

# **Privacy notice for website visitors**

**Last updated November 2021** 



#### Please read these terms carefully

The protection of your personal data is very important to us. We process your data in accordance with the EU General Data Protection Regulation ('GDPR'), and the Data Protection Act. In this Data Privacy Notice we inform you of the most important aspects pertaining to the processing of your data, which we collect when you use our website, social media profiles, mobile apps or any other web applications. This Data Privacy Notice also explains some of the measures used to ensure the confidentiality of the data transmitted and to protect your privacy.

This Data Privacy Notice applies to the website of LGT Group ('Website'). We reserve the right to amend this Data Privacy Notice without prior notice of any changes (e.g. legal circumstances, product or services offering, data processing policy). Any amendments become applicable from the time they are published on our Website. Some pages may contain links to other providers ('Third-party Providers') within and outside LGT Group, to which this Data Privacy Notice does not apply. The conditions and Data Privacy Notices of the respective Third-party Providers apply for the linked websites and content. We assume no liability in connection with linked third-party websites.

#### 1. Contact with us

If you establish contact with us by e-mail or by using the contact form provided on our Website, your data are used for processing or post-processing of the inquiry, to establish contact and for technical administration purpose.

We collect and use personal data on our Website in order to improve the information, products and services provided, to further align our business processes with the needs of clients and visitors to the Website ('Visitors') and to ensure efficient access to information and online banking applications.

#### 2. Web server logs

When you use our Website, access data are stored (e.g. log files, IP address, date and time of access, name of the requested file, access status, page from which access is gained, top-level domain, web browser used, operating system used). We use these data for statistical purposes, for technical analysis, to optimise the server infrastructure, to ascertain the frequency of access and to improve user-friendliness and functionality.

## 3. Use of cookies

Our Website uses what are known as cookies. Cookies are small text files that are stored by the browser on your end device. They do not cause any damage, and serve only to make it easier for you to use and individualise our Website.

If you do not wish for cookies to be used, you can set up your browser so that it informs you about the setting of cookies and enables you to allow this on a case-by-case basis. In addition, the most commonly-used browsers have a settings option enabling you to block or to disable cookies. Instructions on how to manage cookies on your browser can usually be found under the browser's help function or in the instruction manual of your end device.

For the most commonly-used browsers, instructions on how to disable cookies can also be found at the following links:

- Internet Explorer: support.microsoft.com/en-us/help/17442/windows-internet-explorer-delete-manage-cookies
- Firefox: support.mozilla.org/en-US/kb/enhanced-tracking-protection-firefox-desktop
- Chrome: support.google.com/chrome/answer/95647?hl=en&hlrm=en
- Safari: support.apple.com/guide/safari/manage-cookies-and-website-data-sfri11471/mac
- Opera: help.opera.com/en/latest/web-preferences/#cookies

Rejecting or disabling cookies, can, however, restrict the functionality of the Website.

#### 3.1 Technically essential cookies

Some cookies are necessary in order for our Website to function. Technically essential cookies remain stored on your end device for the intended duration (see table) or until you delete them.

You can delete technically essential cookies from your browser after using the Website.

We use the following cookies:

Technically essential cookies						
Cookie name (type)	Provider	Description	Duration			
AL_SESS_PR-S (HTTP)	SS_PR-S (HTTP) LGT Stores an identifier to assign page views to a specific user session (Session ID).		Session			
LGT-Cookie (HTTP)	LGT	Stores the cookie banner settings and the settings for external content (maps, videos).	365 days			
lgtdomicil (HTTP)	LGT	Stores the domicile selected.	30 days			
LGT-Cookie (HTTP)	LGT	Stores the cookie banner settings and the settings for external content (maps, videos).	365 days			

#### 3.2 Statistic cookies

We strive to continuously improve our Website. To this end, cookies are used for website and performance analysis. These are cookies that provide us with overall statistics on the number of Visitors, the pages visited, etc. As a result, we receive statistical analyses, which we use to establish whether the Website is designed to meet the intended needs. Our providers are not able to identify you or to establish a connection with your person during this process.

