

EdenTree Privacy Policy

EdenTree Investment Management Limited (EdenTree) is committed to the privacy and confidentiality of information that you provide to us. This privacy notice describes our current policies and practices with regard to personal information collected and used by us.

Please take your time to read this notice carefully. When using an EdenTree website, this notice should be read alongside the [website terms and conditions](#).

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1. About us

EdenTree is part of the Ecclesiastical Group of companies and provides investment management services to a range of regulated collective investment schemes as well as a number of companies in the group, related pension schemes and third party mandates.

EdenTree is data controller of any personal data you provide to us or which is processed in connection with the services we provide to you.

To provide our fund management services, we have collected and will use personal data such as your name, date of birth and contact details and any information which is relevant to the services we are providing.

The purposes for which we use your personal data are to maintain and service your EdenTree investment account, and to notify you about changes or developments to our products and services. We will also use your personal data in order to meet regulatory requirements, such as Anti- Money Laundering obligations and to comply with our regulatory reporting requirements for tax purposes.

EdenTree have delegated administration of your investment account to Northern Trust Global Services Limited who are responsible for processing your personal information. Your personal data is also used for business purposes such as fraud prevention and business management. This may involve disclosing your personal data to other third parties such as service providers of the funds, auditors, regulatory and tax authorities and technology providers to comply with any legal obligation imposed on the funds.

If you are unsure about who the data controller of your personal information is, you can also contact us at any time by e-mailing us at compliance@edentreeim.com or by writing to Data Protection Officer, Ecclesiastical Insurance Office plc, Beaufort House, Brunswick Road, Gloucester, GL1 1JZ

2. Our processing of your personal information

2.1 Clients who we provide fund management services to

If you are a client to whom we provide fund management services to, this section will be applicable to you and will provide key information about how we use your personal information.

2.1.1 *What personal information will we collect?*

- Your name and title, address, telephone numbers and email addresses and date of birth.
- Identity documents such as passport, driving licence and national insurance number.
- Information which is related to your investment status including:
 - your bank account, payment details for income distributions and redemptions
 - your ISA account number (for transfers only);
 - tax residency information and tax identification number;
 - information obtained from checking sanctions lists;

- Information relevant to the services we provide, such as:
 - previous and current investments and funds history;
- Information contained in records of client meetings and client files.
- Information which is available publically such as internet search engines, Google, Charities Commission, Companies House, Open Charities, LinkedIn via Google (which displays name Job Title and Name of Employer), and Charity's or IFA's own website.
- Information which is available via subscription e.g. Financial Clarity and Charity Financials.

2.1.2 ***What sensitive personal information will we collect?***

In the normal course of business EdenTree does not collect or hold any sensitive personal information. The only exception would be if our anti-money laundering checks and sanctions vetting identify the following:

- Information about any criminal offences connected to anti-money laundering and market abuse you have been convicted for and any related information including about any offences or alleged offences you have committed or any court sentences which you are subject to.

2.1.3 ***How will we collect your personal information?***

Directly from you:

- On your application forms;
- Or your financial adviser may provide an Identity Verification Certificate (IVC), and
- During any communications we have, such as by telephone or email or when you make a complaint or general enquiry.
- We will also collect your personal information from:
 - Your power of attorney where applicable,
 - Third parties who provide sanctions checking services.
 - Financial crime and fraud detection agencies and other third parties who operate and maintain fraud detection registers and third parties we use to carry out credit checks.
 - Other companies in the Ecclesiastical Group.
 - Service providers we have contracted with including our subcontractors and agents, auditors, our solicitors, actuaries, IT providers and database providers, marketing mailing providers and business suppliers.
 - Any third parties in the event of a sale, merger, reorganisation, transfer or dissolution of our business.
 - Public sources such as court judgments, insolvency registers, internet search engines, social media.
 - The Financial Conduct Authority who is our regulator.

