

HULGRAVE - PRIVACY AND COOKIES POLICY

IMPORTANT INFORMATION AND WHO WE ARE

We are Hulgrave Limited (**Hulgrave, we, us and our**) and we operate under the name of FiPS – Financial Positioning System. We are committed to protecting your privacy. In this Privacy and Cookies Policy for www.hulgrave.com (**Site**) and any web or mobile application we provide which allows service ordering (**Application**) (together, our **Platform**), we explain **who we are, why and how we collect, store and use** (together, **process or processing**) **your personal information** (also referred to as personal data), **your rights** and **how to contact us**.

Please read this policy carefully to understand our views and practices regarding your personal information and how we will treat it. This policy is provided in a format which allows you to click through within specific areas to find out more information.

By engaging with our Platform and/or requesting our services, you acknowledge you have read and understood this privacy policy.

We are the data controller of the personal information processed in relation to this policy (except where this policy explains otherwise). This means we are responsible for treating your personal information safely, in accordance with applicable data protection and privacy laws. If you have any questions about how we protect your personal data, please **contact us**. We're registered with the Information Commissioner's Office (ICO) in the United Kingdom (UK).

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WHAT INFORMATION WE PROCESS

We will process the following types of personal information about you.

YOU PROVIDE US WITH

When you interact with us (for example, registering on our website, using our Application, uploading a statement or spreadsheet to our Platform, or sending us an e-mail), we collect the following types of personal information:

- **Identity information:** including a unique referral link or other ID number from your Wealth Manager(s) to help us verify your identity.
- **Contact details:** including name, phone number(s) and e-mail address.
- **Account Data:** including your username and password, your preferences and queries or feedback provided to us.
- **Financial information:** including the identity of your wealth advisor / manager, custodian and/or investment platform; any relevant account details (such as your account number, username and password) and information about your investments. Information about your investments includes details on the transactions, transfers, contributions and withdrawals you or your agents made; the value of your portfolio; the investments you hold and any distributions in relation to such investments (such as dividends and interest); the fees you pay in relation to your investments and your portfolio; and information on the risk profile and investment objectives applicable to you and/or your portfolio.

It is important that the personal information we hold about you is accurate and current. Please keep us informed if such information changes during your relationship with us.

YOUR WEALTH MANAGERS MAY PROVIDE US WITH

When you agree to our [Terms and Conditions](#) and register with us to receive portfolio analytics and comparison services from us (**Services**), we may also, with your authorisation and in order to provide the Services, get information from third party non-public sources, such as your wealth advisor/manager, your custodian and/or investment platforms (together, **Wealth Manager(s)**), as follows:

- **Identity information:** including a unique referral link or other ID number from your Wealth Manager(s) to help us verify your identity.
- **Financial information:** including the identity of your wealth advisor / manager, custodian and/or investment platform; any relevant account details (such as your account number) and information about your investments. Information about your investments includes details on the transactions, transfers, contributions and withdrawals you or your agents made; the value of your portfolio; the investments you hold and any distributions in relation to such investments (such as dividends and interest); the fees you pay in relation to your investments and your portfolio; and information on the risk profile and investment objectives applicable to you and/or your portfolio.

We will only receive your personal information from Wealth Managers with your authorisation, for example, where you have signed up for our Services under our [Terms and Conditions](#) with you, and data from a third party is required in order to enable us to provide you with our Services. **PLEASE ENSURE YOU KEEP YOUR UNIQUE REFERRAL LINK OR OTHER ID NUMBER PRIVATE, AND DO NOT SHARE IT.**

**OTHER PARTIES
MAY PROVIDE US
WITH**

We work closely with third parties (including, for example, business partners within the financial services industry, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, and search information providers).

*This may involve processing your **identity and contact information**, and your **financial information**.*

We will inform you via this policy (or at the time) if and when we receive information about you from them, and explain how and why we intend to use that information (including when combining it with data we already hold).

**WE
AUTOMATICALLY
COLLECT**

- **Technical information and information about your visit** (please click [here](#) if you would like more details)

See also the [Cookies section](#) below for more detail.

IF YOU DON'T PROVIDE THE MINIMUM REQUIRED PERSONAL DATA

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with the Services).

In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

HOW AND WHY WE USE YOUR INFORMATION

We've set out how we use each category of personal information, and what legal basis (or bases) allow us to undertake the processing. We explain more about what each legal basis means [below](#).

We may process your personal data based one or more than one legal basis, depending on the specific purpose(s) for which we are using your personal information. Please [contact us](#) if you would like further details about the specific legal basis we are relying on to process your personal data.

