

# Crystal Asset

## Privacy Policy

### 1.0 Introduction

This is the privacy policy for <https://crystalasset.com> (the “**Site**”). The Site is operated by Crystal Asset (“**we**”, “**us**” and “**our**”). We are an investment firm located at 13 Primrose St, London, EC2A 2AG, UK. For the purposes of the European Economic Area data protection law, (the “**Data Protection Law**”), we are the data controller. You can contact us at: [info@crystalasset.com](mailto:info@crystalasset.com).

We are committed to protecting your personal information and privacy on-line. We appreciate that you do not want your personal information distributed indiscriminately and here we explain how we collect information, what we do with it and what rights you have.

Information that identifies or can be used to identify a living individual is known as “personal data.” All organisations processing personal data must do so fairly, lawfully and in accordance with applicable data protection laws, including the Data Protection Law. This includes the obligation for us to tell you how we will use your personal data. We treat all of our legal obligations seriously and take all steps necessary to ensure compliance when storing and processing your personal data.

By using or engaging our Site and accepting our services you acknowledge that you have read and understood this privacy policy

We reserve the right to change this privacy policy from time to time by changing it on the Site and any substantive changes will be notified to you by e-mail. This privacy policy was last updated on 23 January 2021.

### 2.0 Personal Data We May Collect from You

We may collect and process the following personal data about you received directly from you or from your interactions with us for compliance with a legal obligation:

- contact details (such as your name, email address, postal address and telephone number) that you provide by completing forms on the Site, including if you register as a user of the Site, subscribe to any service, upload or submit any material via the Site, request any information;

- your date of birth, country of residence, employment status and source of investment funds.
- your financial circumstances (e.g. assets, liabilities, income and expenditure);
- in connection with an account sign-in facility, your log-in and password details;
- details of any transactions made by you through the Site;
- communications you send to us, for example to report a problem or to submit queries, concerns or comments regarding the Site or its content;
- information from surveys that we may, from time to time, run on the Site for research purposes, if you choose to respond to or participate in them;
- technical information that may include the Internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform; and/or
- information about your visit to the Site, which may include the full Uniform Resource Locators (URL), clickstream to, through and from our Site (including date and time), products you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), methods used to browse away from the page, and any phone number used to call our customer service number or social media handle used to connect with our customer service team.

A list of the personal data we collect from you when opening an account with us is set out at Appendix 1 to this privacy policy.

We collect your personal data from you in a number of different ways, including the following:

- if you provide it when interacting and communicating with us (for example when registering for our services);
- if you enter into an agreement for the provision of our services;
- if you enter a competition or promotion;
- if you make payments or modify your account details; and
- when you visit our Site (for example by cookies, your IP address and other browser-generated information).

We record all service calls for quality and training purposes, to enable us to deal effectively with queries and complaints and, in the case of calls where clients place transactions or investment advice is communicated, in order to comply with our regulatory obligations.

You are under no obligation to provide any such information. However, if you should choose to withhold requested information, we may not be able to provide you with certain services. This is because if you have chosen to open an account with us or commissioned investment advice, it is a statutory requirement for us to obtain, and a contractual requirement for you to provide, certain information so that we can verify your identity in order to meet our obligations under the Money Laundering Regulations 2007 and other applicable legislation for the purposes of crime prevention. You are obliged to provide this information in order for us to provide the service and, if you fail to provide it, we will be unable to provide the service in compliance with our legal obligations.

We do not collect, nor do we process "special categories of personal data". Special category data is personal data which is more sensitive and would include: race; ethnic origin; politics; religion; trade union membership; genetics; biometrics; health; sex life or sexual orientation for example.

### **3.0 Cookies and Other Technologies**

When you interact with the Site, we try to make that experience simple and meaningful. Our cookies distinguish you from other users of our Site. This helps us provide you with a good experience when you browse our Site and allows us to improve our Site.

### **4.0 How Do We Use Your Personal Data?**

We use your personal data as is necessary and required to do so by law, or on a contractual basis and in our legitimate interest (where such interests are not overridden by your interests or fundamental rights and freedoms) to the extent it is necessary for the proper operation of the Site, our services, our systems, to protect us/our clients, or for the enforcement of our Terms and Conditions.

We may also use your personal data collected from you for the following purposes:

- processing applications made by you, managing your accounts, providing our services, contacting you and servicing our relationship with you;
- administration and accounting, billing and auditing and other legal purposes;

- to carry out checks on you, such as identification verification checks and anti-money laundering checks, for the purposes of meeting our obligations under the Money Laundering Regulations 2007 and any other applicable legislation, for the purposes of crime prevention;
- security and payment verification;
- dealing with any queries, complaints or problems reported by you;
- audit the downloading of data from the Site;
- enabling you to participate in our promotions and competitions;
- enabling you to participate in the interactive features of the Site and ensuring content from our Site is presented in the most effective manner for you and your computer or device;
- notifying you about changes to our service and/or the terms on which the services are provided;
- generating statistics on our users, such as the popularity of certain of our services and about the “traffic” visiting our websites. Before doing this your personal data is anonymised and you are not personally identifiable; and

We may also use your personal data to provide you with information about our goods or services we feel may interest you only if you have given your consent to receiving marketing material from us at the point we collected your information.