2.1.4 ***What will we use your personal information for?***

We use your information in a number of different ways, depending on your particular circumstances. For every use, we must be able to demonstrate that there is a "legal ground" to

do so. When using your "personal information", we will rely on the "legal grounds" set out below:

- **We need to use your personal information to enter into or perform the contract that you have entered into with us to buy or sell shares in the EdenTree Open Ended Investment Funds.** We will rely on this legal ground for all activities that are connected to your investment and without using your personal information we would be unable to fulfil our obligations such as providing valuations and market updates, statutory notices about any changes to the funds you have invested in, processing income distributions and responding to complaints.
- **We have a legal or regulatory obligation to use your personal information.** For example, we have legal obligations to carry out anti-money laundering checks, our regulator requires us to maintain records of all dealings with you and we have regulatory reporting obligations under tax legislation
- **We have a business need to use your personal information.** Such needs will include keeping business and accounting records, particularly records of investments, maintaining management information, statistical analysis, developing and testing our systems, analysing our business and improving the services we offer, carrying out strategic reviews of our business models and will cover all activities which are needed to carry out everyday business activities. When relying on this legal ground, we are under a duty to assess your rights and to ensure that we do not use your information unless we can demonstrate a legitimate business need.

When we use your "sensitive personal information" (such as information about any criminal offences or health disclosure made in connection with your power of attorney) we do not keep the records detailing the nature of the health of the account holder. We need to have an additional "legal ground" in order to do so. When using your "sensitive personal information", we will rely on the "legal grounds" set out below:

- **There is a substantial public interest** such as assessing preventing and detecting fraud.
- **We need to use your sensitive personal information to establish, exercise or defend legal rights.** This will be applicable where we are involved in legal proceedings, either against us or where we want to instigate them ourselves or when we are investigating a legal claim that a third party brings against you.
- **You have given your explicit consent.**

2.1.5 What are the legal grounds on which we will use your personal information?

| | What is the purpose for using your personal information ► | Legal grounds for using your personal information ► | Legal grounds for using your sensitive personal information ► |
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| | | | As with any investor the only sensitive information we would hold would be where our AML checks / Sanctions vetting identified a criminal record |

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| <p>To open your account with us Note: This would apply to direct retail business</p> | <ul style="list-style-type: none"> • It is necessary to enter into or perform your client contract | <ul style="list-style-type: none"> • We have your explicit consent. • You have made this information public knowledge. |
| <p>To provide fund management services Note: This would only apply to Segregated Mandates i.e. Professional Clients who have a full discretionary investment management agreement with us and to whom we do give advice.</p> | <ul style="list-style-type: none"> • It is necessary to enter into or perform your client agreement • We have a business need (to fulfil our contractual obligations) | <ul style="list-style-type: none"> • We have your explicit consent. • You have made this information public knowledge. |
| <p>To carry out fraud, and anti-money laundering checks on you</p> | <ul style="list-style-type: none"> • It is necessary to enter into or perform your client contract. • We have a legal obligation. • We have a business need (to prevent fraud and other financial crime). | <ul style="list-style-type: none"> • It is in the substantial public interest to prevent or detect unlawful acts (where we suspect fraud and or market abuse). • We need to establish, exercise or defend legal rights. |
| <p>To comply with our legal or regulatory obligations.</p> | <ul style="list-style-type: none"> • It is necessary to enter into or perform your client agreement. • We have a legal obligation. | <ul style="list-style-type: none"> • We need to establish, exercise or defend legal rights. |
| <p>To handle any complaints you may have, to process your request for information or advice and to generally communicate with you.</p> | <ul style="list-style-type: none"> • It is necessary to enter into or perform your client agreement. • We have a business need (to respond to all communications and complaints and investigate and resolve complaints). | <ul style="list-style-type: none"> • We need to establish, exercise or defend legal rights. • You have made this information public knowledge. |

