

PRIVACY POLICY

How we use and protect your personal data

Last updated: June 2025

This Privacy Policy (Notice) describes your rights, the information or “Personal Data” we would usually collect and use and how we would protect it.

Who we are

Anderson Strathern Asset Management Limited (‘ASAM’) is committed to protecting and respecting your privacy. ASAM is a limited company (with company number SC376947) registered at 58 Morrison Street, Edinburgh, EH3 8BP. Any reference to ‘us’, ‘our’ or ‘we’ in this Privacy Policy is a reference to ASAM. Similarly, any reference to ‘you’, ‘your’, ‘yours’ or ‘yourself’ in this Privacy Policy is a reference to any of our past, prospective or current membership, employee, government, agency, partner, media or other public or industry contacts. Collectively “data subjects”.

Our business

We collect information about you when you engage us for financial planning and investment management services. This information will relate to your personal and financial circumstances including but not limited to:

- Information about you e.g. name, date of birth and contact details
- Information connected with correspondence with us e.g. emails, meeting notes and phone calls
- Information about you and your family’s financial affairs
- Information relating to a service or product e.g. bank details
- Information provided by you about another individual
- Information regarded as “special category data” such as health. This will only be collected if necessary for the provision of our services.

Why we need to collect your information

The information that we collect about you is required to enable to carry out the services that you require from us. Without collecting your personal data, we would be unable to fulfil certain legal, regulatory and contractual obligations. Where special category data (e.g. details about your health) is required we will obtain this directly from you explaining why it is necessary for us to obtain that information.

We will only ever collect and use your personal information for the purposes we have agreed with you in our terms of business or otherwise with your explicit consent. We will do this in a fair and lawful manner.

How we collect your personal information

We may collect personal information directly from you, using methods such as:

- Information Forms and contact forms on our website
- Completion of fact finds and similar activities
- Our records of meetings/letters/emails/telephone conversations
- Provision of information to us by you via third-party methods, such as secure messaging
- Provision of information to us by you in paper or electronic forms (such as bank statements)
- We will also obtain information about you from some of the third parties we share or obtain data with (such as providers of financial products or platform hosts) but will only do this where it is necessary to provide services to you or to comply with legislation.

How we use your personal information

We will only ever collect and use your personal information for the purposes we have agreed with you in our terms of business or otherwise with your explicit consent. We will do this in a fair and lawful manner.

What personal information are we collecting and using?

Personal Data

Examples of the personal data we may require to enable us to undertake our business of providing you with financial services are:

- Your personal information (for example, your name and date of birth)
- Contact details (for example, your postal address, phone number, email address or mobile number)
- Customer relationship data (for example, notes of calls or requests you may have made or attendance at an event or webinar)
- Financial information (for example, bank account numbers, existing financial products, debts, liabilities, assets)
- Economic crime related information (e.g. financial crime and fraud information)
- Education and employment information
- Visual images and personal appearance (such as copies of passports or CCTV images)
- Information about your family, lifestyle and social circumstances (such as dependants, marital status, next of kin and contact details)
- Information about connected individuals, such as Powers of Attorney or Guardians

Sensitive Data

On occasion the following special category (sensitive) personal data may be obtained: physical or mental health details, political opinion, racial or ethnic origin and religious beliefs. We will only obtain and process this information with your consent (permission) or in situations where it is in the wider public interest.

Connected Third Parties

If you choose to provide us with any personal data relating to a third party (for example, information relating to your spouse, children, parents, and/or employees) or ask us to share their personal data with third parties by submitting such information to us, you confirm that they understand the information in this notice about how we will use their personal data.

Monitoring of Communications

As a matter of course, ASAM may record and monitor the use of company communications equipment by its employees and other staff. This means that when you speak with your financial planner (or another member of our staff) by an electronic device, including mobile phones and internet video-calling software (such as Microsoft Teams) your calls may be recorded and/or monitored.

This is a regulatory requirement from the Financial Conduct Authority to protect you, your financial planner and ASAM. The content of email communications will be automatically scanned by various risk-mitigation software.

Compliance

We may also process your personal data for our compliance with our legal obligations. In this respect, we may use your personal data for the following:

- To confirm your identity and carry out background checks for anti-money laundering and 'know your client' purposes
- Any use of your personal information by such agencies will be subject to those agencies' own privacy policies and terms of use, unless they are acting only on our behalf when processing your personal information
- To fulfil our obligations under any reporting agreement entered with any tax authority or revenue service(s) from time to time as is necessary for compliance with our legal obligations
- In order to assist with investigations (including criminal investigations) carried out by the police and other competent authorities

- To meet our other compliance and regulatory obligations, including in order to comply with any requirement of regulation, regulatory rule and good practice, originating from the UK or any other applicable authority.

Data sharing

We share your data with third parties, including third-party financial service providers, ID checking agencies, credit reference agencies and other professional consultants, the courts and our regulators. We require all third parties to respect the security of your data and to treat it in accordance with the law.

Third-party service providers require access to your personal data in the course of providing their services to us. We engage third parties to provide the following services: IT systems vendors and service providers (including vendors and service providers of artificial intelligence systems/tools).

All third parties are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow third parties to use your personal data for their own purposes. We only permit them to access your personal data for specific purposes and in accordance with our instructions.

