

Raymond James – GDPR Privacy Notice

Dated: 25 May 2018

Contents of this Privacy Notice:

Table of Contents

1. Who we are and how to contact us2

2. What kind of personal information about you do we process?2

3. How do we collect your personal information?3

4. For which purposes will we use your personal information?.....4

6. How and when can you withdraw your consent?5

7. Will we share your personal information with third parties?5

8. Is your personal information transferred outside of the UK or the EEA?6

9. What should you do if your personal information changes?7

10. Do we do any monitoring which involves the processing of your personal information?.....7

11. How long is your personal information retained by us?7

12. What are your rights under data protection laws?8

13. Data anonymisation and use of aggregated information.....8

14. Future changes to this privacy notice.....8

15. Our Contact Information8

ANNEX 1 – List of Raymond James European entities9

1. Who we are and how to contact us

Raymond James European entities (“**Raymond James**”) are data controllers of your personal information. Personal information is information about you or from which we can identify you. This privacy notice describes how we deal with your personal information. We are the data controller of this information under relevant data protection laws because in the context of our business relationship with you we decide how and why it is processed in the ways explained in this privacy notice.

It is important for you to know that Raymond James European entities comprises of the entities listed in Annex 1. As such, the way Raymond James European entities process your personal information is captured within this privacy notice. Where we use terms such as **we**, **us** and **our** in this notice, we mean Raymond James European entities as defined in Annex 1.

Raymond James also has registered tied agents under its name which are established in European Union. Each tied agent may obtain your personal information on our behalf and will apply this privacy policy to your personal information in the same way as we do. Each tied agent will need to know that personal information in order to process it for us. Each tied agent is subject to strict contractual confidentiality and data transfer obligations. We may discipline and/or terminate individuals and contracting parties who maliciously acquire information, without being entitled to its access.

If you have queries about this privacy notice or wish to exercise any of the rights mentioned in it, please contact us on the contact details at the bottom of this Privacy Notice.

This privacy notice may be updated from time to time. You will be able to review the most up to date version of this privacy notice online by clicking [here](#). Where necessary, we will also send you an updated copy of the privacy notice.

2. What kind of personal information about you do we process?

We have set out below a description of the types of personal information about you which we will process when you or your organisation become a client of ours, or during the course of our corresponding with you (both when you or your organisation are our client, or where you or your organization have expressed interest in becoming a client, but have not yet become one).

Below is a description of the different types of personal information that we will collect and process about you in different circumstances.

- 2.1 Personal information that we generally process regardless of how you contact us, or for what reason, includes:
 - 2.1.1 Contact information, such as your title, full name, job title, your email address, your business address and your contact details including for instance work and mobile telephone numbers (if you have provided them) and address history (usually only for current clients, or for new clients for identification, anti-money laundering, anti-fraud and credit reference agency checks); and/or
 - 2.1.2 Payment data, such as data necessary for processing payments and fraud prevention, including credit/debit card numbers, security code numbers and other related billing information
 - 2.1.3 Further business information necessarily processed in a project or client contractual relationship with Raymond James or voluntarily provided by you, such as instructions given, payments made, requests and projects; and
 - 2.1.4 If you or your organisation submit an application to become a client, in the process of becoming a client or are already a client of ours, in addition to the above personal information, we will collect the following from you;

- 2.1.5 Information collected from publicly available resources, integrity data bases and credit agencies;
- 2.1.6 proof of identification in the form of copies of your passport, driving licence or other identity documents like utilities bills;
- 2.1.7 personal information and contact information which you provide in correspondence with us, whether by email, written letter, or telephone call or through our online enquiry system or attendance notes of meetings or calls; and/or
- 2.1.8 information relating to use of our service;
- 2.1.9 If legally required for compliance purposes, information about relevant and significant litigation or other legal proceedings against you or a third party related to you and interaction with you which may be relevant for antitrust purposes;
- 2.1.10 Other personal data regarding your preferences where it is relevant to legal services that we provide; and/or
- 2.1.11 Details of your visits to our premises.

