

## **Privacy Statement**

### **1. General**

Stern Advisory Group takes data privacy seriously. We have a global policy, that we follow worldwide, which is based on EU data protection principles.

This statement explains how we may collect and process information about:

- visitors to our website
- people who use our services e.g. clients or other subscribers to our online services
- job applicants and our current employees

Our "website" includes this website and our associated companies sites.

We use cookies on our website and this is explained below.

### **2. Submitting your contact details**

On various occasions, including through forms on our website, we invite or request you to submit your contact details and other information about yourself or your organisation, or to send us emails which will, of course, also identify you.

### **3. How we use this information**

In each case, the purpose for which you are invited to give us information is clear. We will not use your information for purposes that are not clear when you provide your details, and will not disclose it outside Stern Advisory Group, except to service providers acting on our behalf or in other very limited circumstances, for example, with your agreement or where we are legally obliged to do so.

#### **4. If you do not want to receive information from us**

If we propose to use your details to send you information from Stern Advisory Group about events or market developments which we believe may be of interest to you (other than information that you have specifically requested), we give you an opportunity to tell us that you do not wish to receive such information by ticking a box; alternatively, you can let us know your preferences by sending an email to [sag.dpo@sternadvisory.com](mailto:sag.dpo@sternadvisory.com), or by contacting our administrator by telephone on +44 (0)20 3130 4000 or by post to 33, St. James's Square, London SW1Y 4JS, England.

#### **5. Transfer of information abroad**

Stern Advisory Group operates through its various local legal entities which we add to or reorganise from time to time. When you provide information to any part of Stern Advisory Group you will in most cases be providing it to Stern Advisory Group as a whole, and should be aware that it may be accessed from countries whose laws provide various levels of protection for personal data, not always equivalent to the level of protection that may be provided in your own country.

#### **6. Security**

We have robust information security management systems in place to protect your personal information, maintaining internal information security and DPA.

#### **7. Cookies**

Cookies are small text files that are placed on your computer by websites you visit. Cookies help make this website work and provide information to us about how users interact with our site. We use this information to improve our website.

The cookies we use help to provide us with anonymised, aggregated technical information. This is principally so that we can make sure that the website is easy to

navigate, identify the areas that are of particular interest to visitors and generally improve the site and our services. The information that we collect in this process will not identify you as an individual. We do not seek to identify individual visitors unless they volunteer their contact details through one of the forms on the site. In some circumstances our records will identify organisations visiting our site and we may use that information in managing our relationship with those organisations, for example, in considering how to develop the services that we offer them.

By using our website you agree that we can place these types of cookies on your device.

When you accessed this website our cookies were sent to your web browser and stored on your computer. If you wish to remove them, you can manage this via the settings on your browser, but note that this may impact your ability to utilise this and other web sites. The way to clear cookies varies from one browser to another. You should look in the "help" menu of your web browser for full instructions. For your reference, please click the following links for details on how to manage cookies in each of the major web browsers:

- IE(<https://support.microsoft.com/en-gb/kb/278835>)
- Firefox  
(<http://support.mozilla.org/en-US/kb/delete-cookies-remove-info-websites-stored>)
- Chrome  
(<http://support.google.com/chrome/bin/answer.py?hl=en&answer=95647>)
- Opera (<http://www.opera.com/browser/tutorials/security/privacy/>)
- Safari (<http://support.apple.com/kb/PH5042>)
- Safari for iPad and iPhone (<http://support.apple.com/kb/HT1677>)

## **8. Analytics and anonymisation**

This website uses Google Analytics, a web analytics service provided by Google, Inc. ("Google"). Google Analytics uses cookies (see above), to help us analyse how users use our site. The information generated by the cookie about your use of the website will be transmitted to and stored by Google on servers in the United States. We have activated IP-anonymisation, which will anonymise your IP address by cutting it short. In most cases this procedure will be carried out within the area of the European Union and other parties to the European Economic Area Agreement. In exceptional cases the whole IP address will be first transferred to a Google server in the USA and then shortened there. Google will use the information on behalf of Stern Advisory Group for the purpose of evaluating your use of the website, compiling reports on website activity for us and providing us with other services relating to website activity and internet usage. The IP address that your browser conveys within the scope of Google Analytics, will not be associated with any other data held by Google. You may refuse the use of these cookies via the settings in your browser as explained above. You can also opt out of being tracked by Google Analytics in the future by downloading and installing Google Analytics Opt-out Browser Add-on for your current web browser:

<http://tools.google.com/dlpage/gaoptout?hl=en>

## **9. Anti-money laundering policies and procedures**

Our anti-money laundering (AML) policies are generally based on the highest standards that are required in the jurisdictions where we operate, and apply in relation to all of our business in all of our offices all over the world. The Firm conducts client due diligence enquiries on each new client and persons connected with them and conducts ongoing monitoring of existing clients. These enquiries are based on the FATF Recommendations, and the EU Fourth Money Laundering Directive, although if additional information is required by the local rules of any country where we are being asked to work, that information will also be obtained. Where necessary for these purposes, we seek relevant information from third party data suppliers. Where individuals have supplied personal data for this purpose we will only use it for that purpose and will keep it only as long as the relevant AML and data protection legislation requires.

Stern Advisory Group also has internal procedures to ensure that any suspicions of money laundering are reported to the appropriate authorities where there is an obligation to do so. Compliance officers and other relevant staff are provided with training on these issues.

## **10. Voice calls**

We record all voice calls to our London office switchboard but the recording ends when the call is transferred onwards.

## **10. Contacts**

If you have any questions about our privacy policies, want to exercise your right to see a copy of the information that we hold about you, or think that information we hold about you may need to be corrected, want to delete all or any part of it or to object to the

processing on legitimate grounds, please contact us, or alternatively send a signed letter addressed to the Senior information risk officer of the relevant office.