



# Aberdeen Standard Capital Privacy Policy

# Aberdeen Standard Capital Privacy Policy

Aberdeen Standard Capital Limited ("Aberdeen Standard Capital") is committed to protecting your personal information.

Our Privacy Policy contains important information about what personal details we collect, what we do with that information, who we may share it with and why, and your choices and rights when it comes to the personal information you have given us.

We may need to make changes to our Privacy Policy so please check our website for updates from time to time. If there are important changes to how we handle your personal information we may contact you to let you know.

Our Cookie Policy forms part of our Privacy Policy. When you browse our websites we use cookies to store information about how you use these websites in order to improve the quality of service provided to you. To understand what type of cookies we use and how these work when you use our websites you can access our Cookie Policy here – [www.aberdeenstandard.com/cookie-policy](http://www.aberdeenstandard.com/cookie-policy).

This version of our Privacy Policy was last updated 21 January 2019.

## Who we are

Aberdeen Standard Capital Limited is the new name for Standard Life Wealth Limited, a wholly owned subsidiary of Standard Life Investments (Holdings) Limited. Aberdeen Private Wealth Management Limited operates under the name Aberdeen Standard Capital and is a subsidiary of Aberdeen Asset Management PLC. Both are part of Standard Life Aberdeen PLC.

Aberdeen Standard Capital is a discretionary fund manager focused on providing investment management and advisory services for our clients.

This Privacy Policy also applies to subsidiaries of Aberdeen Standard Capital (these are the companies which manage the services and products we offer to our clients), incorporating: Aberdeen Standard Capital International Limited and Aberdeen Standard Capital (CI) Limited.

## How to contact us

If you have any questions about our Privacy Policy or the information we collect or use about you, please contact us:

FAO Data Protection Officer  
Aberdeen Standard Capital  
c/o Standard Life Aberdeen PLC,  
1 George Street,  
Edinburgh.  
EH2 2LL

Or Email:  
[SLA\\_DPOffice@aberdeenstandard.com](mailto:SLA_DPOffice@aberdeenstandard.com)

## Information we collect and use

Information about you that we collect and use includes:

- Information about who you are e.g. your name, date of birth and contact details.
- Information connected to your service or product with us e.g. your bank account details.
- Information about your contact with us e.g. meetings, phone calls, emails / letters.
- Information that is automatically collected e.g. via cookies when you visit one of our websites.
- Information if you visit one of our offices e.g. visual images collected via closed circuit television (CCTV).
- Information classified as 'special category' personal information e.g. relating to your health.
- Information you may provide us about other people e.g. joint applicants or beneficiaries, for services or products you have with us.
- Children are not able to buy services or products from us. However, on instruction from a parent or guardian, a child can be named as a beneficiary on some trusts and funds. In these cases, we collect relevant personal information to identify the child (such as their name and age).

Where we collect and use special category personal information, this information will only be collected and used where it is needed to provide the appropriate service or product to you or to comply with our legal obligations, and where we have also obtained your explicit consent to process such information.

## Where we collect your information

We may collect your personal information from you, from a variety of sources, including:

- An application form for a service or product.
- Telephone conversations with us.
- Emails or letters you send to us.
- Meetings with one of our Client Portfolio or Business Development Managers.
- Registering for one of our events.
- Participating in research surveys to help us understand you better and improve our services and products.
- Our online services such as client portals, websites, social media and mobile device applications.

If you have a financial adviser the information we collect and use may have been provided by them on your behalf.

We may also collect personal information about you from places such as business directories and other commercially or publicly available sources e.g. to check or improve the information we hold (like your address).

## Why we collect and use your information

We take your privacy seriously and we will only ever collect and use information which is personal to you where it is necessary, fair and lawful to do so. We will collect and use your information only if we are able to satisfy one of the lawful processing conditions set out in the data protection laws. This will be the case where:

- It is necessary to provide services or products you have requested e.g. to provide you with an investment portfolio tailored to your specific needs, advice or to invest in one of our funds, we will require some personal information which may include your name, address, date of birth, and bank account details and may also collect some sensitive information.
- It is necessary for us to meet our legal or regulatory obligations e.g. to send you statements, tell you about changes to Terms and Conditions, or for the detection and prevention of fraud.
- It is in the legitimate interests of Aberdeen Standard Capital i.e.
  - to deliver appropriate information and guidance so you are aware of further options available to you to support better outcomes from your services or products with Aberdeen Standard Capital;
  - to process your information to better understand you and your needs so we can send you more relevant communications about our services and products you have with us and to develop new services and products.