In order to monitor and analyse our business we, or a third party acting for us, may use information in your client and account records to assess client satisfaction and for market research. If you do not wish to be contacted to participate in client satisfaction or marketing surveys, you can opt out by asking us and our third parties to stop contacting you by writing to us or by opting out by SMS or email as specified in the relevant communication. This request will not affect the running of your existing account or the services you request from us, in respect of which we will still process your personal data.

Unless stated otherwise in this privacy policy, the legal basis for our use of your personal data will be that this information is processed for one or more of the legitimate interests described above and/or as is necessary for compliance with any legal obligation.

## 5.0 Our Promotional Updates and Communications

Where permitted in our legitimate interest where required by law (as applicable), we will use your personal information for marketing analysis.

With your prior consent we may also provide you with promotional update communications by email, secure message, phone or SMS about our products/services.

If you are an existing client, we will only contact you by e-mail, secure message via the website or SMS with information about goods and services similar to those which were the subject of a previous agreement with you and if you have not opted out of receiving such communications.

If you are a new client we will contact you by email, secure message via the website and SMS only if you have consented to this.

If you do not want us to use your data in this way, you can record your preference when you initially provide us with your details, contact us in writing at any time to object to marketing or opt out to receiving marketing by SMS or email as specified in the relevant marketing communication at any time. Opting out from such communications will not prevent us from communicating with you as necessary to manage your account.

## 6.0 Who Is Your Personal Data Shared with?

You acknowledge that we may disclose your personal data to:

- entities within our group of companies, which means our subsidiaries, our ultimate holding company and its subsidiaries, who support our processing of personal data under this policy. If any of these parties are using your information for direct marketing purposes, we will only transfer the information to them for that purpose with your prior consent;
- third parties which we use to carry out the checks that we need to carry out on you, such as identification verification and anti-money laundering;
- the custodian for the purpose of managing your accounts and providing our services;
- the SIPP provider for the purpose of managing your accounts and providing our services;
- other selected third party service providers that may be located in or outside the European Economic Area (EEA). These may include:
- Organisations who process your personal data on our behalf and in accordance with our instructions and the Data Protection Law. This includes in supporting the services we offer

through the site in particular those providing website and data hosting services, providing fulfilment services, distributing any communications we send, supporting or updating marketing lists, facilitating feedback on our services and providing IT support services from time to time. These organisations (which may include third party suppliers, agents, subcontractors and/or other companies in our group) will only use your information to the extent necessary to perform their support functions.

- We may disclose your personal information to any of our affiliates, or to our agents or contractors who assist us in providing the services we offer through the Site, processing transactions, fulfilling requests for information, receiving and sending communications, updating marketing lists, analysing data, providing IT and other support services or in other tasks, from time to time. Our agents and contractors will only use your information to the extent necessary to perform their functions.
- Analytics and search engine providers that assist us in the improvement and optimisation of our site and subject to the cookie section of this policy (this will not identify you as an individual).
- Payment processing providers who provide secure payment processing services. Note your payment card details are not shared with us by the provider.

Third parties to whom your personal data is disclosed to may only use it for the purposes set out in this privacy policy.

A non-exhaustive list of third party service providers to whom we disclose your personal data to is included in Appendix 2 to this privacy policy.

If we transfer your data to a service provider outside of the EEA, we ensure that appropriate controls are in place to protect your data in accordance with applicable data protection laws, such as:

- the European Commission has made an official adequacy decision that the recipient country is a 'safe' country for the receipt of personal data; or
- we have entered into a form of contract with the service provider which has been approved by the European Commission as providing adequate protection for personal data, or if the service provider is in the US, it has self-certified to the EU/US Privacy Shield Framework.

For a copy of the details of the transfers of, or access to, personal data outside of the EEA and the safeguards that we have in place when transferring, or allowing access to, your personal data outside

of the European Economic Area, (and for a copy of the safeguards, where applicable) please contact us via email at [info@crystalasset.com](mailto:info@crystalasset.com).

We may disclose aggregate statistics about visitors to the Site and clients in order to describe our services to prospective partners, advertisers, sponsors and other reputable third parties and for other lawful purposes, but these statistics will include no personally identifiable information.

In the event that we undergo re-organisation or are sold to a third party, you agree that any personal data we hold about you may be disclosed under appropriate confidentiality terms to our advisers and any prospective purchasers' advisers, and will be transferred to that re-organised entity or the new owners.

We may disclose your personal information if required to do so by law or if we believe that such action is necessary to prevent fraud or cyber-crime or to protect the Site or the rights, property or personal safety of any person.

## **7.0 Automated Decisions**

As part of our account-opening process we will carry out automated checks using your personal data, such as your name, postal address, date of birth, telephone numbers and employment status. These checks include identification verification checks and financial crime checks and involve our obtaining information from identity verification agencies and any records held by financial crime prevention agencies, the Electoral Register and providers of utility services.