We use the following cookies:

Statistical cookies							
Cookie name (type)	Provider	Description	Duration				
_ga Google LLC		Serves to distinguish between users. Registers a unqiue ID to generate statistical data on how a visitor uses the website.	2 years				
_gat	Google LLC	Used to restrict the frequency of queries to Google Analytics.	1 minute				
_gid	Google LLC	Stores an identifier to associate requests with a particular logged-in user session.	24 hours				

You can prevent the use of statistic cookies by not selecting 'Statistics' in the 'Cookie information' pop-up that appears when you visit the Website and clicking on 'Confirm selection'.

## 3.2.1 Google Analytics

Provided by Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA ('Google').

The cookies used for analysis by Google Analytics do not contain any personal data. Your IP address is abbreviated directly on your computer. Your IP address is sent to Google Analytics in this anonymised form. Google Analytics will not link your IP address to other information held by Google Analytics and will only pass on data to third parties where this is provided for by law. Information on the services and privacy policy of Google Analytics at can be found at:

## support.google.com/analytics/answer/6004245?hl=en

You can prevent the use of cookies by Google Analytics by not selecting 'Statistics' in the 'Cookie information' pop-up that appears when you visit our Website and clicking on 'Confirm selection'.

# 3.3 Targeting cookies

When visiting some of our pages, temporary cookies may be saved on your end device by targeting service providers. These cookies are automatically deleted after a defined period of time. Targeting refers to a process that enables the display of target group-specific or individualised content on websites. These cookies contain computer-generated alphanumeric identifiers that do not permit any conclusions about your person or the IP address of your computer.

These targeting cookies are used as follows:

- 1. to offer you more relevant and useful ads and to limit the display frequency of certain ads;
- 2. to help us improve the effectiveness of our advertising measures;
- 3. to display LGT ads when you visit external websites with which we maintain marketing relationships.

This information may be shared with third-party providers and advertisers. We use the following cookies (for further information see also Section 3.3.1 to 3.3.4):

Marketing cookies							
Cookie name (type)	Tool/Platform	Provider	Description / Privacy Policy	Duration			
_fbp	Facebook	Facebook Inc.	Stores and track visits across websites (facebook)  www.facebook.com/policy.php	90 days			
AnalyticsSyncHistory	Linkedin	Linkedin	LinkedIn Ireland Unlimited Company	30 days			
bcookie	Linkedin	LinkedIn Ireland Unlimited Company	Stores browser details	2 years			
bscookie (HTML)	LinkedIn	LinkedIn Ireland Unlimited Company	Stores performed actions on the website	2 years			
lang	LinkedIn	LinkedIn Ireland Unlimited Company	Remembers the language setting of a user	Session			
li_alerts	LinkedIn	LinkedIn Ireland Unlimited Company	Tracks impressions of LinkedIn messages, such as the cookie banner, and set the time interval between messages	1 year			
li_gc	LinkedIn	LinkedIn Ireland Unlimited Company	Stores the consent of guests to the use of cookies that are not mandatory	2 years			
lidc	LinkedIn	LinkedIn Ireland Unlimited Company	For selection of the data center	24 hours			
UserMatchHistory	LinkedIn	LinkedIn Ireland Unlimited Company	Synchronises LinkedIn Ads IDs	30 days			

You can prevent the use of targeting cookies by not selecting 'Marketing' in the 'Cookie information' pop-up that appears when you visit our Website and clicking on 'Confirm selection'.

## 3.3.1 LinkedIn

We use conversion tracking on our Website with the LinkedIn Insight Tag, a tool provided by LinkedIn Ireland, Wilton Plaza, Wilton Place, Dublin 2, Ireland.

For this purpose, the LinkedIn Insight Tag is integrated on our pages and is placed as a cookie on the end device of the Visitor by LinkedIn. This informs LinkedIn that the Visitor has visited our Website. The IP address is also collected in this process. Moreover, timestamps and events such as site views are stored. This allows the statistical analysis of website use in order to optimise use of our Website. As a result, for example, we learn via which LinkedIn ad or interaction on LinkedIn a Visitor came to our Website.

The data may be stored and processed by LinkedIn, such that a connection to the respective user profile is possible and LinkedIn can use the data for its own advertising purposes.

