



HUGO FORBES
BESPOKE INVESTMENT SOLUTIONS

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Privacy Policy



Privacy Policy

Hugo Forbes Ltd is committed to respecting your privacy and recognises your need for appropriate protection and management of any personally identifiable information ("Personal Information") you share with us. Hugo Forbes has established this Privacy Policy to let you know what information we may collect from you on www.hugoforbes.com (the "Site") and through various other communications with you, and how we may use and share that information.

Please take a moment to review the terms of our Privacy Policy. By using the Site and/or providing us with Personal Information, you agree to accept the terms of our Privacy Policy. If you do not agree to the terms of this Privacy Policy, please do not use the Site or provide us with any Personal Information. This Privacy Policy applies to information that we collect on the Site and to information which we may collect by other "offline" means, including, without limitation, sales calls and other business transactions with you.

Personal Information we may collect

Personal Information means any information that may be used to identify an individual, including, but not limited to, a first and last name, a home, business, or other physical address, a phone number, and an email address. We collect Personal Information from our Site users and customers only when such information is voluntarily provided to us, including, without limitation, in connection with inquiries about our services through the "Contact Us" page and Client Profile, or in the process of your business transactions with us. If you become a customer of Hugo Forbes, we will always retain the right to email you regarding the Site or services that we are providing to you.

How we may use your Personal Information

If you provide us with Personal Information, we may retain and use that information for several purposes, including, but not limited to, providing the services you request from us, verifying, vetting and carrying out security checks, record-keeping, market research, tracking and analysing activity on our Site, and complying with our policies and our legal and regulatory obligations.

We may also use your Personal Information for direct marketing purposes, if you have given your consent. You can change your mind about whether you wish to receive or stop receiving direct marketing at any time by contacting us.

The legal basis on which we rely to collect and process your Personal information

- For administration and service delivery - so we can do what you ask of us
- For regulatory matters - so we can comply with our legal obligations
- For direct marketing - so we can send you details of offers/opportunities and our newsletter if you have given your consent
- For our legitimate interests which are to ensure our services meet or exceed our legal obligations

Who We May Share Your Information With...

We may sometimes use other businesses to perform certain services for us, such as maintaining the Site and our e-mail services and processing inquiries. We may also share your Personal Information with specialist, third party FCA or SRA regulated service providers such as financial advisors, claims management companies and solicitors. Hugo Forbes will take reasonable steps to ensure that these third-party service providers are obligated to protect Personal Information on Hugo Forbes's behalf. Hugo Forbes will not sell or share your Personal Information with any unaffiliated third parties for marketing purposes. In the event that Hugo Forbes or all of its assets are acquired, all of the data collected by Hugo Forbes through the Site and through other means and services provided by Hugo Forbes would be among the transferred assets.

We reserve the right to disclose such information in special cases when we have reason to believe that disclosing this information is necessary to identify, contact, or bring legal action against someone who may be causing injury to or interference with (either intentionally or unintentionally) our rights or property, other visitors, or anyone else who could be harmed by such activities. We also reserve the right to disclose such information when we believe in good faith that the law requires it.

Non-Personal Information

From time to time we may collect general, non-personal, statistical information about the use of the Site, such as what sites visitors are coming from when they visit our Site, when they first visited our Site, their IP address, how many visitors visit a specific page on the Site, how long they stay on that page and which hyperlinks, if any, they "click" on. We may use the IP address to infer information about such visitor, including its company, city and state.

We collect this information through the use of "cookies" and other tracking technologies, which are discussed in greater detail below. We collect this information in order to determine which areas of the Site are most popular and to enhance the Site for visitors. We may group this information into aggregate visitor data in order to describe the use of the Site to our existing or potential business partners, sponsors, advertisers, or other third parties, or in response to a government request. However, please be assured that this aggregate data will in no way personally identify you or any other visitors to the Site.

Cookies and Other Tracking Technologies

Some of our web pages utilise "cookies" and other tracking technologies. A cookie is a small text file that a website transfers to an individual's web browser and is stored on the device. Cookies and other tracking technologies may record information such as URL and domain requests, referral URL, Internet protocol (IP) addresses, browser software and operating system types, clickstream patterns, and dates and times that our Site gets accessed. We, and/or our third-party advertising service providers, may place cookies or similar files on your computer for security purposes (such as authentication), to facilitate site navigation and to personalize your experience while visiting our Site. Cookies allow us to collect technical and navigational information, such as browser type, time spent on our Site and pages visited (these types of cookies are typically referred to as "Session Cookies").