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| | For business purposes such as systems development, migration of systems and live testing and diagnosing any problems with our servers and website | <ul style="list-style-type: none"> We have a business need (to run an efficient business) | <ul style="list-style-type: none"> We have your explicit consent. |
| | For business purposes such as maintaining management information, internal audits, file keeping and carrying out statistical and strategic analysis | <ul style="list-style-type: none"> We have a business need (to run an efficient business and improve our business) | <ul style="list-style-type: none"> We have your explicit consent. |
| | For financial purposes such as maintaining management information and accounting records and carrying out audits | <ul style="list-style-type: none"> We have a business need (to maintain appropriate financial records) | <ul style="list-style-type: none"> We have your explicit consent. |
| | To provide improved quality, training and security (for example, through recorded or monitored phone calls to our contact numbers, or carrying out customer satisfaction surveys). | <ul style="list-style-type: none"> We have a business need (to maintain quality control, uphold security and develop and improve the services we offer). | <ul style="list-style-type: none"> We have your explicit consent. |
| | To contact you to inform you about services we think you might be interested in. | <ul style="list-style-type: none"> We have a business need (to inform you about other services we offer). | <ul style="list-style-type: none"> We have your explicit consent. |
| | To notify you about important changes or developments to the features and operation of any services we provide you with | <ul style="list-style-type: none"> We have a business need (to keep you updated about any changes or developments which may affect our service offerings). | <ul style="list-style-type: none"> We have your explicit consent. |

2.1.6 ***Who will we share your personal information with?***

We do not share or distribute your personal information other than to the following third parties and only under the limited circumstances we have set out above:

- Northern Trust Global Services Limited (to whom we have delegated administration of your investment account to) and their affiliates, agents and subcontractors.
- Third party business parties and advisers who assist us with providing investment services and provide services in relation to the management of your investments or facilitate the arrangement of products we recommend including investment advisers, distributors of our funds and financial service providers offering banking, trust and custodial products and services, product providers, portfolio and fund managers and insurers where you are buying protection products.
- Third parties who provide sanctions checking services.
- Financial crime and fraud detection agencies and other third parties who operate and maintain fraud detection registers and third parties we use to carry out credit checks.
- Other companies in the Ecclesiastical Group.
- Service providers we have contracted with including our subcontractors and agents, auditors, our solicitors, actuaries, IT providers and database providers, marketing mailing providers, website providers, technology providers and business suppliers.
- Any third parties in the event of a sale, merger, reorganisation, transfer or dissolution of our business.
- The Financial Conduct Authority who is our regulator.
- Law enforcement agencies such as the police, HMRC and taxation authorities.
- Our own insurers and companies who we have appointed to assist with arranging our insurance.

2.2 **Individuals who have the power of attorneys for clients who we provide financial and investment advice to**

Individuals who have power of attorneys for clients who are invested in our funds.

If you have been granted power of attorney over a client who holds an investment in our funds, this section will be applicable to you and will provide key information about how we use your personal information.

2.2.1 ***What personal information will we collect?***

- Your name and title, address, telephone numbers and email addresses.
- Identity documents such as passport and driving licence.
- Information about your position as power of attorney and your relationship to our client.
- Information which is available publically such as internet search engines. Google, Charities Commission, Companies House, Open Charities, LinkedIn via Google (which displays name Job Title and Name of Employer).

2.2.2 ***What sensitive personal information will we collect?***

In the normal course of business EdenTree does not collect or hold any sensitive personal information. The only exception would be if our anti-money laundering checks and sanctions vetting identify the following:

- Information about any criminal offences you have been convicted for and any related information including about any offences or alleged offences you have committed or any court sentences which you are subject to.

2.2.3 ***How will we collect your personal information?***

Directly from you:

- on the power of attorney document;
- when you speak with your independent financial advisers; and
- during any communications we have, such as by telephone or email.

We will also collect your personal information from:

- Our client to whom you are power of attorney.
- Public sources such as court judgments, insolvency registers, internet search engines, social media.

2.2.4 ***What will we use your personal information for?***

We use your information in a number of different ways, depending on your particular circumstances. For every use, we must be able to demonstrate that there is a "legal ground" to do so. When using your "personal information", we will rely on the "legal grounds" set out below:

- **We need to use your personal information to enter into or perform the client contract over which you are exercising power of attorney.** We will rely on this legal ground for all activities that are connected to the client's agreement and without using your personal information we would be unable to fulfil our obligations.
- **We have a legal or regulatory obligation to use your personal information.** For example, our regulator requires us to maintain records of all dealings with you.
- **We have a business need to use your personal information.** Such needs will include keeping business and accounting records, particularly records of powers of attorney, maintaining management information, statistical analysis, developing and testing our systems, analysing our business and improving the services we offer, carrying out strategic reviews of our business models and will cover all activities which are needed to carry out everyday business activities. When relying on this legal ground, we are under a duty to assess your rights and to ensure that we do not use your information unless we can demonstrate a legitimate business need.

