



MORRISON&CO

## **H.R.L. MORRISON & CO (UK) LIMITED CORPORATE PRIVACY NOTICE**

H.R.L. Morrison & Co (UK) Limited ("**Company**", "**we**" or "**us**") based at Nova North, Level 10, 11 Bressenden Place, London, SW1E 5BY is the Controller responsible for your personal information and we take our data protection and privacy responsibilities seriously. This privacy notice explains how we collect, use and share personal information in the course of our business activities, including:

- What personal information we collect and when and why we use it
- How we share personal information within Company and with regulators and other third parties
- Transferring personal information globally
- How we protect and store personal information
- Cookies
- Legal rights available to help manage your privacy
- How you can contact us for more support

### **Updates**

We may amend this privacy notice from time to time to keep it up to date with legal requirements and the way we operate our business and will place any updates on this webpage. This privacy notice was last updated on **9 November 2018**. Please regularly check these pages for the latest version of this notice. If we make fundamental changes to this privacy notice, we will seek to inform you by notice on our website or by email.

### **WHAT PERSONAL INFORMATION WE COLLECT AND WHEN AND WHY WE USE IT**

In this section you can find out more about

- when we collect personal information
- the types of personal information we collect
- how we use it
- the legal basis for using personal information

### **When we collect information**

We collect information about you:

- if you visit our website;
- if you provide it directly to us (e.g. contact Company by telephone or e-mail);
- through the ordinary course of our customer relationship (e.g. in managing transactions);

from third parties, such as your employers or your employer's advisers, when it is included in the text of a contract.

## **Types of personal information we collect and how we use it**

### *Website users*

If you visit our website, we will collect metadata that results from your usage of our website e.g. referral page, date and time of access, type of web browser, IP-address, geographic location, operating system and interface, language and version of browser software, etc. Some of this data is collected by the cookies which we place on our website. Some of this information, such as your IP address, will be used to enable you to access our website. The metadata will be used to improve the quality of our services and our website by analysing user behaviour.

### *Direct communications*

If you commence communications with us by telephone or email, we will collect any personal information included in your enquiry such as your name, address, telephone number, profession and job details to respond to you and to improve our services.

### *Through the ordinary course of customer relationship*

In order to set you or your employer up as a client, we will need to collect certain information from you, some of which may include personal information of persons relevant to your business, such as trustees, directors and beneficiaries. We use this information to assess your or your employer's suitability as a client, to comply with our legal obligations, to detect, investigate, report and seek to prevent fraud and anti-money laundering (**AML**), for example, through know-your-customer checks, AML screening and other identity checks to meet our obligations under any contract we have with you. We may conduct credit and fraud checks on your business and certain officers of your business, such as directors.

As an employee of our clients, we will collect personal information related to your role. This information will be provided to us by your employer or collected from you directly. Such personal information will include your name, job title, work email address, work telephone number, office address. This information will be included in the notice provisions of the contracts we have with your employer, and in the contact detail section of such contracts. We will use this information to send you updates and relevant notices in relation to the contract and to manage the contractual relationship we have with your employer.

## **Legal basis for using your personal information**

We will only collect, use and share your personal information where we are satisfied that we have an appropriate legal basis to do this. This will be one or more of the following:

- the processing is necessary for the **performance of a contract** to which you are a party or in order to take steps at your request prior to entering into a contract. For example, the terms of use of our website.
- the processing is necessary for compliance with **a legal obligation** to which we are subject to. For example, in order to set you or your employer up as a client, we are

obliged to carry out certain know-your-customer checks to prevent money laundering and fraudulent activities. This will involve the collection and verification of personal information of relevant members of your or your employer's organisation, such as directors, trustees and beneficiaries as relevant;

- the processing is necessary for the purposes of the **legitimate interests** pursued by us or by a third party (e.g. your employer), namely to provide our products and services to large corporate funds, except where such interests are overridden by your interests or fundamental rights and freedoms. Where relevant to website use, our legitimate interest is to use personal information in the aggregate to understand how website users use our services and the resources provided on our website and use this information to improve our services. We will also include information relating to employees of our corporate clients in the notice provisions and contact details section of contracts with your employer, our legitimate interest for use of this information is for effective customer management and service communications

Please see **Annex 1 for further details**.

