

# PRIVACY POLICY

## Use of Personal Data for Members of Savvy Investor

This Privacy Policy forms part of the Terms of our User Agreement. It describes our use of the Personal Information we collect from you in connection with your use of the Site. By registering on Savvy Investor, you acknowledge that the submission of Personal Information is voluntary on your part, and signify your consent to us collecting and using your Personal Information for the purposes described here.

### 1. Introduction

Savvy Investor ([www.savvyinvestor.net](http://www.savvyinvestor.net)) is a “knowledge network” for institutional investors and their service providers. The Site is operated by SavvyPro Networks Ltd (“we”, “us” and “our”) a company incorporated in England and registered under UK data protection legislation as a data controller, with registration reference A8007067.

We reserve the right to change this Policy from time to time. We will inform you of material changes, both here in our Privacy Policy, and by email or by notice on our home page, so that you may make an informed decision and keep your preferences up to date. If you continue to use the Site after we publish or communicate a notice about changes to our Privacy Policy, you will be deemed to consent to the changes. If you object to any changes, you may [close your account](#).

It is important to us that you are confident that we conduct our business in a professional and transparent manner and handle your personal data responsibly in the conduct of our business.

### 2. Personal Information we collect from you

We may collect and hold the following “Personal Information” from you:

- a. User Profile information, which you provide to us upon registration and then may expand upon in due course. This may include your name, contact details, employment / professional details, your user preferences, and other User Profile information. Please do not post personal data to your profile that you would not want to be publicly available.
- b. Data on your use of the Site may be automatically collected, including your IP address, operating system and browser, the pages viewed / content clicked and services used, including the URL of the website address that you are on immediately before and after using our Site.
- c. Information you provide to us when communicating in person, by phone or email.
- d. You may post content to the Site, including without limitation papers, articles, jobs, company profiles, conferences, various forms of advertising, and communication through our messaging systems. We hold data containing records of all such contributions made by you.

- e. You may also choose to “import” contact information such as your email address book, in order to invite your contacts to join Savvy Investor. We will not use or share this information for any purpose other than to invite your contacts to join the Site or to connect with you. You may remove this information at any time, by deleting your list of “imported contacts”.
- f. If you use the Site to apply for a job, sending a CV or other documentation, such documents will be stored on our systems, but not shared with any other person or used for any purpose other than to provide the recruiter with information.

We may also monitor usage of the Website by our members and collect and analyze such data on an anonymous basis. This includes data which would be “Personal Information” except that it is processed anonymously. This may include data related to pages viewed, and services used.

Any financial information, such as credit card details, that you supply in connection with transactions is not held by us, but is held securely on the PCI-compliant servers of our payment service provider.

### **3. Why and how we use your personal information**

A professional knowledge network is built upon the sharing of Personal Information including contributed content. The main reason we collect and keep Personal Information from Members is to allow the Site to function effectively; allowing you to display your User Profile and Content on the Site, allowing members to search for relevant information, and allowing us to send you routine emails, notifications, newsletters and so forth as described below.

#### **Your contributions**

Any articles, papers, conferences, jobs or company profiles you create or edit may be viewed by all Members.

#### **Your user profile**

Any Member can view a short summary of your User Profile, consisting of your name, job title, company and location. However, you can use your “Privacy Settings” in “Preferences” to control who may view your full User Profile. Your full User Profile (except for any elements that you have indicated in “edit profile” that you wish to keep private) can be viewed by all Members, unless you amend your “Privacy Settings” to restrict this. By default, any registered member may see who/what topics you follow, and who is following you. However, you may restrict this using your “Privacy Settings.”

We will use User Profile data on an anonymous basis to inform us of the size and aggregate profile of our membership, to inform our marketing campaigns, guide our business strategy, and help us to improve the Website. We may share our analysis of aggregated data privately or publicly, including on the Site itself. These statistics do not include any Personal Information that may be linked to individual Members.

#### **Routine emails**

We use your information to send you routine emails such as welcome messages, password-related messages, website announcements and so forth.

**Tailoring the site to your interests**

We use your personal information to create a more personalized experience, tailored to your interests. Your topic preferences are used to determine the content and advertisements that you see on the site, including, without limitation, articles, papers, conferences, jobs and banner ads. If you prefer to receive a non-personalized service you may adjust your [topic preferences](#).

**Personalized newsletters, thematic emails and promotions**

We will use your information to send you tailored content: a weekly email newsletter, tailored to your interests and profile and occasional thematic or promotional emails tailored to your interests and profile. You may opt in or opt out of receiving such communications through the “preferences” section of the site.

**Email Notifications**

We will use your information to send you site notifications: activity relevant to you on the Site, such as invitations to “connect” with other members, or notifications relating to the operation of the site. You may opt in or opt out of receiving such communications through the “preferences” section of the site.

