

Privacy Policy of St James Safe Deposit Company. Updated 15 May 2018

St James's Safe Deposit Company Limited and St James's Safe Deposit (Yorkshire) Limited ("We") are committed to protecting and respecting your privacy. This policy sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us.

The General Data Protection Regulation ((EU) 2016/679) (GDPR) (effective on 25 May 2018) gives data subjects (living individuals in respect of whom personal data is processed) enhanced rights and protections in relation to their personal data. We are committed to safeguarding the privacy of the users of our services. Therefore, we have updated our Privacy Policy so we are completely clear as to what personal data we collect, why we collect that personal data and how we handle it. We, St James's Safe Deposit Company Limited (where you use our services in Manchester) and St James Safe Deposit (Yorkshire) Limited (where you use our services in Leeds, both of 77 Oxford Street, Manchester, M1 6EG are the Data Controller of personal data (as that term is defined in data protection legislation) we collect about you, so we can provide services to you.

Please read this privacy policy carefully. By visiting our website (www.stjames-safedeposit.com) you are accepting and consenting to the practices described in this policy.

1. What information do we collect from you?

We may process the following data about you:

1.1 Information you give us.

What personal data might you supply to us?	How and why we process your personal data:
Account information: Information about you which relates to your account with us. This information may include your name, address, telephone number, email address, identification information (as required by our regulators, which may also include identification documents such as your passport and utility bills), your date of birth, payment information, visit information, other relevant client information and details relating to any individuals whose information you supply to us as being individuals who can access the safe deposit box services we supply on your behalf.	We will process this data to maintain your account with us, to provide our services to you, to communicate with you and to back up our database. The reason we process this data is to ensure the proper administration of your account and our business (our legitimate interest) and, where you have entered into a contract with us, for the purposes of fulfilling our contract with you
Website Information: Information you provide when you make an enquiry using our website and when you report a problem with our site. The information you give us may include your name, address, e-mail address and phone number.	We will process this data so we can deal with your registration, or other communications or applications, or to address your query or concern. The reason we process this data is to ensure the proper administration of your registration and our business.
Communication Data: If you communicate with us, we may process the information contained in your communication. This information may include your name and contact information, the content of your communication and any metadata our website generates where you communicate with us using the contact form available on our website.	We will process that information so we can correspond with you and keep records of such correspondence. The reason we are processing this data is to ensure the proper administration of our business (our legitimate interest).
Notification Data: Where you have subscribed to receive our email notifications and/or newsletters, we will process your data so that we can send such email	The legal basis for us processing this data is that you have consented to such processing

<p>notifications and/or newsletters to you. If you prefer not to receive such communications please contact us using the details contained in paragraph 9 below to unsubscribe.</p>	
<p>Regulatory Data: We may process your data if we need to do so in order to comply with our legal and/or regulatory obligations, so that we can protect the vital interests of you or another natural person. This includes obtaining information from our customers to verify their identity.</p>	<p>The reason we will process such data is to ensure the proper administration of our business (our legitimate interest) and to protect the vital interests of you or another natural person.</p>

1.2 Information we collect about you.

With regard to each of your visits to our website we will automatically collect the following information:

- (a) technical information, including 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. We will obtain this data through our analytics tracking system. We process this data so we can monitor and analyse how our website is used so we can improve our website and our services.;
- (b) information about your visit, including the full Uniform Resource Locators (URL), clickstream to, through and from our website (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. We process this data so we can monitor and analyse how our website is used so we can improve our website and our services

1.3 Information we receive from other sources.

We are working closely with third parties (including, for example, business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers, credit reference agencies). We may receive personal data about you from these organisations. Those organisations will have their own privacy policies detailing how they process personal data.

2. Cookies

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site. For detailed information on the cookies we use and the purposes for which we use them see our Cookie policy on our website.