- When we use your “sensitive personal information” (such as information about any criminal offences, we need to have an additional “legal ground”. When using your “sensitive personal information”, we will rely on the “legal grounds” set out below:
- **There is a substantial public interest** such as assessing preventing and detecting fraud.
- **We need to use your sensitive personal information to establish, exercise or defend legal rights.** This will be applicable where we are involved in legal proceedings, either against us or where we want to instigate them ourselves or when we are investigating a legal claim that a third party brings against you.
- **You have given your explicit consent.**

2.2.5 What are the legal grounds on which we will use your personal information?

| What is the purpose for using your personal information ► | Legal grounds for using your personal information ► | Legal grounds for using your sensitive personal information ► |
|---|---|---|
| To verify your position as attorney | <ul style="list-style-type: none"> • We have a business need (to verify the identify of any third parties purporting to act on behalf of our clients) | As with any investor the only sensitive information we would hold would be where our AML checks / Sanctions vetting identified a criminal record. |
| To facilitate your position as our client's attorney and to administer products and services to the client for whom you act as attorney | <ul style="list-style-type: none"> • It is necessary to enter into or perform your client contract. • We have a business need (to ensure that we fulfil our contractual obligations). | |
| To comply with our legal or regulatory obligations. | <ul style="list-style-type: none"> • It is necessary to enter into or perform your client agreement. • We have a legal obligation. | |
| To handle any complaints you may have, to process your request for information or advice and to generally | <ul style="list-style-type: none"> • We have a business need (to respond to all communications and complaints and | |

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| | communicate with you. | investigate and resolve complaints). | |
| | For business purposes such as systems development, migration of systems and live testing and diagnosing any problems with our servers and website | <ul style="list-style-type: none"> We have a business need (to run an efficient business) | |
| | For business purposes such as maintaining management information, internal audits, file keeping and carrying out statistical and strategic analysis | <ul style="list-style-type: none"> We have a business need (to run an efficient business and improve our business) | |
| | For financial purposes such as maintaining management information and accounting records and carrying out audits | <ul style="list-style-type: none"> We have a business need (to maintain appropriate financial records) | |
| | To provide improved quality, training and security (for example, through recorded or monitored phone calls to our contact numbers). | <ul style="list-style-type: none"> We have a business need (to maintain quality control and uphold security) | |
| | To notify you about important changes or developments to the features and operation of services we provide to our client for whom you act as attorney | <ul style="list-style-type: none"> We have a business need (to keep you (as attorney for our client) updated about any changes or developments which may affect our client's products and service offerings). | |

2.2.6 **Who will we share your personal information with?**

We do not share or distribute your personal information other than to the following third parties and only under the limited circumstances we have set out above:

- Northern Trust Global Services Limited (to whom we have delegated administration of the client's investment account to) and their affiliates, agents and subcontractors.
- Third party business parties and advisers who assist us with providing investment services and provide services in relation to the management of investments or facilitate the arrangement of products we recommend including investment advisers, distributors of our funds and financial service providers offering banking, trust and custodial products and services, product providers, portfolio and fund managers and insurers.
- Other companies in the Ecclesiastical Group.
- Service providers we have contracted with including our subcontractors and agents, auditors, our solicitors, actuaries, IT providers and database providers, marketing mailing providers, website providers and business suppliers.
- Any third parties in the event of a sale, merger, reorganisation, transfer or dissolution of our business.
- The Financial Conduct Authority who is our regulator.
- Law enforcement agencies such as the police, HMRC and taxation authorities.

2.3 Users of the EdenTree website

If you use or access the EdenTree website, this section will be applicable to you and will provide key information about how we use your personal information.

2.3.1 **What personal information will we collect?**

- Name, contact details, postcode and IP address
- Information obtained through our use of cookies. You can find more information about this in our cookies policy [here](#)

Please note that if you use the 'Contact Us Form' <http://edentreeim.com/contact-us> or Communications Preference Form <http://edentreeim.com/gdpr-consent> on our website, this section is relevant will apply to you.