**Your use of the Website**

We will track the “user journey” of Members while on the Site, including which pages, content and advertisements a Member views while using the Website. By understanding how members use Savvy Investor, we can improve the Site and provide a better service. We do not have the facility to operate a “do not track” policy for individual members.

We may also use your IP address to assist our administration of the Site, diagnosing problems with our servers or software and to collect information regarding Site usage.

We may use and allow others to use Cookies and similar technologies in the operation of the Website. For further details, see the relevant section below on “use of Cookies”.

**Contact Information and Third-Party Data**

If you contact us by telephone, e-mail or letter, we may keep a record of your communication. We may ask for, or use, your User Profile information in order to reply. If other users or third parties send us correspondence about your activities or purchases on the Website, we may keep the information in a file specific to you. All such information will be held as Personal Information and will be used only for the purposes identified in this Privacy Policy.

**Periodic backups**

We periodically save copies of the entire Website and all its Content. This serves firstly to maintain the security and integrity of the site, and secondly to enable us to comply with any requirement to disclose information for legal or regulatory purposes.

## 4. Why and how we may share your personal information

**Sharing your personal information with our “partners”**

In order to provide the Site as a free service to Members, Savvy Investor partners with a number of asset management companies and other service providers (collectively, “Partners”). When you download Partner content, we may share with them details from your user profile, including your name, job title, company, location and email address. We will

also share the title of the content you downloaded and when it was downloaded. However, we will only share this information when you consent as follows:

Whenever we offer Partner content for download, we will display a disclosure, informing you that by downloading the content, you agree to share your contact information with the Partner and to potential follow-up communication. We will only share your information with the Partner if you then proceed to take affirmative action by downloading the content.

The Partner will use this information to build a better picture of who is downloading their content. They may also contact you directly by email for business purposes.

**Sharing personal information with “data processors”**

We may share Personal Information with third parties (“data processors”) providing services to us under strictly controlled conditions, processing your Personal Information only in accordance with our instructions. Examples of such processing include web hosting, secure data storage and email transmission.

**Sharing personal information with Company Managers and other colleagues**

If you register on the Site as an employee of a company, your company may have a “Company Manager” who controls the roles and permissions of employees on the Site. We may send the Company Manager a periodic email showing the written contributions of all employees (excluding job applications). We will also make available to Company Managers the facility to download a file, displaying the written contributions of any employee (excluding job applications). We may also disclose your membership to other colleagues from your company, when such information is requested.

**Legal or regulatory reasons for sharing Personal Information**

It is possible that we may be asked by regulators or legal authorities to provide Personal Information regarding a Member, Members, including their Content. We may disclose such information upon reasonable request, and we may do so without prior notice to you. We will fully co-operate with law enforcement agencies to identify those who use the Website for illegal activities and reserve the right to report to law enforcement agencies any activities that we believe to be unlawful.

At our absolute discretion, we may also disclose Personal Information to third parties if we believe that such disclosure is reasonably necessary to enable us or others to fulfill legal or regulatory obligations. This may include providing personal Information regarding an employee to a Company representative (such as a Compliance Officer) in order for that Company to satisfy its regulatory obligation to examine the history of Content contributed by that employee.

**Sale or reorganization of the business**

We reserve the right to disclose and transfer your Personal Information to a third party, in the event that SavvyPro Networks Ltd, or the business activities relating to the operation of the Website, are sold or transferred, in whole or in part. The new person or entity will be permitted to continue to use the Data for the purposes for which it was supplied by you.

## 5. How to update, correct or remove your personal information

You may view, edit or delete the personal information that you have provided to us through your User Profile and Settings pages. If your information changes or becomes inaccurate, we ask you promptly to update it. You may view, edit or delete any Content that you have contributed to the Site. You may also ask us to correct any data relating to you by emailing [support@savvyinvestor.net](mailto:support@savvyinvestor.net).

You may close your account and remove all Content owned by you by emailing [support@savvyinvestor.net](mailto:support@savvyinvestor.net). Upon termination of membership, your Personal Information will no longer be visible on the site, but your data will remain archived in our database for five years, in order to enable us to comply with any unanticipated information request from any regulatory authority.

You may also ask us to delete all of your Personal Information, or remove consent for processing your personal information, by emailing [support@savvyinvestor.net](mailto:support@savvyinvestor.net). Your information will no longer appear on the Website and we will remove your information from our “live” internal databases. However, because we “back up” the data stored on our systems, such prior information will not be removed from our archived databases.

You have the right to access or take your personal data at any time, by emailing us at [support@savvyinvestor.net](mailto:support@savvyinvestor.net). We will provide this information within 30 days of such request, for a small administrative charge.