TYPE OF PERSONAL INFORMATION	HOW WE USE THIS PERSONAL INFORMATION	OUR LEGAL BASES FOR PROCESSING
<ul style="list-style-type: none">• Identity• Contact• Account• Financial	<ul style="list-style-type: none">• To register you as a new customer who wants to receive the Services.	Contract More info

<ul style="list-style-type: none"> • Identity • Financial 	<ul style="list-style-type: none"> • Your Wealth Manager(s) provides us with a unique ID number (for example via a unique referral link to Hulgrave) which allows us to identify, request and receive, with your authorisation, your financial information from your Wealth Manager(s). ENSURE YOU KEEP YOUR REFERRAL LINK OR OTHER ID NUMBER PRIVATE, AND DO NOT SHARE IT. <p><i>Where we receive your personal information from your wealth advisor/manager or other third party, they will be a separate data controller of your personal information, and will have their own legal bases for processing.</i></p>	<p>Consent</p> <p>More info</p>
<ul style="list-style-type: none"> • Identity • Contact • Account • Financial 	<ul style="list-style-type: none"> • To perform our contract with you, including <ul style="list-style-type: none"> ○ administering your account with us, ○ storing your personal information, ○ providing our Services to you, ○ notifying you of any changes to our Service, and ○ providing information to you which you have requested. 	<p>Contract</p> <p>More info</p>
<ul style="list-style-type: none"> • Identity • Contact • Account 	<ul style="list-style-type: none"> • To manage our relationship with you which will include: <ul style="list-style-type: none"> ○ notifying you about changes to our terms or privacy policy, and ○ asking you to leave a review, provide feedback or take a survey. 	<p>Contract</p> <p>Legal Obligation</p> <p>Our legitimate interests</p> <p>More info</p>
<ul style="list-style-type: none"> • Identity • Contact • Account • Financial 	<ul style="list-style-type: none"> • Manage payments, fees and charges. • Collect and recover money owed to us. 	<p>Contract</p> <p>Our legitimate interests</p> <p>More info</p>
<ul style="list-style-type: none"> • Identity • Contact • Account 	<ul style="list-style-type: none"> • To promote our service to you and keep you updated with information about our services, including: <ul style="list-style-type: none"> ○ delivering relevant content on topics we think may be of interest to you, and ○ letting you know about new functionalities or services. <p>SEE 'OUR PROMOTIONAL UPDATES AND COMMUNICATIONS' TO LEARN MORE</p>	<p>Consent</p> <p>Our legitimate interests</p> <p>More info</p>
<ul style="list-style-type: none"> • Contact • Automatically collected information 	<ul style="list-style-type: none"> • To administer our Platform and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes. • To improve our Platform to ensure that content is presented in the most effective manner for you and for your computer. • To keep our Platform safe and secure. 	<p>Our legitimate interests</p> <p>More info</p>

<ul style="list-style-type: none"> • Automatically collected information 	<ul style="list-style-type: none"> • For measuring or understanding the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you. 	Consent More info
<ul style="list-style-type: none"> • Identity • Account • Financial 	<p>We also anonymise and aggregate Identity, Account and Financial information, and we use aggregated information (such as statistical data or average investment information) to create user-sourced benchmarks that we will feature within the Services, help us develop new products and improve our services.</p> <p>We may provide the aggregated data to Wealth Managers or other third parties in exchange for access to the products or services that they provide, to promote our Services, or to generate other revenue.</p> <p>Where such aggregate information is derived from your personal data we will ensure that your personal data is removed so that you cannot be re-identified from aggregate information retained or used for these purposes.</p> <p><i>While our anonymisation and aggregation of data is based on our legitimate interest in developing and improving our services, you may let us know if you would prefer we do not use your data for this purpose. This will not affect any data which has already been anonymised, but we can stop using your personal data for this purpose going forward. Please contact us at privacidad@fips.es if you would like to ask about your data not being used to inform user-sourced benchmarks and Platform development.</i></p>	Our legitimate interests More info

OUR PROMOTIONAL UPDATES AND COMMUNICATIONS

With your prior **consent** (or where permitted in our **legitimate interest**), we will use your personal information for marketing analysis and to provide you with promotional update communications by email, in-App messaging, website pop-ups or in-App notifications about our services.

You can opt-out of further marketing at any time by selecting the “unsubscribe” link at the end of all our marketing and promotional update communications to you, or by **sending us an email at privacidad@fips.es**.

CHANGE OF PURPOSE

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you would like an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us at privacidad@fips.es. If we process your personal data for any new purpose, we will notify you (via updating this Privacy Policy, and letting you know we have updated it) and we will explain the legal basis which allows us to do so.

LEGAL BASES EXPLAINED

- ✓ **Consent:** We will only request and receive your personal information from Wealth Managers where you have authorised us to do so. We will not share your individual personal data without your authorisation.