From time to time, it may include personal data about your membership of a professional or trade association or union, health personal data, details of dietary preferences when relevant to events to which we invite you and details of any criminal record you may have.

3. **How do we collect your personal information?**

We may collect personal information about you in a number of circumstances, including

- 3.1. When you or your organisation seek financial services from us;
- 3.2. When you or your organisation browse, make an enquiry or otherwise interact with us in our branches or on our website;
- 3.3. When you attend a Raymond James event; and
- 3.4. When you or your organisation offer to provide or provide services to us.

In some circumstances, we collect personal information about you from a third party source. For example, we may collect personal information from your organisation, other organisations with whom you have dealings, government agencies, a credit reporting agency, an information or service provider or from a publicly available record.

As a general principle, you will provide us with your personal information entirely voluntarily; there are generally no detrimental effects for you if you choose not to consent or to provide personal information. However, in certain circumstances it will be necessary for you to provide us with your personal information, to enable us to manage our operations, to provide services to you or your organisation, or to comply with our statutory obligations.

However, please note that where you do not supply any of the personal information we request, this may mean that we are unable to maintain or provide services or products to you or your organisation.

Where you choose not to provide us voluntary personal information this may also reduce the quality or type of service we are able to provide (for example, without providing your e-mail address, we may only be able to contact you by postal mail so our correspondence with you will be slower).

4. For which purposes will we use your personal information?

- 4.1. We will use your personal information in connection with the management of your relationship with you and for the following purposes ("Permitted Purposes"):
 - 4.1.1. to provide our financial services or solutions as instructed or requested by you or your organisation;
 - 4.1.2. to manage and administer your or your organisation's business relationship with Raymond James, including processing payments, accounting, auditing, billing and collection, customer support services;
 - 4.1.3. to comply with our legal obligations (such as record keeping obligations), compliance screening or recording obligations (e.g. under antitrust laws, export laws, trade sanction and embargo laws, for anti-money laundering, financial and credit check and fraud and crime prevention and detection purposes), which may include automated checks of your contact data or other information you provide about your identity against applicable sanctioned-party lists and contacting you to confirm your identity in case of a potential match or recording interaction with you which may be relevant for compliance purposes;
 - 4.1.4. to analyse and improve our services and communications to you;
 - 4.1.5. to protect the security of and access to our premises, IT and communication systems, online platforms, websites and other systems, preventing and detecting security threats, fraud or other criminal or malicious activities;
 - 4.1.6. for insurance purposes;
 - 4.1.7. to monitor and assess compliance with our policies and standards;
 - 4.1.8. to identify persons authorised to trade on behalf of our clients, customers, suppliers and/or service providers;
 - 4.1.9. to comply with our legal and regulatory obligations and requests anywhere in the world, including reporting to and/or being audited by national and international regulatory bodies;
 - 4.1.10. to comply with court orders and exercises and/or defend our legal rights;
 - 4.1.11. to communicate with you through the channels you have approved to keep you up to date on the latest market developments, announcements, and other information about Raymond James services, products and technologies (including client briefings, newsletters and other information) as well as Raymond James events and projects; and
 - 4.1.12. to send you customer surveys, marketing campaigns, market analysis, sweepstakes, contests or other promotional activities or events.