2.3.2 **How will we collect your personal information?**

We collect your information directly from our website and where you have submitted any information on our website.

2.3.3 **What will we use your personal information for?**

We use your information in a number of different ways, depending on your particular circumstances. For every use, we must be able to demonstrate that there is a "legal ground" to do so. When using your "personal information", we will rely on the "legal grounds" set out below:

- **We have a business need to use your personal information**, such as developing and testing our systems, analysing our business and improving the services we offer, diagnosing any problems with our website and assessing usage of our website. When relying on this legal ground, we are under a duty to assess your rights and to ensure that we do not use your information unless we can demonstrate a legitimate business need.

2.3.4 *What are the legal grounds on which we will use your personal information?*

| What is the purpose for using your personal information | Legal grounds for using your personal information | Legal grounds for using your sensitive personal information |
|---|--|--|
| To respond to any enquiries you make. | We have a business need (to respond to all enquiries made on our website). | - |
| To provide marketing materials about products and services we think you might be interested in. | We have a business need (to inform you about other services we offer). | - |

2.3.5 *Who will we share your personal information with?*

We do not share or distribute your personal information other than to the following third parties and only under the limited circumstances we have set out above:

- Other companies in the Ecclesiastical Group.
- Service providers we have contracted with relating to the website such as our subcontractors and agents and website providers.

3. What marketing activities do we carry out?

We may use your personal information to provide you with information about our services or contact you about our business and funds information from time to time, where you have provided your consent for us to do so.

We are committed to only sending you marketing communications that you have clearly expressed an interest in receiving. If you no longer wish to receive information from us and want to be removed from our standard mailing list you can "unsubscribe" by clicking the link that appears in all emails or by post using the details set out in section 8. Please note that by stopping these communications you may not hear about a new product or services that may be of interest to you.

Please note that, even if you opt out of receiving marketing messages, we may still send you communications which are relevant to the type of services we provide you with.

4. How long do we keep personal information for?

We will only keep your personal information for as long as reasonably necessary to fulfil the purposes set out in section 3 above and to comply with our legal and regulatory obligations.

At EdenTree we will retain your personal data for a period of 5 years after the closure of your investment account.

If you would like further information about how long we will keep your personal information for, please contact us using the details set out in section 10.

5. What is our approach to sending your personal information overseas?

There may be some instances where your personal information is transferred to countries outside of the European Economic Area ("EEA") such as when we transfer information to our other companies in the Ecclesiastical group or to third party suppliers who are based outside the EEA or when third parties who act on our behalf transfer your personal information to countries outside the EEA.

Where such a transfer takes place, we will take the appropriate safeguarding measures to ensure that your personal information is adequately protected. We will do so in a number of ways including:

- entering into data transfer contracts and using specific contractual provisions that has been approved by European data protection authorities otherwise known as the "standard contractual clauses";
- transferring personal data only to companies in the United States who are certified under the "Privacy Shield". The Privacy Shield is a scheme whereby companies certify that they provide an adequate level of data protection. You can find out more about the Privacy Shield [here](#);
- we will only transfer personal data to companies in non-EEA countries who have been deemed by European data protection authorities to have adequate levels of data protection for the protection of personal information. You can find out more about this [here](#).

We are also entitled under European data protection laws to transfer your personal information to countries outside the EEA in the following circumstances:

- it is necessary for the performance of the contract we have with you
- it is necessary to protect your vital interests i.e. it is a life or death situation.

Depending on our relationship and your particular circumstances, we might transfer personal information anywhere in the world. A summary of our regular data transfers outside the EEA is set out below:

| Country of transfer | Reason for the transfer | Method we use to protect your information |
|---------------------|-------------------------|---|
| India | There are data servers | We have entered into |

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| | established in India which store your information where you are a financial advice and investment client | standard contractual clauses with the company hosting the data servers in India. |
| United States of America | Northern Trust Global Services Limited is based in the US | Northern Trust Global Services Limited is Privacy Shield Registered |

If you would like further information regarding our data transfers and the steps we take to safeguard your personal information, please contact us using the details set out in section 10.

