

Website Privacy and Cookies Policy



MASECO recognises the importance of protecting your personal and financial information when you visit its website and is committed to safeguarding the privacy of its website visitors. In this Website Privacy and Cookies Policy, MASECO explains how it will treat your personal information and also includes its Cookie Policy which is designed to help you understand the information collection practices on MASECO's website. By using MASECO's website, you are consenting to our use of cookies in accordance with the terms of this Policy. This Policy is dated 25 May 2018. Previous versions of this Policy are available on request. MASECO reserves the right to amend this Website Privacy Policy at any time without prior notice by updating this posting, in which case the date of this Policy will be revised. The current version of this Policy can be accessed from the link at the bottom of MASECO's website's homepage. By accessing MASECO's website following any amendments, you are accepting the amended Policy.

Website Privacy Policy

1. About MASECO

- a. MASECO LLP ("MASECO") is registered in England and Wales under registration number OC337650 and its registered office is at Burleigh House, 357 Strand, London WC2R 0HS. It is authorised and regulated by the UK's Financial Conduct Authority (Financial Services register number 489718) for the conduct of investment business and is registered as a Registered Investment Adviser by the US Securities and Exchange Commission.
- b. MASECO is registered as a data controller with the UK's Information Commissioner's Office (ICO) and its registration number is Z1481905.
- c. You can contact MASECO by writing to the firm at its registered office as stated above or by email to masecocommunications@masecopw.com or by telephone 020 7043 0455.

2. Collecting personal information

- a. MASECO may collect, store and use the following kinds of personal information:
 - i. information about your computer and about your visits to and use of MASECO's website (including your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths);

- ii. information that you provide to MASECO for the purposes of subscribing to its email notifications and/or its newsletters (including your name and email address);
 - iii. information contained in or relating to any communication that you send to MASECO through its website (including the communication content and metadata associated with the communication);
 - iv. and any other personal information you choose to send to MASECO.
- b. Before you disclose to MASECO the personal information of another person, you must obtain that person's consent both to the disclosure and the processing of that personal information in accordance with this Policy

3. Using your personal information

- a. Personal information submitted to MASECO through its website will be used for the purposes specified in this Policy or on the relevant pages of the website. The types of personal data that may be collected include your name, address, email address and telephone number.
- b. MASECO may use your personal information to:
 - i. administer its website and business;
 - ii. personalise its website for you;
 - iii. enable your use of the services available on MASECO's website;
 - iv. send you:
 - non-marketing commercial communications;
 - email notifications that you have specifically requested;
 - MASECO's newsletter (you can unsubscribe at any time if you no longer require the newsletter);
 - marketing communications relating to MASECO's business or the businesses of carefully selected third parties which MASECO thinks may be of interest to you, by post or by email or similar technology (you can inform us at any time if you no longer wish to receive such marketing communications);
 - v. provide third parties with statistical information about MASECO's website visitors (but those third parties will not be able to identify any individual user from that information);

- vi. deal with enquiries and complaints made by or about you relating to MASECO's website;
 - vii. keep MASECO's website secure and prevent fraud;
 - viii. verify compliance with the terms and conditions governing the use of MASECO's website
- c. If you submit personal information for publication on MASECO's website, it will publish and otherwise use that information in accordance with the licence you grant to MASECO.
 - d. Your privacy settings can be used to limit the publication of your information on MASECO's website and can be adjusted using privacy controls on the website.
 - e. MASECO will not, without your express consent, supply your personal information to any third party for the purposes of their or any other third party's direct marketing.
 - f. For further information on how MASECO may process your personal data (including any sensitive personal data), please refer to its **Data Protection Policy**

4. Data Transfers

- a. Information collected by MASECO by your use of its website may be stored and processed in and transferred between any of the countries in which it operates which may include jurisdictions which do not have data protection laws equivalent to those in force in the European Economic Area, such as the United States of America.
- b. Personal information that you publish on MASECO's website or submit for publication on MASECO's website may be available, via the internet, around the world. MASECO cannot prevent the use or misuse of such information by third parties.
- c. By providing your personal information via MASECO's website, you expressly agree to the transfer of your personal information as described in this section.

5. Retaining personal information

- a. Personal information which MASECO processes for any purpose or purposes will not be kept for longer than is necessary for that purpose or purposes.

- b. MASECO will retain information containing personal data to the extent it is required to do so by law; if it believes that the information may be relevant to any actual or threatened legal proceedings; and to establish, exercise or defend its legal rights (including providing information to others for the purposes of fraud prevention and reducing risk).

6. Security of personal information

- a. MASECO will take reasonable technical and organisation precautions to prevent the loss, misuse or alteration of your personal information.
- b. MASECO will store the personal data you provide on its secure (password and firewall-protected) servers.

7. Amendments

- a. MASECO may update this Policy from time to time by publishing a new version on its website.

8. Your Rights

- a. You may contact MASECO to:
 - i. request that MASECO amends, rectifies, deletes or updates the personal information it holds about you;
 - ii. where possible (e.g. in relation to marketing) amend or update your choices around processing;
 - iii. request a copy of your personal data held by MASECO.
- b. MASECO may withhold personal information that you request to the extent permitted by law.
- c. MASECO will obtain your consent in advance to its use of your personal information for marketing purposes and will provide you with an option to unsubscribe in relation to any marketing information.

9. Third party websites

Where MASECO's website contains a hyperlink to, and details of, third party websites, it has no control over such websites and is not responsible for the privacy policies and practices of such third parties.