5. What are the legal grounds for our processing of your personal information (including when we share it with others)?

- 5.1. Data protection laws require us to explain what legal grounds justify our processing of your personal information (this includes sharing it with other organisations). For some Permitted Processing, more than one legal ground will be relevant. We mainly use the personal information we hold about you:

- 5.1.1. because processing is necessary for the performance of a client instruction or other contract with you or your organisation;
 - 5.1.2. to comply with our legal obligations (e.g. to keep pension records or records for tax purposes); or
 - 5.1.3. because processing is necessary for purposes of our legitimate interest or those of any third party recipients that receive your personal data, provided that such interests are not overridden by your interests or fundamental rights and freedoms.
- 5.2. In addition, the processing may be based on your consent where you have expressly given that to us. We will rely on your consent where you have opted-in to receiving marketing communications (and have not subsequently opted-out or requested to be removed from any marketing list – which you can do by contacting us as set out below) and/or when you volunteer information to us in correspondence or during meetings where a attendance note is taken. There may be other instances where we use consent to process your personal information and special category personal information. If we do, we will provide you with further information about the purposes of the processing at the time we ask for your consent.
- 5.3. Each of the above mentioned categories or reasons for processing your personal information is commonly known as a ‘legal basis’ which justifies the processing of your personal information in accordance with data protection law and for the Permitted Purposes.

6. **How and when can you withdraw your consent?**

You have the right to withdraw your consent at any time by contacting us using the contact information provided below. If you do withdraw your consent, this will mean that we will stop similar future processing. However, the withdrawal of your consent will not invalidate any processing which we previously undertook before you withdrew your consent.

Please note, where we rely on another lawful reason to process your personal information, withdrawing your consent will not affect that processing (such as where the processing is necessary for our performing our contract with you, or where we must process your personal information to comply with law, as described above) and we will continue to process your personal information for those purposes notwithstanding the fact that you have withdrawn your consent for one of the above listed purposes.

7. **Will we share your personal information with third parties?**

Yes, we will share your personal information with third parties. There are times when we are either mandated by law to disclose your personal information to third parties (such as tax authorities), additionally, we contract third parties to help us run our business and where we do so, we will also disclose your personal information to those third parties. Where we contract third parties to assist us to provide our services, we will always do so subject to appropriate contracts and safeguards being put in place.

We will never sell, rent or trade your personal information to an outside company.

We will share your personal information with others who have a duty to keep it secure and confidential, and where we have a lawful reason for doing so, as explained in **section 5** above.

The categories of organisations that we will share your information with are:

- our service providers, agents (including tied agents) and sub-contractors who assist us to provide our services and process information on our behalf, such as where we engage with a third party to run the day to day business of our Branches, IT and communications service providers, customer records management providers (who assist us in managing customer records); financial modelling services which are used to provide you with financial illustrations and comparison service providers who help us determine what products may be available for you depending on your specific circumstances;

- product and financial service providers from whom we acquire products, whether on your behalf or in your own name with our assistance, who will require specific information;
- professional advisors, such as lawyers, accountants, actuaries;
- an organisation who we may transfer our rights and duties to in the event of a corporate transaction (e.g. if we restructure or sell our business); and/or
- a Raymond James group company, such as our ultimate parent company Raymond James Financial Inc.

We can also share your information with UK and overseas regulators and authorities in connection with their duties (such as crime prevention), and/or in connection with our compliance with legal and/or regulatory obligations.

Unless a third party is our service provider (such as our communications service provider), we cannot control all use of your personal information by some third parties who we may be required to share your information with (such as regulators), as they will process your personal information for their own specific purposes. As such, where your personal information has been shared with another data controller entity, you will have rights over how that third party handles your personal information and you can and should contact those parties directly if you want to exercise your rights in relation to those third party's uses of your personal information.