Artificial Intelligence

Where we make use of artificial intelligence tools (AI tools) we will do so in accordance with applicable law and our professional responsibilities.

We will generally use such AI tools to augment our expertise, analysis and independent advice and the output of such AI tools will be checked by qualified persons.

Where we use private AI tools in the course of providing our Services to you, we will enter into appropriate agreements with vendors and service providers of the relevant private AI tools to protect your confidentiality and personal information in line with our policies and we will use reasonable endeavours to ensure that the AI vendor or service provider will not use your personal data to train their models (other than the model which is private to us).

When you visit our website

We use cookies to track visitor use of our website and to compile statistical reports on website activity. Cookies are text files stored on your computer or mobile device to monitor user behaviour and improve user experience. We publish our Cookie Policy on our website and a copy will be provided on request.

You can set your browser not to accept cookies however, in a few cases some of our website features may not function as effectively as a result. Our website may contain links to other websites. This privacy policy only applies to our own website, so when you link to other websites you should read their own privacy policies.

When you visit our offices

If you visit our offices or premises, we may have CCTV which may record your image.

Where we store or transfer your personal data

We make provisions and take assurances from our data storage providers that all data is stored within the United Kingdom. Some may be stored 'on site' within the electronic storage facilities of Anderson Strathern Group, whilst some may be stored within 'cloud based' storage provided by our main client relationship software provider and hosted for them and us by Amazon Web Services.

Data held by AWS is physically ringfenced from other data, with robust physical and software controls in place to protect it. We, along with our CRM providers, conduct periodic due diligence on these data storage providers.

Security of your personal data

We always take appropriate technical and organisational measures to ensure that your information is secure. We train our employees who handle personal data to respect the confidentiality of customer information and the privacy of individuals. We regard breaches of your privacy very seriously and will impose appropriate penalties, including dismissal where necessary. Our Compliance Officer has the responsibility to ensure that our management of personal data is in accordance with this Privacy Notice and the applicable legislation. Once we have received your information, we will use strict procedures and security features to minimise the risk of unauthorised access.

Data Controller and Data Processor

Data Controller

The Data Controller holds responsibility for protecting your rights and privacy in relation to your personal data. Simply put, the Data Controller owns and controls the procedures and purpose of data usage. **ASAM is the data controller for your data.**

Data Processor

The Data Processor processes the data, does not own it, and is chosen by the Data Controller. The Data Controller retains all responsibility and liability for the processing of your data.

What should you do if your personal information changes?

You should tell us without delay so that we can update our records.

How long we keep your information

We will retain the personal data which is necessary to provide services to you. We will take all reasonable steps to keep your personal data up to date throughout our relationship.

We are also subject to regulatory requirements to retain your data for specified minimum periods after our relationship with you has ended. These are, generally:

- Five years for investment business
- Indefinitely for pension transfers and opt-outs
- Three years for insurance business

These are minimum periods, during which we have a legal obligation to retain your records.

We reserve the right to retain data for longer where we believe it's in our legitimate interests to do so.

Your rights under the Data Protection laws

You have certain rights in relation to the data we hold about you. These include the following rights to:

- Request a copy of the personal data we hold about you
- Request that we supply you (or a nominated third party) with a copy of the personal data that you provided to us
- Inform us of a correction to your personal data
- Exercise your right to restrict our use of your personal data
- Exercise your right to erase your personal data
- Object to the ways in which we are using your personal data.

If you would like a copy of some or all of your personal information, please email or write to us using the contact details noted below.

Withdrawal of consent

Where you have provided consent to our use of your data, you also have the unrestricted right to withdraw that consent at any time. Withdrawing your consent means that we will stop processing the data that you had previously given us consent to use. **Because of the nature of our business and the services being provided, it is likely that any withdrawal of consent will result in ASAM being unable to provide any further services to you or connected parties.**

How to contact us

Our compliance officer holds overall responsibility for data protection within ASAM. Their contact details are:

The Compliance Officer, Anderson Strathern Asset Management Limited, 58 Morrison Street, Edinburgh, EH3 8BP; Or telephone 0131 270 5270 ; enquiries@andersonstrathernam.co.uk , or through our website www.andersonstrathernam.co.uk

What if I have a complaint?

If you have a concern about any aspect of our privacy practices, in the first instance, please contact us via one of the methods set out above. If you are not satisfied with our response to your complaint, you have the right to lodge a complaint with our supervisory authority, the Information Commissioner's Office (ICO). Their details are:

<https://ico.org.uk/> - which has contact forms and online chat facilities, or telephone 0303 123 1113.

Changes to our Privacy Policy/Notice

Any changes we may make to the Privacy Notice in the future will be posted on this page and, where appropriate, notified to you by email. Please check this page frequently to see any updates or changes to this Privacy Notice.

Our details

Anderson Strathern Asset Management Limited (ASAM) is a limited company registered in Scotland under company number SC376947 and we operate from our registered address (58 Morrison Street, Edinburgh, EH3 8BP).

We are authorised and regulated by the Financial Conduct Authority (FCA), 12, Endeavour Square, Stratford, London E20 1JN www.fca.org.uk. Our firm reference number is 552925.

We are ultimately owned by Anderson Strathern LLP, a limited liability partnership registered in Scotland under number SO301485, operating from 58 Morrison Street, Edinburgh, EH3 8BP.