We will only process your personal information for promotional or marketing purposes where you have given us your express consent for us to do this, where required by law. For more information, please refer to [Our Promotional Updates and Communication section](#).

You can opt-out of further marketing at any time by selecting the “unsubscribe” link at the end of all our marketing and promotional update communications to you, or by **sending us an email at privacidad@fips.es**.



Contract: We collect, store and process your personal information where it is necessary for performing a contract you have with us (such as our [Terms and Conditions for the Services](#)), or where you have asked us to take specific steps before entering into that contract.



Legal Obligation: We may need to process your personal information to comply with our legal obligations, including under applicable local and EU law, and/or any court orders.

*When processing your personal information in order to **manage our relationship with you**, we ensure that we comply with the General Data Protection Regulation 2016/679 (GDPR) and the Directive on Privacy and Electronic Communications 2002/58/EC, and applicable local laws which implements these rules.*



Legitimate interests: processing your data is necessary for our legitimate interests or the legitimate interests of a third party, provided those interests are not outweighed by your rights and interests.

Our legitimate interests are:

- Performing a contract with our business clients (for example, if we share aggregated portfolio statistics – we will not share your individual personal data without your prior authorisation).
- Enforcing or applying our terms of service or other agreements with you, including recovering fees or other debt due to us.
- Gaining insights on how you use our Platform and Services.
- delivering, developing and improving our Platform and Services, including the effectiveness of our scoring methodology.
- Enabling us to enhance, customise or modify our Platform, service and communications.
- Growing our business and informing our marketing strategy.
- keeping our records updated and studying how customers use our products/services.
- Improving our Platform and data security.
- Providing you with our promotional updates and communications (see [Our Promotional Updates and Communication section](#)), only in certain cases where you have purchased a service from us and have not opted-out at the time of purchase or any time since (you are free to opt-out at any time!).

In each case, these legitimate interests are only valid if they are not outweighed by your rights and interests. If you would like further information about how we assess our legitimate interests, please contact us at privacidad@fips.es.



We also use different types of cookies (including automatically collected information) on our Platform with your **consent** – we explain this in the [Cookies section](#).

WHO WE SHARE YOUR PERSONAL INFORMATION WITH

We may share your personal information with:

- **Our staff**, as part of their job at Hulgrave, only to the extent that they need access to your personal information for the reasons set out in this policy.
- **Any member of the Hulgrave group**, which means our subsidiaries, our ultimate holding company and its subsidiaries, who support our processing of personal information under this policy. If any of these parties are using your information for direct marketing purposes, we will only transfer the information to them for that purpose with your prior consent.
- **Appropriate third parties** including
 - our **business partners, suppliers or sub-contractors** which support the performance of any contract we enter into or other dealings we have in the normal course of business with you (please click [here](#) if you would like more details);
 - our **regulators**, in the event we need to comply with our applicable legal obligations;
 - **analytics and search engine providers** that assist us in the improvement and optimisation of our Platform and subject to the [Cookie section](#) of this policy;
 - our **auditors, legal advisors and other professional advisors**; and
 - **anyone who you give us explicit permission to share it with.**

We will not sell or rent individual personal information to other organisations without your consent.

OTHER DISCLOSURES WE MAY MAKE

We will disclose your personal information to third parties if we buy or sell part of our (or another) business, or if we are required to do so in order to comply with a legal obligation.

(Please click [here](#) if you would like more details)

YOUR RIGHTS

Under data protection law, you have a number of rights in respect of your personal information that we process.

You have the right, under certain circumstances:

- to be **provided with a copy** of your personal information held by us;
- to request the **correction or deletion** of your personal information held by us;
- to request that we **restrict** the processing of your personal information (while we verify or investigate your concerns with this information, for example);

- to **object** to the further processing of your personal information, including the [right to object to marketing](#); and
- to request that your provided personal information **be moved** to a third party.

HOW TO EXERCISE YOUR RIGHTS

If you have any questions or concerns about we handle your personal data or wish to exercise any of your legal rights you can contact us by writing to us at privacidad@fips.es. In particular, where the processing of your personal information by us is based on consent, you have the right to withdraw that consent without detriment at any time.

The Information Commissioner's Office (**ICO**) is the supervisory authority in the UK for data protection issues and can provide further information about your rights and our obligations in relation to your personal information, as well as deal with any complaints that you have about our processing of your personal information (please visit their website at www.ico.org.uk). You may also approach your local data protection authority (see [European Commission: Data Protection - Data Protection Authorities](#)). We would, however, appreciate the chance to deal with your concerns before you approach a supervisory authority so please contact us by writing to us at privacidad@fips.es in the first instance.