Where the processing is in our legitimate interests, we will always conduct an assessment to ensure that this use of your personal information is not excessive or unnecessary or otherwise more intrusive than it needs to be.

- You have given us your consent to use your information. For example, if we are collecting and using your special category personal information or to send you information which we believe may be of interest and benefit to you. This could be about products and services offered by other parts of Standard Life Aberdeen plc and / or selected third parties we have chosen to work with.

You can withdraw your consent at any time by contacting your Client Portfolio Manager or Business Development Manager.

Or Emailing:  
SLA\_DPOoffice@aberdeenstandard.com

If you do not wish us to collect and use your personal information in these ways, it may mean that we will be unable to provide you with our services or products.

- We sometimes use systems to make automated decisions based on personal information we have - or are allowed to collect and use from others - about you. These automated decisions can affect the services or features we offer you now or in the future. We use automated decisions in the following ways:

Tailoring our services to enable the best outcome for you e.g. placing you in groups with similar clients to make decisions about the services or products we may offer you to help meet your needs.

When designing and enhancing our online services to help meet your requirements for ongoing support.

If you do not wish us to collect and use your personal information in these ways, it may mean that we will be unable to provide you with our services or products.

## Who we share your information with and why

We may share your information internally and with third parties for the reasons outlined in 'Why we collect and use your information'.

We will share your information with:

- Other parts of Standard Life Aberdeen plc and other companies who support us in the provision of services to you or products you have.
- Credit and identity check agencies for ID verification and credit reference checks.
- Your adviser, trustee, business associate, professional advisor where this is required as part of the service or product you have agreed with us.
- Companies we have chosen to support us in the delivery of the services or products we offer to you and other clients. For example, custodians, administrators, investment platforms, research, consultancy or technology companies who help us improve our service to you.
- Companies who can help us in our contact with you, for example an internet service provider.
- Our regulators include the Financial Conduct Authority and the Information Commissioner's Office in the UK and the Jersey Financial Services Commission and the Office of the Information Commissioner in Jersey.
- Law enforcement and other appointed agencies who support us (or where they request the information) in the prevention and detection of crime.
- HM Revenue & Customs in the UK, the States of Jersey Taxes Office in Jersey, and the Inland Revenue Service in the United States for the purposes of tax reporting where necessary.

Whenever we share your personal information, we will do so in line with our obligations to keep your information safe and secure.

## Where your information is processed

The majority of your information is processed in the UK and European Economic Area (EEA).

However, some of your information may be processed by us or the third parties we work with in countries deemed adequate by the EU Commission, such as Jersey, or outside of the EEA, including countries such as the United States.

Where your information is being processed outside of the EEA, we take additional steps to ensure that your information is protected to at least an equivalent level as would be applied by UK / EEA data privacy laws e.g. we will put in place appropriate legal agreements with our third party suppliers.

## How we protect your information

We take information and system security very seriously and we strive to comply with our obligations at all times. Any personal information and special category personal information which is collected, recorded or used in any way, whether on paper, online or any other media, will have appropriate safeguards applied in line with our data protection obligations.

Your information is protected by controls designed to minimise loss or damage through accident, negligence or deliberate actions. Our employees protect special category or confidential information when storing or transmitting information electronically and they must also undertake annual training on the application and content of our Privacy Policy.

Our security controls are aligned to industry standards and good practice providing a control environment that effectively manages risks to the confidentiality, integrity and availability of your information.

## How long we keep your information

To provide your service or product, and meet our legal and regulatory obligations, we keep your personal information and copies of records we create (e.g. calls with us) while you are a client of ours.