We need to carry out these checks in order to meet our legal obligations under the Money Laundering Regulations 2007 and any other applicable legislation.

We will also carry out suitability checks regarding your choice of investment account. Parameters will include your financial circumstances and investment time horizon. These checks may indicate that an account is unsuitable for you. If our automated processes indicate that a portfolio may be unsuitable then you will be contacted by a member of the Client Service or Advisory team to discuss your choices and allow you to provide further information which may result in the decision changing.

## **8.0 External Links**

The Site may, from time to time, contain links to external sites. We are not responsible for the privacy policies or the content of such sites.

## 9.0 Security and Safeguarding Your Personal Data

We place great importance on the security of all personal information associated with our users and clients. We have security measures in place to attempt to protect against the loss, misuse and alteration of personal information under our control. For example, our security and privacy policies are periodically reviewed and enhanced as necessary and only authorised personnel have access to personal information. Whilst we cannot ensure or guarantee that loss, misuse or alteration of information will never occur; we use all reasonable efforts to prevent it.

You should bear in mind that submission of information over the internet is never entirely secure. We cannot guarantee the security of information you submit via the Site whilst it is in transit over the internet and any such submission is at your own risk.

You can also help to protect your personal data, by following the guidelines below:

- choose a password that you will be able to remember but that would be hard for someone to guess. It is required to contain both upper and lower case letters, a number and a symbol. We recommend that you change it regularly and if you need to write it down, always keep it in a safe place;
- make sure that no-one can see the details you are entering when you log-in;
- if other people have access to your computer, remember to close your browser each time you logoff and end your session and, if possible, clear any history of the websites you have visited and that your browser may have saved or "cached"; and
- never disclose your account details to anyone.

## 10.0 Data Retention and Storage of your Personal Data

We will only keep your personal data for as long as we need to in order to fulfil the relevant purpose(s) it was collected for, as set out above in this privacy policy and for as long as we are required to keep it by law. We retain copies of our client contracts in order to enable us to deal with any legal issues along with the information provided to us for identification verification checks and anti-money laundering checks (as required by law) for 6 years after termination or expiry of our contract with you. Site usage data will be retained for a period of 3 years in order that we can monitor the performance of the Site.



Your personal information which we collect is sent to and stored on secure servers currently located in the Republic of Ireland and/or the Netherlands. Such storage is necessary in order to process the information. Personal information submitted may be transferred by us to our other offices and/or to the third parties mentioned in the circumstances described above (see Information Sharing), which may be situated outside the European Economic Area (EEA) and may be processed by staff operating outside the EEA. The countries concerned may not have similar data protection laws to the EEA. Where we transfer your personal information we will take all reasonable steps to ensure that your privacy rights continue to be protected. By using the Site, you agree to this storing, processing and/or transfer.

## 11.0 Your rights

You have the following rights (unless exemptions apply), which can be exercised by contacting our Data Protection Officer at [info@crystalasset.com](mailto:info@crystalasset.com) at any time.

The right:

- to ask us not to process your personal data for marketing purposes;
- to access personal information held about you and to obtain a copy of it;
- to prevent any processing of a record of personal data that is causing or is likely to cause unwarranted and substantial damage or distress to you or another individual;
- to obtain the rectification or completion of records of personal data which are inaccurate or incomplete;
- to restrict or object to the processing of your personal data and to request its erasure. We will not be able to erase personal data where we have a legal obligation to retain such data for example the results of identity verification checks;
- in certain circumstances, to receive your personal data, which you have provided to us, in a structured, commonly-used and machine readable format and the right to transmit that data to another data controller without hindrance, or to have that personal data transmitted to another data controller, where technically feasible; and
- to lodge a complaint about the way in which your personal data is being shared with a supervisory authority.

Where we rely on your consent to use your personal data, you have the right to withdraw that consent at any time by contacting us at [info@crystalasset.com](mailto:info@crystalasset.com).

If your request or concern is not satisfactorily resolved by us, you may approach your local data protection authority. The Information Commissioner is the supervisory authority in the UK and can provide further information about your rights and our obligations in relation to your personal data, as well as deal with any complaints that you have about our processing of your personal data.

## 12.0 Contacting Us

Please submit any questions, concerns or comments you have about this privacy policy or any requests concerning your personal data by email to [info@crystalasset.com](mailto:info@crystalasset.com), between the hours of 9am to 5pm, Monday to Friday.

### Appendix 1

The following is a list of personal data which is collected for the purposes of opening an account with us:

Name

Address

Phone number

Email address

Date of Birth

Country of residence

Employment status

All of the above are legally required.

This list is correct as of 23 January 2021 and may be subject to change.

## Appendix 2

The following is a list of processors of personal information which we have engaged to provide services to clients:

Custodian – SEI International (Europe) Limited

Identity checks and Anti Money Laundering – Experian and Equifax

The above list is correct as of 23 January 2021 and may be subject to change.