## 3.3.2 Facebook and Instagram

We use Facebook Pixel to display our personalised advertising on the Facebook and Instagram platforms. Facebook and Instagram are operated by Facebook Ireland Ltd., 4 Grand Central Square, Grand Canal Harbour, Dublin 2, Ireland.

To this end, information about user activity on our Website and further specific personal data (such as Pixel ID and the Facebook cookie) are sent to Facebook using Pixel. In particular, this information also includes http headers and click data. This allows interest-based advertising to be displayed to Visitors of our Website when visiting the social network Facebook or Instagram or other websites which likewise use this function.

The browser establishes a direct connection with the Facebook server due to the marketing tools used. We have no influence on the scope and further use of data that are collected by Facebook through the use of Pixel. By integrating Facebook Custom Audiences, Facebook is informed that a Visitor has accessed one of our corresponding online offers or has clicked on one of our ads. Insofar as the respective Visitor is registered with one of the Facebook services, Facebook is able to assign the visit to the respective account. Even if a Visitor is not registered or logged in on Facebook or Instagram, it is possible that the provider gains knowledge of and stores the IP address and other identifying information. Facebook Pixel enables the measurement, analysis, and optimization of the effectiveness of Facebook ads for statistical purposes and the purposes of market research. We only receive reports from Facebook in anonymised form.

#### 3.3.3 Twitter

We have integrated the remarketing function of the short messaging service Twitter Inc., 1355 Market Street, Suite 900, San Francisco, CA 94103, USA on our Website.

This function enables us to target Visitors with interest-based advertising on the Twitter platform. Twitter uses tags for this purpose. Visits to our Website as well as data on use (e.g. all interactions with respect to the advertising displayed, clicks on links, retweets or likes) are collected in pseudonymous, not personal form using this tag. If a Visitor subsequently visits Twitter, they will be shown advertising based on their interests. As a result, Twitter is informed that our Website has been accessed from the end device of the Visitor. If the Visitor is registered with a Twitter service, Twitter is able to assign the visit to an account. Even if a Visitor is not registered or logged in on Twitter, it is possible that the provider gains knowledge of and stores the IP address and other identifying information. The information generated by the tags on the use of our services is sent to a Twitter server in the USA, where it is stored.

## 3.3.4 Google

## **Google Analytics Remarketing**

We use the functions of Google Analytics Remarketing on our Website in conjunction with the cross-platform functions of Google Ads. The provider is Google Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA.

This function enables the advertising target groups defined with Google Analytics Remarketing to be combined with the cross-platform functions of Google Ads. As a result, depending on the previous usage and surfing behavior of a Visitor using an end device, interest-based, personalised advertising can also be displayed on another end device of the Visitor. Where relevant consent is provided, Google combines the web and app browser history with the Google account of the Visitor for this purpose. In this way, the same personalised advertising can be displayed on any end device on which the Visitor is logged in with their Google account. To support this function, Google Analytics collects Google-authenticated IDs, which are temporarily linked with our Google Analytics data in order to define and create target groups for cross-platform advertising.

## **Google Ads and Google Conversion Tracking**

This is the online advertising program of Google Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043, United States.

We use conversion tracking in connection with Google Ads. When an ad placed by Google is clicked, a cookie for conversion tracking is placed on the end device of the Visitor via the Internet browser. When visiting certain pages of our Website, Google recognises that the Visitor has clicked on the ad and was redirected to this page. The information collected with the help of the conversion cookie is used for our conversion statistics (e.g. total number of Visitors who clicked on our ad and were redirected to a page featuring a conversion tracking tag).

# Google DoubleClick

DoubleClick by Google Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043, United States uses cookies to place ads relevant for visitors, to improve reports on campaign performance or to prevent a Visitor from seeing the same ads on multiple occasions. Google uses a cookie ID to learn which ads are placed in which browser and can thereby prevent the ads from being displayed multiple times. Using cookie IDs, DoubleClick is also able to collect conversions that relate to ad requests. According to Google, DoubleClick does not collect any personal information.

Your browser automatically establishes a direct connection with the Google server due to the marketing tools used. We have no influence on the scope and further use of the data that Google collects with the use of this tool; we therefore inform you according to the best of our knowledge. As a result of the integration of DoubleClick, Google is informed that you have accessed the relevant part of our Website or clicked on our ads. If you are registered with a Google service, Google is able to assign the visit to your account. Even if you are not registered or logged in with Google, it is possible that the provider gains knowledge of and stores your IP address.