3. When will we disclose your personal data to others?

- 3.1 We may need to share your personal information with members of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries. These terms are defined in section 1159 of the UK Companies Act 2006. We will only share such personal information where this is necessary for the purposes set out in this policy.
- 3.2 We may need to share your personal information with certain selected third parties including:
 - (a) our business partners, suppliers and sub-contractors for the purpose of performing any contract we have with you or them. In particular, we use third party companies to process your personal data in order to carry out the identification checks we are required by law to undertake and to provide IT support services; and
 - (b) analytics and search engine providers that assist us in the improvement and optimisation of our website.
- 3.3 We will also disclose your personal information to third parties in the following circumstances:

- (a) If we sell or buy any business or assets, in which case we may need to disclose certain personal data to the prospective seller or buyer of such business or assets.
- (b) If all or most of our assets are acquired by a third party, in which case personal data held by us about our customers will be one of the transferred assets.
- (c) If we are under a legal duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce any legal agreement we have with you; or to protect our rights or property, or the safety of us, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

4. Where do we store your personal data?

We will always try to ensure that your personal data is processed within the European Economic Area. In some circumstances this will not be possible. In circumstances where it is necessary for us to transfer your personal data outside the European Economic Area, we will only transfer such personal data to third parties where we have carried out due diligence on such third parties to ensure they will protect your personal data using similar standards and safeguards as we have. We will also have contractual provisions in place with such third parties to ensure your personal data is protected. Such contractual provisions will be based on the standard contractual clauses approved by the European Commission for the transfer of data outside the EEA or such other appropriate standards as are required from time to time by the European Commission or the UK Government. You consent to the transfer of your personal data outside of the EEA, as long as we comply with these requirements.

Where we have given you (or where you have chosen) a password which enables you to access our services, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, and we will maintain appropriate technical and organisation measures to protect your personal data, we cannot guarantee the security of your data transmitted to our website; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

5. Storage and deletion of personal data

- (a) Any personal data that we process will be deleted from our systems once we have completed the purpose for which we were processing the personal data. In some cases, the purpose for which we are processing your personal data will last for a considerable period (for example, if you are a long term customer of ours, we will need to store your data until our relationship with you comes to an end).
- (b) We will determine the period for which we need to retain your data, acting reasonably, and taking into consideration a number of factors such as your relationship with us, your engagement with us, and the fulfilment of contracts we have with you.
- (c) We may need to retain your personal data where this is necessary to comply with our legal or regulatory obligations, or to protect the vital interest or the vital interests of another natural person.

6. Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

7. Your rights

7.1 Under data protection laws you have the following fundamental rights:

- (a) The right to access the personal data we hold about you;
- (b) The right to have your personal data corrected if there are errors or inaccuracies in it, or your personal data is incomplete;
- (c) The right to restrict the processing we carry out in relation to your personal data;
- (d) The right to object to the processing we carry out in relation to your personal data;
- (e) The right to have the personal data we hold about you provided to you in a useable format;
- (f) The right to complain to a supervisory authority (in the UK this is the Information Commissioner's Office) about how and/or why we are processing your personal data;
- (g) The right to tell us you no longer consent to us processing your personal data. In practice you will usually agree in advance to us using your personal data for marketing purposes and if you no longer wish us to use your personal data for marketing purposes, you can opt out of receiving such marketing messages at any time. You can do this either by unsubscribing from the marketing messages we send you, notifying us in writing at datacontroller@stjames-safedeposit.com.

7.2 You can ask us to provide you with details of any personal data we hold about you. You do not have to pay us a fee to access your personal data unless we believe your access request is unfounded, repetitive or excessive. In this case we may charge you a reasonable fee to access your personal data or we may decide not to comply with your request. We will notify you if this is the case. We will require you to provide appropriate evidence of your identity before we respond to your request. Typically this identification evidence will be a photocopy of your passport or photo driving licence, which a solicitor or bank has certified as being a true copy of the original and a copy of a recent utility bill detailing your current address.

7.3 Our website may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

7.4 If you think that any of the data we hold about you is incorrect or inaccurate, you can contact us to correct such data. Please contact us at datacontroller@stjames-safedeposit.com for these purposes.

8. Changes to our privacy policy

Any changes we make to our privacy policy in the future will be posted on this page. Please check back frequently to see any updates or changes to our privacy policy.

9. Information about us

This privacy policy relates to St James's Safe Deposit Company Limited (for customers who access our services in Manchester), a company registered in England and Wales with company number 00981693 and St James's Safe Deposit (Yorkshire) Limited (for customers who access our services in Leeds), a company registered in England and Wales with company number 08514084. Our registered office address is at 77 Oxford Street, Manchester, M1 6EG. We can be contacted by post at 77 Oxford Street, Manchester, M1 6EG, , by phone 0161 236 4177 or by email datacontroller@stjames-safedeposit.com.

Our data protection officer can be contacted at datacontroller@stjames-safedeposit.com.

10. Any questions?

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to Data Protection team, St James Safe Deposit Company

77 Oxford Street

Manchester

M1 6EG

datacontroller@stjames-safedeposit.com