The provision of your personal information is not required by a statutory or contractual obligation. Unless otherwise specified, not providing personal information will not result in legal consequences to you. If you would like to find out more about the legal basis for which we process personal information, please [contact us](#).

## **SHARING PERSONAL INFORMATION OTHERS**

In this section you can find out more about how we share personal information:

- within Company;
- government organisations and agencies, law enforcement and regulators; and
- with other third parties.

We share your personal information in the manner and for the purposes described below:

- with other companies within our group or our professional advisors providing services to us, where such disclosure is necessary to provide you or your employer with our services, to manage our contractual relationship with you or your employer or to manage our business;
- with government organisations and agencies, law enforcement or regulators to comply with all applicable laws, regulations and rules, and requests of law enforcement, regulatory and other governmental agencies including tax institutions;
- if, in the future, we sell or transfer some or all of our business or assets to a third party, we may disclose information to a potential or actual third party purchaser of our business or assets and professional advisors providing services to us.

## TRANSFERRING PERSONAL INFORMATION GLOBALLY

In this section you can find out more about:

- how we operate as a global business and transfer data internationally.
- the arrangements we have in place to protect your personal information if we transfer it overseas.

We operate on a global basis. Accordingly, your personal information may be transferred and stored in countries outside the EU, including Australia and New Zealand, which are subject to different standards of data protection.

We will take appropriate steps to ensure that transfers of personal information are in accordance with applicable law and carefully managed to protect your privacy rights and interests. We will take appropriate steps to ensure that transfers are limited to countries which are recognised as providing an adequate level of legal protection or where we can be satisfied that alternative arrangements are in place to protect your privacy rights. To this end:

- we ensure transfers within our group of companies will be covered by an agreement entered into by members of our group of companies (an intra-group agreement) which contractually obliges each member to ensure that personal information receives an adequate and consistent level of protection wherever it is transferred within our group of companies;
- where we receive requests for information from law enforcement or regulators, we carefully validate these requests before any personal information are disclosed.

You have a right to [contact us](#) for more information about the safeguards we have put in place (including a copy of relevant contractual commitments) to ensure the adequate protection of your personal information when this is transferred as mentioned above.

## HOW WE PROTECT AND STORE YOUR INFORMATION

### Security

We have implemented and maintain appropriate technical and organisational security measures, policies and procedures designed to reduce the risk of accidental destruction or loss, or the unauthorised disclosure or access to such information appropriate to the nature of the information concerned. Measures we take include:

- placing confidentiality requirements on our staff members;
- destroying or permanently anonymising personal information if it is no longer needed for the purposes for which it was collected;
- following security procedures in the storage, disclosure and destruction of your personal information to prevent unauthorised access to it; and
- using secure communication channels such as SSL ("secure sockets layer") for transmitting data that is sent to us. SSL is an industry standard encryption protocol used to protect online transaction channels.

As the security of information depends in part on the security of the computer you use to communicate with us and the security you use to protect user IDs and passwords, please take appropriate measures to protect this information.

### **Storing your personal information**

We will store your personal information for as long as is reasonably necessary for the purposes for which it was collected, as explained in this privacy notice. We will follow best practice guidance and statutory requirement to assess how long we retain your personal information for.

In specific circumstances, we may store your personal information for longer periods of time, for instance: where we are required to do so in accordance with legal, regulatory, tax, accounting requirements; so that we have an accurate record of your dealings with us in the event of any complaints or challenges; or if we reasonably believe there is a prospect of litigation relating to your personal information or dealings.

### **COOKIES**

A cookie is a small text file containing small amounts of information which is downloaded to/stored on your computer (or other internet enabled devices, such as a smartphone or tablet) when you visit a website.