Even when you no longer have a relationship with us, we are required to keep information for different legal and regulatory reasons. The length of time will vary and we regularly review our retention periods to make sure they comply with all laws and regulations.

## Your rights

You have a number of rights under data protection laws which you may exercise in certain circumstances.

These are:

### Right to be informed

You have a right to receive clear and easy to understand information on what personal information we hold, why we hold it and with whom we share it – these details are contained in our Privacy Policy and Privacy Notices.

## Right of access

You have the right of access to your personal information. If you wish to receive a copy of the personal information we hold on you, you may make a data subject access request.

If you would like to submit a data subject access request, please contact your Client Portfolio Manager or Business Development Manager.

Or Email:

SLA\_DPOffice@aberdeenstandard.com

## Right to request that your personal information be rectified

If your personal information is inaccurate or incomplete, you can request that it is corrected.

## Right to request erasure

You can ask for your information to be deleted or removed if there is not a compelling reason for Aberdeen Standard Capital to continue to have it.

## Right to restrict processing

You can ask that we block or suppress the processing of your personal information for certain reasons. This means that we are still permitted to keep your information – but only to ensure we don't use it in the future for those reasons you have restricted.

## Right to data portability

You can ask for a copy of your personal information for your own purposes to use across different services. In certain circumstances, you may move, copy or transfer the personal information we hold to another company in a safe and secure way. For example, if you were moving your assets to another discretionary fund manager or ISA manager.

## Right to object

You can object to Aberdeen Standard Capital processing your personal information where: it is based on our legitimate interests; for direct marketing; and if we were using it for research and statistics.

If you would like to exercise any of these rights please contact your Client Portfolio Manager or Business Development Manager.

Or Email:

SLA\_DPOffice@aberdeenstandard.com

## How to make a complaint

We will always strive to collect, use and safeguard your personal information in line with data protection laws. If you do not believe we have handled your information as set out in our Privacy Policy, please let us know immediately and we will do our utmost to make things right.

You can raise this with our Data Protection Officer by Emailing:

[SLA\\_DPOffice@aberdeenstandard.com](mailto:SLA_DPOffice@aberdeenstandard.com)

or

[customer\\_relations@standardlife.com](mailto:customer_relations@standardlife.com)

While we hope that we can resolve any complaints for you, you do have the option of complaining (whether or not you have exhausted our complaints procedure) to our Supervisory Authority. We have provided their details below:

UK - Information Commissioner's Office (ICO)

Wycliffe House,

Water Lane,

Wilmslow,

Cheshire.

SK9 5AF

<https://ico.org.uk>

Jersey - Office of the Information Commissioner (OIC)

One Liberty Place,

Liberty Wharf,

La Route De La Liberation,

St Helier,

Jersey.

JE2 3NY

<https://oicjersey.org>









Aberdeen Standard Capital Limited, registered in Scotland (SC317950) at 1 George Street, Edinburgh EH2 2LL.  
Aberdeen Standard Capital is authorised and regulated by the Financial Conduct Authority.

Aberdeen Standard Capital International Limited is registered in Jersey (38918) at IFC 1, The Esplanade, St Helier, Jersey JE1 4BP.  
Aberdeen Standard Capital International Limited is regulated by the Jersey Financial Services Commission under the Financial Services (Jersey) Law 1998 (as amended) for the conduct of investment business and fund services business.

Aberdeen Standard Capital (CI) Limited is registered in Jersey (number 5769) at IFC 1, The Esplanade, St Helier, Jersey JE1 4BP.  
Aberdeen Standard Capital (CI) Limited is regulated by the Jersey Financial Services Commission.

Aberdeen Private Wealth Management Limited is a private company incorporated in Jersey (Registration no.41628) and is regulated by the Jersey Financial Services Commission under the requirements of the Financial Services (Jersey) Law 1998.  
Private Client business operates under the Financial Services (Jersey) Law 1998, Investment Business, (Jersey) Codes of Practice.  
Aberdeen Private Wealth Management Limited is a wholly owned subsidiary of Aberdeen Asset Management PLC.  
[aberdeenstandardcapital.com](http://aberdeenstandardcapital.com)

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