8. **Is your personal information transferred outside of the UK or the EEA?**

- 8.1 We are based in the UK but sometimes your personal information will be transferred outside the UK or the European Economic Area (EEA). If it is processed within Europe or other parts of the EEA then your personal information is protected by European data protection standards.
- 8.2 Some countries outside the EEA do have adequate protection for personal information under laws that apply to us, this only happens where the European Commission has confirmed this and made a decision in this regard. However, where your personal information is transferred outside of the EEA to a country which does not have the same level of protection as afforded within Europe, we will make sure that suitable safeguards are in place before we transfer your personal information to such a country.
- 8.3 The safeguards that we will use to protect your personal information in relation to international transfers include contractual obligations imposed on the recipients of your personal information. Those obligations require the recipient to protect your personal information to the standard required in the EEA. Safeguards also include requiring the recipient to meet one of the European Commission approved mechanisms to transfer personal information outside of the EEA which include:
- 8.3.1 sending the information to EU Commission approved countries, that is countries which the EU Commission has deemed to have data privacy laws which are of a standard which complies with the EU data protection laws (this is the case for the Channel Islands mentioned above);
 - 8.3.2 the use of EU Commission approved model clause contracts;
 - 8.3.3 for transfers to the United States – certification under Privacy Shield;
 - 8.3.4 having internal binding corporate rules which set an internal standard for the handling of personal information which meets EU data protection law requirements.

More measures have been introduced from 25 May 2018, and we will keep those under review always with the intention that your personal information will be appropriately secured and treated in the event that it is transferred outside of the EEA.

8.4 As part of our business operations, we will, where it is lawful and necessary to do so, share with and/or transfer some of your personal information to other Raymond James group companies (as discussed above). Raymond James has entered into an intra-group data sharing and transfer agreement with its other various companies [and tied agents?] to ensure the secure handling of your personal data. This data sharing and transfer agreement includes provisions to protect your personal data where the other Raymond James company is based outside of the EEA and will meet one or more of the obligations for the secure transfer of your personal information as set out here.

9. **What should you do if your personal information changes?**

We will take steps to ensure that we keep your personal information accurate and up to date. However, we are reliant on you to assist us in doing this. As such, you should tell us without delay if any of your personal information changes, so that we can update our records.

10. **Do we do any monitoring which involves the processing of your personal information?**

By monitoring, we mean any listening to, recording of, viewing of, intercepting of, or taking and keeping records (as the case may be) of calls, email, text messages, social media messages, in person face to face meetings and other communications.

We may monitor where permitted by law and we will do this where the law requires it. In particular, where we are required by the Financial Conduct Authority's regulatory regime to record certain telephone lines or in person meetings (as relevant) we will do so. However, it is standard practice at Raymond James that we will record all external calls for training, compliance, security and evidentiary purposes even where these calls fall outside of our regulatory obligations. This practice is noted within and is part of our Terms of Business.

Some of our monitoring may be to comply with regulatory rules, self-regulatory practices or procedures relevant to our business, to prevent or detect crime, in the interests of protecting the security of our communications systems and procedures, to have a record of what we have discussed with you and actions agreed with you, to protect you and to provide security for you (such as in relation to fraud risks on your account) and for quality control and staff training purposes.

In addition to monitoring calls, some of our branches use CCTV cameras for health, safety and security purposes. As such, if you attend at one of our branches, you may have your image recorded on CCTV. We may also deploy other access control mechanisms at some of our offices or branches, such as a visitor's log, which you may be required to sign on entry which will also capture our personal information for safety and security purposes.

11. **How long is your personal information retained by us?**

We will only retain your personal information for as long as necessary to meet the reason your personal information was collected for. We need to keep your information long enough to make sure that we can provide our services to you, to comply with and/or satisfy all legal obligations including our obligations to keep records and to protect our interests. Your personal information will be deleted when it is no longer reasonably required for the Permitted Purposes or you withdraw your consent (and we are not legally required or otherwise permitted to continue storing such data). We may keep your personal information where required for Raymond James to assert or defend against legal claims until the end of the relevant retention period or until the claims in question have been settled.

If we anonymise your personal information so that it can no longer be associated with you, it will no longer be considered personal information, and we can use it without further notice to you.

If you would like further information about our data retention practices, contact us on the details set out in this Privacy Notice.

12. **What are your rights under data protection laws?**

Here is a list of the rights that all individuals have under data protection laws. They do not apply in all circumstances. If you wish to exercise any of them we will explain at that time if they are engaged or not.