We do not obtain, store or maintain any Personal Information about you through our use of cookies. Also, we do not link the information we store in cookies to any Personal Information you may submit while on the Site. However, we reserve the right to use IP addresses and other tracking technologies to identify a visitor only when we feel it is necessary to enforce compliance with the Site's policies, to protect the Site, our customers, or others, or when we believe in good faith that the law requires it.

You may set most browsers to notify you if you receive a cookie, or you may choose to block cookies with your browser. However, please be aware that some features of the Site may not function properly or may be slower if you refuse cookies.

If you have any questions regarding Hugo Forbes privacy practices, you are encouraged to contact Hugo Forbes at invest@hugoforbes.com

For further information on cookies and how to switch them off, see the Information Commissioner's website at www.ico.gov.uk or visit www.allaboutcookies.org or www.aboutcookies.org

Links to Other Sites

Please be aware that when you are on the Site, you could be directed to other sites that are beyond our control via hyperlinks. These other websites may send their own cookies to visitors, collect data, or solicit Personal Information. The privacy policies of these other sites may be significantly different from this Privacy Policy. We are not responsible for the privacy practices of these other sites and cannot guarantee the security of any of your Personal Information collected there.

Security

The security of your Personal Information is important to us. We take appropriate security measures to protect against unauthorised access to or unauthorised alteration, disclosure or destruction of data. These include internal reviews of our data collection, storage and processing practices and security measures, as well as physical security measures to guard against unauthorised access to systems where we store Personal Information. We restrict access to personal information to Hugo Forbes employees, contractors and agents who need to know that information in order to operate, develop or improve our services. These individuals are bound by confidentiality obligations and may be subject to discipline, including termination and criminal prosecution, if they fail to meet these obligations.

Recording and Monitoring

If we record and monitor telephone calls and any live chats for security purposes, to verify and demonstrate compliance with our legal obligations and to improve the quality of the services we provide to you, we will inform you prior to the recording.

Data Retention

We will normally keep your website enquiry Personal Information for 12 months after your enquiry. If, after this time, you have not taken up any further services with us, we will delete your data from our database.

Your rights

You have a number of legal rights in respect of your Personal Information. These include:

- **access.** The right to receive a copy of the Personal Information that we hold about you. The same right applies to any other person whose Personal Information you provide to us. We will require proof of identity and proof of authority if the request comes from someone other than the person whose data we are asked to provide. This will ensure we only provide information to the correct person. We normally expect to respond to requests within 28 days of receiving them.

- **withdraw consent to direct marketing.** You can exercise this right at any time and can update your preferences yourself or ask us to do it for you. See section 'How we may use your Personal information' above for details.
- **withdraw consent to other processing.** Where the only legal basis for our processing your Personal Information is that we have your consent to do so, you may withdraw your consent to that processing at any time and we will have to stop processing your Personal Information. Please note, this will only affect new activity and does not mean that processing carried out before you withdrew your consent is unlawful.
- **rectification.** If you consider any of your Personal Information is inaccurate, you can ask to correct it at: email
- **restriction.** In limited circumstances you may be able to require us to restrict our processing of your Personal Information. For example, if you consider what we hold is inaccurate and we disagree, the processing may be restricted until the accuracy has been verified
- **erasure.** In some circumstances, for example, where we have no legal basis for retaining your Personal Information, you may be entitled to require us to delete your Personal Information.
- **portability.** Where you have provided Personal Information electronically to us, you may be entitled to request us to provide that data to you or to have us transmit it to another organisation
- **to complain to the Information Commissioner.** If you have any concerns about the way we process your Personal Information, we would prefer you to let us know so that we can try to resolve the matter. However, you have the right to make a complaint to the Information Commissioner which is the supervisory authority in the United Kingdom.

Changes to Our Privacy Policy

The terms of this Privacy Policy may change from time to time. We will notify you of any material changes to this Privacy Policy by posting a notice on the homepage of the Site for a reasonable period of time after such changes are made that this Privacy Policy. We encourage you to check this page periodically for any changes. Your continued use of the Site following the posting of changes to these terms will mean you accept those changes.

Governing Law

This Privacy Policy will be governed by English Law and subject to the exclusive jurisdiction of the English Courts.

Hugo Forbes makes no representation that this Privacy Policy and such practices comply with the laws of any other country. Visitors who use the Site and reside outside the United Kingdom do so on their own initiative and are responsible for compliance with local laws, if and to the extent that local laws are applicable. If you reside outside of the United Kingdom, by using our Site, you consent to the transfer and use of your information outside your country.

Contacting Us

If you have any comments or questions regarding our Privacy Policy or want to make changes to the Personal Information we hold on you, please contact us.