# 4. Incorporation of third-party services and contents

Third-party content and services may be incorporated into our Website (known as externally embedded components or plugins/widgets). These always require that the Third-party Providers of such content use Visitors' IP addresses, as no content can be sent to the Visitor's browser without the IP address.

We have no control over the amount of information that these Third-party Providers collect by means of the button or as a result of your use of pages that incorporate certain third-party services. If you use the services of Third-party Providers, the responsibility for the further processing of data lies with the respective third-party provider.

On our Website, we use the following third-party products for these purposes:

#### 4.1 Simplex Videos

Provided by xtendx AG, Adlikerstrasse 246, 8105 Regensdorf, Switzerland.

As soon as you play a Simplex video on a page, information on user behavior is collected using cookies. Simplex generates viewing statistics of the videos and analyzes these. Information about the data collected by Simplex and about Simplex's services and privacy policy can be found at:

www.xtendx.com/en/about-us/privacy-policy.html

Content from video platforms is blocked on our Website by default. You can prevent the use of cookies by Simplex by not clicking on the play symbol that is shown on the videos. By clicking on the play symbol or the field 'Always allow videos' you agree to the setting of cookies and the transmission of personal data to xtendx AG.

## 4.2 Google Maps

Provided by Google Maps (API) of Google LLC., 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA ('Google') shows our locations and makes it easier to find your way to us.

If you click on pages incorporating maps provided by Google Maps, data (e.g. IP address) are transmitted to and stored on Google's systems in the US. Google creates and analyzes user profiles. If you have a Google account and are logged in to this account, your data are also linked to your Google account. You have the right to object against the creation of user profiles, which you can exercise towards Google. Information about the services and privacy policy of Google and Google Maps can be found at:

policies.google.com/terms?hl=en&gl=en www.google.com/intl/en\_US/help/terms\_maps/ policies.google.com/privacy?hl=en&gl=en

Content from Google Maps is blocked on our Website by default. You can prevent Google Maps from using cookies by not clicking on the 'Load Map' button that appears on the maps. By clicking on the 'Load Map' symbol or the 'Always allow Google Maps' box, you consent to the setting of cookies and the transfer of personal data to Google Maps.

## 5. Newsletter

You can subscribe to our newsletter on our Website. To this end, we require your e-mail address and potentially further information for personalization purposes as well as your confirmation that you agree to the newsletter subscription.

Once you have subscribed to the newsletter, you will receive a confirmation e-mail containing a link to confirm the subscription.

You can cancel your newsletter subscription with effect for the future at any time by clicking on the corresponding link in the newsletter. Your data collected in connection with the mailing of the newsletter will then be deleted, unless you have granted explicit consent to the continued use of your data or we have reserved the legal right to continue to use your data.

The mailing of our newsletters and the processing of the data of the newsletter recipients is carried out by contracted providers or their subcontractors, who are based in the EU and are obligated to comply with the GDPR.

#### 6. Data protection

# 6.1 Data processing

Where we collect further personal data through our Website, you are informed on the corresponding pages. We use the personal data for the processing of which you have given us your consent (e.g. provision of newsletters or brochures) or which are necessary for contract fulfillment or in connection with the initiation of business.

Personal data that we collect via our Website are only used for the purposes that result from the page in question and will be stored until these purposes have been fulfilled. In the event of the conclusion of a contract, the data from the contractual relationship will be stored until the statutory retention or limitation periods have expired.

The data collected on our Website that have been entered by you are forwarded to the competent unit within LGT Group. The data remain confidential during this process. The data are not disclosed to third parties, unless required (e.g. the mailing of newsletters or brochures by a provider).

The use of state-of-the-art security software and certified encoder and encryption procedures ensure that our IT infrastructure complies with international security standards. We have also implemented additional comprehensive security measures and technical as well as organizational measures to protect your data against loss, unauthorised access and misuse in accordance with state-of-the-art technology for Internet access to accounts and custody accounts.