6. How do we protect your information?

We implement and maintain appropriate technical and organisational measures to ensure the ongoing confidentiality, integrity, availability and resilience of processing systems and services.

We implement and maintain appropriate technical and organisational measures to ensure the ongoing confidentiality, integrity, availability and resilience of processing systems and services.

These include but are not limited to the following key activities:

- We adopt a framework of information security controls operating at different levels within the company to restrict access and safeguard systems, in accordance with a 'defence in depth' methodology (which is the coordinated use of multiple security controls to protect the integrity of the information and assets in the company's IT network);
- We have an established, documented information security and data protection policy framework which is regularly reviewed to consider changes in technology, regulations and threats;
- We maintain encryption technologies to encrypt data stored on portable computers and portable media, and ensure security when data is transferred;
- We maintain awareness and education on information security and data protection in all areas of our business;

We conduct risk based due diligence on our suppliers;

- We operate a programme of testing the effectiveness of our information security measures.

7. Your rights

You have several data protection rights which entitle you to request information about your personal information, to dictate what we do with it or to stop us using it in certain ways.

If you wish to exercise the rights set out below, please contact us at any time using the details set out in section 8. There will not normally be a charge for this.

We respect your rights in relation to personal information we hold about you, however we cannot always comply with your requests, for example:

- we may not be able to delete your information if we are required by law to keep it for a longer period of time; or
- if we delete your information we would not have the necessary information we need to administer your investment account.

However, we will always inform you why we cannot comply with your request.

The right to access your personal information

You can request a copy of the personal information we hold about you and certain details of how we use it.

Your personal information will normally be provided to you in writing unless you request otherwise or where you have made a request by electronic means such as email, we will provide such information in electronic form where possible.

The right to withdraw your consent

Where we rely on consent as the legal ground to use your personal information, you are entitled to withdraw that original consent.

Please note that for certain uses of your personal information, we need your consent in order to administer your investment. If you exercise this right and withdraw your consent, we may need to redeem your holding. We will inform you of these consequences when you withdraw your consent.

The right to rectification

We make reasonable efforts to keep your personal information where necessary up to date, complete and accurate. We encourage you to ensure that your personal information is accurate so please regularly let us know if you believe that the information we hold about you may be inaccurate or not complete. We will correct and amend any such personal information and notify any third party recipients of necessary changes.

The right to restriction of processing

Subject to the circumstances in which you exercise this right, you can request that we stop using your personal information, such as where you believe that we no longer need to use your personal information.

The right to data portability

Subject to the circumstances in which you exercise this right, you can request that we port across personal information you have provided to us to a third party in a commonly used and machine-readable format.

The right to erasure

You can request that we delete your personal information. For example, where we no longer need your personal information for the original purpose we collected it for or where you have exercised your right to withdrawn consent.

Whilst we will assess every request, this request is subject to legal and regulatory requirements that we are required to comply with.

The right to object to direct marketing

You can request that we stop sending you marketing messages at any time by clicking on the "unsubscribe" button in any emails that we send to you or by contacting us using the details set out in section 8.

Please note that even if you exercise this right because you do not want to receive marketing messages, we may still send you service related communications where necessary.

The right to make a complaint with the ICO

Where you believe that we have breached data protection laws when using your personal information, you can complain to the Information Commissioner's Office (ICO). For more information visit the ICO's website at <https://ico.org.uk/>. Please note that exercising this right and lodging a complaint will not affect any other legal rights or remedies that you have.

8. Contacting us

If you would like further information about the ways we use your personal information, further clarity on how we use your personal information or anything referred to in this notice, please contact our Data Protection Officer at compliance@edentreeim.com or by writing to Data Protection Officer, Ecclesiastical Insurance Office plc, Beaufort House, Brunswick Road, Gloucester, GL1 1JZ.

9. Updates to this notice

We are continually improving our methods of communication and alongside with changes in the law and the changing nature of technology, our data practices and how we use your data will change from time to time. If and when our data practices change, we will notify you and we will provide you with the most up-to-date notice. You can view it by checking our website www.edentreeim.com.

This notice was last updated on 24 May 2018.

