we collect about you and how?	3
3.	How do we use your Personal Data	3
4.	How do protect your Personal Data	3
5.	What are Cookies	4
6.	Accessing your Personal Data.....	4
7.	Summary	4

1. Introduction

Winterflood Business Services (**WBS, We, Our, Us**) take our obligations under the Data Protection Act 1998 and all other associated regulations very seriously. In that regard we have taken steps to ensure that we comply with all aspects of our obligations to protect your privacy and personal data. We understand that you have entrusted us to hold your personal information and we will do all that is necessary to ensure that the trust is not compromised in any way.

This Privacy Policy sets out the principles governing the collection and use of your personal data. Personal Data is information with which one would be able to identify a living individual. We would ask you to take the time to read this Privacy Policy carefully as this forms part of the agreement between you and us, in accordance with our General Terms and Conditions.

2. What Personal data do we collect about you and how?

In the course of carrying out our service on your behalf it is necessary to collect and store information about you. This will include information such as your name, address, age, gender, and contact details. All of this information collectively could be used to identify you as a living individual and therefore is deemed “personal data” under the Data Protection Act 1998.

3. How do we use your Personal Data

If you use our internet service to access your account and to effect transactions, encryption tools are used to protect your data. The personal information which you provide to WBS may be used for a number of different purposes:

- to administer the product or service for which you apply
- to comply with legal and regulatory requirements
- to identify you when you contact WBS
- for internal analysis and research
- to offer you investment services and products
- to help us develop new services and products.

4. How do we protect your Personal Data

Unless required by law, your personal information will not be passed to anyone without your permission. To comply with Money Laundering Regulations, WBS may need to request additional evidence of identity from you, and may use a credit reference agency for this purpose

Please note that the personal information which you provide will be processed by WBS or associated or affiliated companies, who may be based outside of the EEA. This may involve the transfer of data by electronic media including the internet.

Where your data is transferred outside of the UK, WBS will ensure that the recipient agrees to keep your information confidential and hold it securely in accordance with the

requirements of the Data Protection Act 1988.

E-mail addresses and fax numbers are not collected or used without your specific permission to do so.

5. What are Cookies

Cookies are harmless text files that web servers can store on your computer's hard drive when you visit a website. Fundamentally they enable the server to recognise you when you revisit.

There are two types of computer cookies: temporary and permanent. Temporary cookies, also called session cookies, are stored temporarily in your browser's memory and are deleted as soon as you end the session by closing the browser. Permanent cookies, also called persistent cookies, are stored permanently on your computer's hard drive and, if deleted, will be recreated the next time you visit the sites that placed them there.

Internet cookies are common and do not harm your system. Internet cookies simply store and gather site information. They help you do things like remembering internet logon details so you don't have to re-enter

Please note: that we do not use cookies but may at some point in the future

6. Accessing your Personal Data

In accordance with our General Terms and Conditions and our obligations under the Data Protection Act 1988 we remind you that you can request a copy of all your personal data that we hold. There will be a small charge for the provision of this information. If you would like to receive this information, please write to the address below;

**Data Protection Officer
Winterflood Securities Limited
The Atrium Building
Cannon Bridge House
25 Dowgate Hill
London
EC4R 2GA**

7. Summary

In accordance with this document we have robust policy and procedures in place which are designed to prevent, with a reasonable degree of certainty any failure to respect these principals and professional code of conduct. The WBS Privacy Policy is regularly reviewed for accuracy and compliant with any regulatory changes. We always seek to operate in a way that respects market integrity and puts customer interests first. The intangible principal of putting customers interest first is something that goes hand in hand with other measures taken and not least ensuring that we Treating Customers Fairly when handling your personal information.

This service is operated by Winterflood Business Services, a registered trading name of Winterflood Securities Limited. Winterflood Securities Limited is registered in England No.02242204. Registered office: The Atrium Building, Cannon Bridge House, 25 Dowgate Hill, London, EC4R 2GA. Member of London Stock Exchange. Authorised and regulated by the Financial Services Authority (FSA register number 141455).