Cookies may collect personal information about you. Cookies help us remember information about your visit to our website, like your country, language and other settings. Cookies allow us to understand who has seen which webpages, to determine how frequently particular pages are visited and to determine the most popular areas of our website. They can also help us to operate our website more efficiently and make your next visit easier. Cookies can allow us to do various other things, as explained further in our Cookie Policy which you can access by clicking here [Cookie Policy](#).

### **LEGAL RIGHTS AVAILABLE TO HELP MANAGE YOUR PRIVACY**

Subject to certain exemptions, and in some cases dependent upon the processing activity we are undertaking, you have certain rights in relation to your personal information. Click on the links below to learn more about each right you may have:

- to access personal information
- to rectify/erase personal information
- to restrict the processing of your personal information
- to transfer your personal information
- to object to the processing of personal information
- to object to how we use your personal information for direct marketing purposes
- to obtain a copy of personal information safeguards used for transfers outside your jurisdiction
- to lodge a complaint with your local supervisory authority

If you wish to exercise any of the above mentioned rights, we may ask you for additional information to confirm your identity and for security purposes, in particular before disclosing personal information to you. We reserve the right to charge a fee where permitted by law, for instance if your request is manifestly unfounded or excessive.

You can exercise your rights by [contacting us](#). Subject to legal and other permissible considerations, we will make every reasonable effort to honour your request promptly or inform you if we require further information in order to fulfil your request.

We may not always be able to fully address your request, for example if it would impact the duty of confidentiality we owe to others, or if we are legally entitled to deal with the request in a different way.

### **Right to access personal information**

You have a right to request that we provide you with a copy of your personal information that we hold and you have the right to be informed of: (a) the source of your personal information; (b) the purposes, legal basis and methods of processing; (c) the Controller's identity; and (d) the entities or categories of entities to whom your personal information may be transferred.

### **Right to rectify or erase personal information**

You have a right to request that we rectify inaccurate personal information. We may seek to verify the accuracy of the personal information before rectifying it.

You can also request that we erase your personal information in limited circumstances where:

- it is no longer needed for the purposes for which it was collected; or
- you have withdrawn your consent (where the data processing was based on consent); or
- following a successful right to object (see [right to object](#)); or
- it has been processed unlawfully; or
- to comply with a legal obligation to which the Company is subject.

We are not required to comply with your request to erase personal information if the processing of your personal information is necessary:

- for compliance with a legal obligation; or
- for the establishment, exercise or defence of legal claims.

### **Right to restrict the processing of your personal information**

You can ask us to restrict your personal information, but only where:

- its accuracy is contested, to allow us to verify its accuracy; or
- the processing is unlawful, but you do not want it erased; or
- it is no longer needed for the purposes for which it was collected; or

- you have exercised the right to object, and verification of overriding grounds is pending.

We can continue to use your personal information following a request for restriction, where:

- we have your consent; or
- we require the personal information to establish, exercise or defend legal claims or to protect the rights of another natural or legal person.

### **Right to transfer your personal information**

You can ask us to provide your personal information to you in a structured, commonly used, machine-readable format, or you can ask to have it transferred directly to another Controller, but in each case only where:

- the processing is based on your consent or on the performance of a contract with you; and
- the processing is carried out by automated means.

### **Right to object to the processing of your personal information**

You can object to any processing of your personal information which has our legitimate interests as its legal basis, if you believe your fundamental rights and freedoms outweigh our legitimate interests.

If you raise an objection, we have an opportunity to demonstrate that we have compelling legitimate interests which override your rights and freedoms.

### **Right to object to how we use your personal information for direct marketing purposes**

You can request that we change the manner in which we contact you for marketing purposes.

You can request that we do not transfer your personal information to unaffiliated third parties for the purposes of direct marketing or any other purposes.

### **Right to obtain a copy of personal information safeguards used for transfers outside your jurisdiction**

You can ask to obtain a copy of, or reference to, the safeguards under which your personal information is transferred outside of the European Union.

We may redact data transfer agreements to protect commercial terms.

### **Right to lodge a complaint with your local supervisory authority**

You have a right to lodge a complaint with your [local supervisory authority](#) if you have concerns about how we are processing your personal information.