## 6. Your choices regarding your information

You may view and edit your User Preferences on the Website to control the following:

- a. Who may view the full version of your User Profile
- b. The frequency with which you receive a Newsletter tailored to your interests
- c. To opt out of receiving newsletters or marketing emails, sent by us on behalf of third party advertisers and carefully tailored to your interests.
- d. Whether our “Partners” can receive information about you

You may set your browser to restrict the use of Cookies. However, this may result in difficulty in using certain aspects of the Website.

## 7. Other important information

### Lawful Bases for Processing

We will only collect and process personal data about you where we have lawful bases. Lawful bases include consent (where you have given consent), contract (where processing is necessary for the performance of a contract with you, to deliver services you have requested) and “legitimate interests”.

Where we rely on your consent to process personal data, you have the right to withdraw or decline your consent at any time and where we rely on legitimate interests, you have the

right to object. If you have any questions about the lawful bases upon which we collect and use your personal data, you may contact us by email at [legal@savvyinvestor.net](mailto:legal@savvyinvestor.net).

### **Protecting your personal information**

All personal information is stored securely in accordance with the principles of the EU General Data Protection Regulation (GDPR). We take seriously our responsibility to ensure appropriate security for your personal information, and although we cannot guarantee absolute security, the Website has in place measures to protect your data. Your personal information is kept on secure, password protected, limited access servers. Internally, access to your Personal Information is allowed only to those who require such access and we require that such passwords remain confidential. Sensitive data (such as credit card information) is protected by SSL encryption and we require that any third party, such as a payment service provider, who receives your Personal Information, has in place robust procedures to ensure the security of the information.

Unfortunately, the transmission of data via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of data transmitted to our site; any transmission is at your own risk.

### **Cross-border data transfers**

The data that we collect from you may be transferred to, and stored at, a destination outside your country, and outside the European Economic Area (“EEA”), but only where that country or territory ensures an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal data. By submitting your personal data, you agree to any such transfer, storing or processing. We shall take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

### **Privacy policies of third party sites**

You may link to third party sites through the Website. Each of these has their own privacy policies and data collection, use and disclosure practices, and you should consult the privacy policy of each site before providing them with your data. These sites may send their own cookies to users, collect data, or solicit personal information. We are not responsible for the policies or practices of third party sites.

## **8. Contacting us with questions about privacy**

If you have any questions about this Privacy Policy, the practices of this Website, or your dealings with this site, you may contact us by email at [legal@savvyinvestor.net](mailto:legal@savvyinvestor.net).

The Company’s Data Protection Officer is Andrew Perrins. He can be contacted at Savvy Investor, 23 Hinton Road, Bournemouth, BH1 2EF, UK, or by email via [legal@savvyinvestor.net](mailto:legal@savvyinvestor.net)

If you are not happy with any aspect of our Privacy Policy or Data Protection processes, we would ask you to contact us in the first instance. If you are still not satisfied, you have a legal right to complain to our supervisory authority, which is the [Information Commissioners Office](#) in the UK.

## 9. The use of Cookies on the Website

A “Cookie” is a small file residing on your computer’s hard drive. Often it contains an anonymous unique identifier and is accessible only by the site that placed it there.

We may use Cookies and similar technologies to improve your experience of the Site, serve advertising, and measure use of our services. By default, your browser will accept Cookies, but this can be altered by disabling Cookies in your web browser. For further details please consult the help menu in your browser. However, disabling Cookies may result in the loss of information that enables you to use the Site effectively. Certain features may not work should you elect to disable cookies. We shall have no obligation to restore full capability or to provide support to restore such capability.

Cookies that may be placed on your computer are detailed below:

### **Schedule of Cookies placed on the Website**

Savvy Investor uses Google Analytics (like most sites) which is a service provided by Google. They gather anonymous data of how people are using this site and then provide us with visitor statistics, details of page views etc.

The technical details logged are confined to the following items:

- The IP address of the visitor's web server
- The top-level domain name used (for example .ie, .com, .org, .net).
- The previous website address from which the visitor reached us, including any search terms used.
- Data which shows the traffic of visitors around this web site (for example pages accessed and documents downloaded).
- The type of web browser used by the website visitor.

Drupal (has\_js) - this cookie is set by the website system (which uses a content management system). The cookie records whether the user has javascript enabled which can help the site present information appropriately.

Drupal (SESS...) - this session cookie is set by the website system (which uses a content management system).

Google Analytics (\_\_utma, \_\_umtb, \_\_utmc, \_\_utmv, \_\_utmz) - these cookies are created by the website for use with Google Analytics. The cookies record information about the first visit to the site, the last visit to the site, the number of visits to the site, duration of site visits, the link or search terms used to get to the site.