



## **BROMPTON ASSET MANAGEMENT PORTAL**

### **PRIVACY NOTICE**

#### **Introduction**

This notice describes how your personal data is used and looked after in the Brompton Asset Management portal (portal). The portal has been made available to clients so they and their advisers and representatives may view the assets and investments managed on clients' behalf by Brompton Asset Management and for which Multrees Investor Services Limited (Multrees) provides safe custody. Multrees has, on Brompton's behalf, engaged Moneyinfo Limited (moneyinfo) to help provide functionality.

#### **Responsibility for your personal data**

Brompton is the "controller" of your "personal data" processed in providing the portal. Multrees is Brompton's data "processor" and moneyinfo is a data "sub-processor". Multrees and moneyinfo process your personal data on Brompton's instructions and Brompton is responsible for looking after and managing personal data. Please read Brompton's privacy notice [here](#) to understand the nature and purposes of Brompton's processing, how Brompton looks after your personal data and your rights in relation to your personal data.

#### **Privacy information specific to the portal**

When you use the portal, moneyinfo will collect technical data about your equipment, browsing actions and patterns and data about your use of the portal. It will also record information such as IP address, domain names, the web browser, operating system and device you use to access the portal, your location, the pages you visit and the date and time of each visit. This information is used to measure your use of the portal and improve its content. moneyinfo will automatically collect this personal data by using cookies and other similar tracking technologies. Please see below for further information about how moneyinfo uses cookies.

moneyinfo may also collect, use and share "aggregated data" such as statistical or demographic data for any purpose. Aggregated data are data that may be derived from your personal data but anonymised and, therefore, not considered personal data in law as the data will not directly or indirectly identify you.

#### **Removing your data**

You may instruct that your data be removed from the portal by contacting Brompton. When you instruct Brompton to delete your account from the portal, your data will be deleted from the moneyinfo servers. Aggregated data derived from your personal information may, however, be retained by moneyinfo.

#### **Cookies set by moneyinfo**

moneyinfo may store information about you in a "cookie". This is a small file sent by the web server to your computer, which moneyinfo can access when you make return visits to the portal.



This allows moneyinfo to remember your preferences. The cookies are encoded so they can only be accessed by moneyinfo. You can set your browser to refuse all or some browser cookies or to alert you when websites set or access cookies. If you disable or refuse session cookies, you will not be able to access the portal. The cookies used by moneyinfo are set out in the table below:

Category	Name	Purpose
Session	NativityAuth	This enables the portal to function. It remembers the user who logged in to the system. It is removed when the browser is closed.
Session	RequestVerificationToken	This enables the portal to function. It protects the user against cross-site request forgery. It is removed when the browser is closed.
Persistent	ai_user	Created during the first visit to the portal, this determines whether the user has visited the portal within the previous year. It expires one year after being created.
Session	ai.session	This links the user's navigations within the portal to help developers understand what actions the user took and in what order. It is created on the first visit to the portal, expiring 30 minutes after being created.

Your consent will be sought before the creation of any cookies not strictly necessary.

### **Changes to this notice**

Changes to this notice will be posted via the portal. Such changes shall be effective from the next time you use the portal.

### **Contact**

If you have queries about how Brompton uses your personal data, please contact us on [bamops@bromptonam.com](mailto:bamops@bromptonam.com).