We ask that you please attempt to resolve any issues with us first, although you have a right to contact your supervisory authority at any time.

## CONTACT US

The primary point of contact for all issues arising from this privacy notice is our Compliance Officer. The Compliance Officer can be contacted in the following ways:

<mailto:legal@HRLMorrison.com>

[+64 4 473 2399](tel:+6444732399)

Attention: Compliance Officer  
Nova North  
Level 10  
1 Bressenden Place  
London, S1E 5BY

If you have any questions, concerns or complaints regarding our compliance with this privacy notice, the information we hold about you or if you wish to exercise your rights, we encourage you to first contact our Compliance Officer or [us](#). We will investigate and attempt to resolve complaints and disputes and make every reasonable effort to honour your wish to exercise your rights as quickly as possible and in any event, within the timescales provided by data protection laws.

### **To contact your data protection supervisory authority**

You have a right to lodge a complaint with your local data protection supervisory authority (i.e. your place of habitual residence, place or work or place of alleged infringement), which in the UK is the [Information Commissioner's Office](#), at any time. We ask that you please attempt to resolve any issues with us before your local supervisory authority.



## ANNEX 1

What we use your information for	Further details	Legal basis for using personal information	Explanation for legitimate interests' legal basis
		<b>Performance of a Contract</b>	To take steps to manage the terms of use available on our website.
<p><b><u>Meta Data</u></b></p> <p>Some meta data, such as your IP address, will be used to enable you to access our website. The metadata will also be used to improve the quality of our services and our website by analysing user behaviour.</p>	We will collect referral page, date and time of access, type of web browser, IP-address, geographic location, operating system and interface, language and version of browser software.	<b>Legitimate interests</b>	Our legitimate interest is to use personal information in the aggregate to understand how website users use our services and the resources provided on our website and use this information to improve our services.
<p><b><u>Contract Notification Information</u></b></p> <p>We will use this information to send you updates and relevant notices in relation to the contract and to manage the contractual relationship we have with your employer.</p>	<p>As an employee of our clients, we will collect personal information related to your role.</p> <p>Such personal information will include your name, job title, work email address, work telephone number, office address.</p>	<b>Legitimate interests</b>	Our legitimate interest for use of this information is for effective customer management and service communications.
<p><b><u>Direct Communications</u></b></p> <p>We will use your personal data to respond to you and to improve our services.</p>	We will collect information such as your name, address, telephone number, profession and job details.	<b>Legitimate Interests</b>	Our legitimate interest is to use personal information to respond to you and to improve our services.
<p><b><u>Performing AML Checks</u></b></p> <p>We will use your personal data to assess your or your employer's suitability as a client, to comply with our legal obligations, to detect, investigate, report and seek to prevent fraud and anti-money laundering.</p>	Through know-your-customer checks, AML screening and other identity checks to meet our obligations under any contract we have with you. We may conduct credit and fraud checks on your or your employer's business and certain officers of your business, such as directors.	<b>Legal Obligation</b>	In order to set you or your employer up as a client, we are obliged to carry out certain know-your-customer checks to prevent money laundering and fraudulent activities.

## GLOSSARY: DEFINITIONS

<b>Defined Term</b>	<b>Definition</b>
<b>Controller</b>	is the person (ie company/legal entity/person) who (either alone or jointly or in common with other persons) determines the purposes for which and the manner in which any Personal Information are, or are to be, Processed.
<b>Personal Information</b>	any information capable of identifying a natural person, directly or indirectly, in particular by reference to an identification number or to one or more factors specific to their his or her physical, physiological, mental, economic, cultural or social identity. Data is considered personal when it enables anyone to link information to a specific person, even if the person or entity holding that data cannot make that link.
<b>Processing</b>	any operation or set of operations that is performed upon Personal Information, whether or not by automatic means, including, but not limited to collection, recording, organisation, storage, access, adaptation, alteration, retrieval, consultation, use, disclosure, dissemination, making available, alignment, combination, blocking, deleting, erasure, or destruction.