- 12.1 The right **to be informed** about our processing of your personal information;
- 12.2 The right to have your **personal information corrected if it is inaccurate** and to have **incomplete personal information completed**;
- 12.3 The right to **object to processing** of your personal information;
- 12.4 The right to **restrict processing** of your personal information;
- 12.5 The right to have your **personal information erased** (the “*right to be forgotten*”);
- 12.6 The right to **request access** to your personal information and to obtain information about how we process it;
- 12.7 The right to **move, copy or transfer** a copy of the personal information you have provided us with (“*data portability*”);
- 12.8 Rights in relation to **automated decision making** which has a **legal effect or otherwise significantly affects you**.

To exercise your rights as set out above, please write to us at the details set out in this Privacy Notice.

There is no fee for making these requests. However, if your request is excessive or unfounded, we can charge a reasonable fee or refuse to comply with it.

You have the right to complain to the Information Commissioner’s Office which enforces data protection laws: <https://ico.org.uk/> .

13. **Data anonymisation and use of aggregated information**

Your personal information may be converted into statistical or aggregated data which cannot be used to re-identify you. It will then be used to produce statistical research and reports. This aggregated data will be shared and used in all the ways described in this privacy notice, and it may also be used in other ways not described here. However, as the information will be aggregated anonymous data, it will no longer constitute your personal information and can therefore be used more widely than if you could still be identified from it.

14. **Future changes to this privacy notice**

We reserve the right to update this privacy notice at any time. You will always be able to review the current privacy notice by clicking [here](#) or by requesting a copy from your Raymond James contact.

15. **Our Contact Information**

Please contact us if you have any questions about this privacy notice or information we hold about you.

Email us: ECMcompliance-international@Raymondjames.com

Write to us: Raymond James Privacy, at the address detailed in Annex 1 to the appropriate entity

ANNEX 1 – List of Raymond James European entitiesRaymond James entities:

- Raymond James Financial International Limited ('RJFI') company number 03127076, registered in England with a principal place of business at Broadwalk House, 5 Appold Street, London, EC2A 2AG. RJFI is authorised and regulated by the FCA to conduct investment business.
- Raymond James Euro Equities ('RJEE'), company registered in France with a principal place of business at 40, Rue La Boétie, 75008 Paris, France. RJEE is a French Investment Service Provider authorised by the Autorité de Contrôle Prudentiel et de Résolution ('ACPR') and regulated by the ACPR and the Autorité des Marchés Financiers ('AMF').
- Raymond James Corporate Finance GmbH ('RJCF'), company registered in Germany with a principal place of business at Theresienstrasse 1, 80333 Munich, Germany.

List of RJFI Tied agents:

- Raymond James Deutschland GmbH & Co. KG ("Raymond James Deutschland") with a principal place of business in Germany at Moerser Str. 100, 40667 Meerbusch. Raymond James Deutschland has been approved as a tied agent to RJFI to conduct investment business.
- Raymond James Benelux SA ("Raymond James Belgium") with a principal place of business in Belgium at Avenue Emile Duray 38, B – 1050 Brussels. Raymond James Belgium has been approved as a tied agent to RJFI to conduct investment business.
- Raymond James CEE Sp z o.o. ('Raymond James Poland') with a principal place of business in Poland ul. Wspólna 62, 00-684 Warszawa, Poland. Raymond James Poland has been approved as a tied agent to RJFI to conduct investment business.
- Eqqitay AG ('Raymond James Vaduz') with a principal place of business in Liechtenstein at Bildgass 42, 9494 Schaan. Raymond James Vaduz has been approved as a tied agent to RJFI to conduct investment business.
- Raymond James SE SA ('Raymond James Chiasso') with a principal place of business in Switzerland at Via Livio 14, 6830 Chiasso, Switzerland. Raymond James Chiasso has been approved by FINMA as a representative office of RJFI.