Cookies Policy

MASECO's website uses 'cookies'. MASECO will ask you to consent to its use of cookies in accordance with the terms of this Cookies Policy when you first visit its website. If you continue to use the website then MASECO understands that you consent to its use of cookies on your machine.

1. About cookies

- a. A cookie is a small data file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server. Most website operators place cookies on the browser or hard drive of their user's computer.
- b. Cookies may either be "persistent" cookies or "session" cookies.
 - i. A persistent cookie will be stored by a web browser and will remain valid until its set expiry date unless deleted by the user before the expiry date.
 - ii. A session cookie will expire at the end of the user session when the web browser is closed.
- c. Cookies do not typically contain any information that personally identifies a user, but personal information that MASECO stores about you may be linked to the information stored in and obtained from cookies and can give you a more personalised web experience.

- d. Cookies gather information about the user's use of the website or enables the website to identify and track users as they navigate different pages on a website and identify users returning to a website. Cookies can also be used to collect information about the user which allows the website operator or a third party to create a profile of the user, their preferences and their interests for the purpose of serving the user with targeted, internet-based advertising

2. Cookies used on MASECO's website

- a. Cookies help MASECO provide customised services and information. MASECO uses cookies on its website to tell it, in general terms, how and when pages in its website are visited, what users' technology preferences are and whether the website is functioning properly. If you are using one of MASECO's password-protected sites, then the website may use cookies or other technology to help us authenticate you, store and recognise your configuration and user attributes, facilitate your navigation of the website and customise its content so that the information made available is likely to be of more interest to you.
- b. Essentially, MASECO uses different types of cookies for specific purposes:

Strictly necessary cookies	These are cookies that are required for the operation of MASECO's website. For example, cookies that enable you to log into secure areas of the website
Analytical/performance cookies	These are cookies that allow MASECO to recognise and count the number of visitors and to see how visitors move around the website when they are using it. This helps MASECO improve the way its website works. For example, by ensuring that users are finding what they are looking for easily.
Functionality cookies	These are cookies which are used to recognise you when you return to the MASCO website. This enables MASECO to personalise its content for you. For example, remember your preferences such as your choice of language
Targeting cookies	These are cookies which record your visit to MASECO's website, the pages you have visited and the links you have followed. MASECO will use this information to make its website and the advertising displayed on it more relevant to your interests. MASECO may also share this information with third parties for this purpose

a. MASECO uses persistent cookies on its website. The names of the cookies that MASECO uses on its www.masecoprivatewealth.com website, and the purpose for which they are used, are set out below:

Cookies Name	Type	Purpose of Cookie	Host
CONSENT	Google Analytics	Stores consent responses	.gstatic.com
NID	Google Analytics	Stores your Google preferences (such as preferred language)	.gstatic.com
_utma	Google Analytics	Stores site visit information (such as times and dates of visits)	.masecoprivatewealth.com
_utmb	Google Analytics	Stores date and times of current visit to the site	.masecoprivatewealth.com
_utmc	Google Analytics	Stores date and time of departure from the site	.masecoprivatewealth.com
_utmt	Google Analytics	Unique visitor reference	.masecoprivatewealth.com
_utmz	Google Analytics	Stores referral information (such as which search engine was used to find the site)	.masecoprivatewealth.com
_ga	Google Analytics	Unique visitor reference	.masecoprivatewealth.com
_gat	Google Analytics	Used to prevent denial of service (and similar) attacks	.masecoprivatewealth.com
_gid	Google Analytics	Stores references to all pages viewed on the site	.masecoprivatewealth.com
_wpfuid	WordPress	Unique reference for all forms contained on the site.	.masecoprivatewealth.com
_Wfvt_3201520395	Generic	Allows the site to remember you between pages (also known as a "session" cookie)	.masecoprivatewealth.com
Wordfence_verified-Hum	WordPress	Guards against malicious visitors to the site	.masecoprivatewealth.com

b. If you wish to know the retention period for data captured through these cookies, please refer to your wealth manager.

- c. MASECO uses Google Analytics to analyse the use of its website. This service provider generates statistical and other information about website use by means of cookies. The information generated relates to MASECO's website is used to create reports about the use of the website. The service provider's privacy policy is available at <https://www.google.com/policies/privacy>.

3. Blocking cookies

- a. Most web browsers allow you to refuse to accept cookies.
For example:
 - i. in Internet Explorer (version 10) you can block cookies using the cookie handling override settings available by clicking 'Tools', then 'Internet Options', then 'Privacy' and then 'Advanced';
 - ii. in Chrome (version 29) you can block all cookies by accessing the 'Customise and control' menu and clicking 'Settings', then 'Show advanced settings', then 'Content settings' and then selecting 'Block sites from setting any data' under the "Cookies" heading.
- b. Blocking all cookies will have a negative impact on the usability of many websites.

25 May 2018

4. Deleting cookies

- a. If you wish to remove cookies set by MASECO's website from your web browser in the future, you may delete them. The instructions for removing cookies from your computer or mobile device depends on the operating system and web browser you use. You can delete cookies already stored on your computer.
For example:
 - i. in Internet Explorer (version 10) you must manually delete cookie files (you can find instructions for doing so at <https://support.microsoft.com/kb/278835>);
 - ii. in Chrome (version 29) you can delete all cookies by accessing the 'Customise and control' menu and clicking 'Settings', then 'Show advanced settings', then 'Clear browsing data' and then selecting 'Delete cookies and other site and plug-in data' before clicking 'Clear browsing data'.
- b. Please note that withdrawing your agreement to the use of cookies on MASECO's website will impair the functionality of the website.