Irrespective of the measures taken to protect your data, data protection and confidentiality may be limited when data is processed via universally accessible media. When using the Internet to send transmissions from a computer, mobile phone or another end device, it cannot by its nature be excluded that third parties can obtain access to your data and in so doing, can draw inferences concerning possible business relationships, or that personal data are transmitted to third countries without our cooperation or knowledge or are misused.

We recommend that particularly sensitive data, especially personal data and data relating to client relationships (account, custody account, transactions, etc.), be transmitted only via secure communication channels. Due to the risks involved, your entry or transmission of personal or business data within the scope of our Website or other digital services is done voluntarily and without any assurances. We do not accept any liability for direct and indirect damages arising in connection with the use of our Website, digital services or their contents.

## 6.2 Legal basis and purposes of processing

Your data are processed on the basis of a legitimate interest (Art. 6 para. 1 (f) GDPR) for the following purposes:

- As the operator of the Website, we have a legitimate interest in the effective design of our Website, the highest degree of stability and functionality of our Website, the statistical analysis of visitor behavior for optimization and marketing purposes, the targeted advertising or personalised direct advertising and the secure, user-friendly mailing of newsletters.
- Due to the legitimate interest of a Third-party Provider to incorporate personalised advertising based on Visitors' surfing behavior or on market research. The third-party providers have undertaken to observe the standard contractual clauses regarding the collection, use, and storage of personal data from EU member states.

Where required, your data can also be processed for the purposes of performance of a contract or the initiation of business contact or on the basis of your explicit consent.

#### 6.3 Your rights

You have the following data subject rights with regard to your personal data (Art. 15 to 21 GDPR):

- The right to information: you can request information about whether and to what extent we process your personal data.
- The right to rectification, erasure and restriction of processing: you can have inaccurate or incomplete personal data rectified or you can demand that your data be erased (e.g. if they are no longer necessary, you have withdrawn your consent, or these data are being unlawfully processed) or that the processing thereof be restricted.
- Right of revocation: you can revoke your consent for the processing of your data at any time. The revocation of consent is only effective for the future and does not have any impact on the lawfulness of the data processed until the time of revocation.

  Revocation also has no impact on data processing conducted based on a different legal basis.
- Right of data portability: you can have the data which you have provided to us transmitted in a structured, commonly-used and machine-readable format.
- Right to lodge a complaint: if you feel that your rights have been violated by our data processing, you can lodge a complaint with the United Kingdom Information Commissioner's Data Protection Office or another supervisory authority of an EU or EEA member state (e.g. in your place of residence or work or in the place where the GDPR was violated).

The contact details of the competent supervisory authority of LGT Wealth Management UK LLP clients are:

Information Commissioner's Office Wycliffe House, Water Lane Wilmslow, Cheshire SK9 5AF Great Britain

Phone: +44 303 123 1113

www.ico.org.uk

## 6.4 Right to object

- In individual cases: if the processing of your data is carried out in the public interest or to safeguard legitimate interests by us or a third party, you can object to this processing at any time on grounds relating to your particular situation.
- Direct marketing: you can object informally to the use of your data for direct marketing purposes. In the case of such an objection from you, we shall no longer process your data for such purposes.

#### 6.5 Contact

Please contact us at the following address if you have any questions regarding data protection or wish to exercise your rights: The registered address and phone number of LGT Wealth Management UK LLP is:

14 Cornhill London EC3V 3NR Great Britain

Phone: +44 203 207 8000.

LGT Wealth Management reserves the right to change this data privacy notice from time to time and revised terms will be posted on our website.

If you have any questions about this data privacy or the information we collect and use about you, please contact the Data Protection Officer;

Barbara Kane LGT Wealth Management UK LLP 14 Cornhill London EC3V 3NR Great Britain

E-mail: dpo-uk@lgt.com Phone: +44 203 207 8000

#### Important information

LGT Wealth Management UK LLP is authorised and regulated by the Financial Conduct Authority. Our regulation details are set out in the FCA register: Firm Reference No: 471048 www.fca.org.uk/register. Registered in England and Wales: OC329392. Registered office: 14 Cornhill, London, EC3V 3NR. Any information herein is given in good faith, but is subject to change without notice.