WHERE WE STORE YOUR INFORMATION & INTERNATIONAL TRANSFERS

Hulgrave is based in the UK. We only store and process your personal data within the European Economic Area (**EEA**).

If this changes and we process your data outside the EEA, we will take steps to ensure that your data is protected with appropriate safeguards, which may include legally-recognised adequacy mechanisms like the US-EU Privacy Shield. We will always treat your information securely and in accordance with this privacy policy.

HOW WE PROTECT YOUR INFORMATION

All information you provide to us is stored on our servers (which may be supplied by third parties as mentioned [above](#)). Whether you authorise us to access information from your Wealth Manager(s), or you upload your financial information directly to us, our platform uses secure end-to-end encryption to protect your information.

Unfortunately, the transmission of information via the internet is not completely secure. We do our best to protect your personal information, but we cannot guarantee the security of your data transmitted to our Platform; any transmission is at your own risk. Once we have received your information, we use strict procedures and security features to try to prevent unauthorised access.

We recommend using a strong password for your Hulgrave account and making sure you keep your password confidential.

EXTERNAL SITES

Our Platform or Services may, from time to time, contain links to external sites. If you follow a link to any of these websites, please note that these websites have their own privacy policies. Hulgrave does not accept any responsibility or liability for these policies or any content on external sites and does not necessarily endorse the views expressed within them. Hulgrave has no control over the availability of any of these websites. Please check each site's policies before you submit any personal information to these websites.

CHILD SAFETY

Our Platform and services are intended for use only by persons who are at least 18 years old. By using the Platform, you confirm to us that you meet this requirement.

HOW LONG WE KEEP YOUR INFORMATION

Where you have an account with us, we will hold your personal information for so long as you have your account with us in order to meet our contractual obligations to you, and for 6 years after that to identify any issues and resolve any legal proceedings. (We may retain your personal data for a longer period in the event of a complaint, if we reasonably believe there is a prospect of legal proceedings in respect of our relationship with you, or we are aware of pending or ongoing legal proceedings with you.)

In some circumstances, we may keep data longer if applicable law says we have to.

We otherwise process personal information only for so long as is necessary for the purpose(s) for which it was originally collected, after which it will be deleted or archived.

In some circumstances we will anonymise your personal data (so that it can no longer be associated with you and you cannot be re-identified). This anonymised data (for example, aggregated statistics) is no longer personal data, and we may keep and use this anonymised information indefinitely without further notice to you, to help us provide, develop and improve our services.

CHANGES TO THIS POLICY

This policy was last updated on 3 December 2018.

Any changes we make to this policy in the future will be posted on this page. If we make any substantive changes, we will notify you by e-mail or through in-App messaging, website pop-ups or in-App notifications within this page or the Platform.

CONTACT US

We welcome your feedback and questions. If you would like to contact us, please send us an email at privacidad@fips.es.

Alternatively, you can write to us at: Chief Executive Officer of Hulgrave Limited, Unit 202 China Works, Black Prince Rd, SE1 7SJ, London, United Kingdom.

COOKIES

Like most websites and apps, we use cookies to distinguish you (or your device) from other users of our website. Cookies help us provide you with a better browsing experience and help us improve our website.

What are cookies?

Cookies are small amounts of information that are stored on your browser or the hard drive of your device to enable our server to collect certain information from your web browser. Our Platform uses cookies and/or other similar technologies such as device-IDs or in-App codes to collect and store certain information. Cookies in themselves do not identify the individual, but do collect information about your computer, browser, online session, the websites you visit and other information.

Except for essential cookies, all cookies used on our site will expire after 12 months.

We may use the following types of cookies

You can find more information about the individual cookies we use and the purposes for which we use them here:

- **Strictly necessary** cookies. These are cookies that are required for the operation of our Services and under our terms with you (both in order to perform any **contract** with you, and in our **legitimate interests**). They include, for example, cookies that enable you to log into secure areas of our website.

COOKIE TITLE	COOKIE NAME(S)	MORE INFORMATION
Authentication	multiple used	enable users to log in/access their account information securely
Session started	session_started	log outs user out if the browser session is closed for security purposes

- **Analytical/performance** cookies. They allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us, subject to your choices and preferences, to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily.

COOKIE TITLE	COOKIE NAME(S)	MORE INFORMATION

- **Functionality** cookies. These are used to recognise you when you return to our website. This enables us, subject to your choices and preferences, to personalise our content, greet you by name and remember your preferences (for example, your choice of language or region).

COOKIE TITLE	COOKIE NAME(S)	MORE INFORMATION
Language	language	stores the user's language preference

- **Targeting/Advertising** cookies. These cookies record your visit to our website, the pages you have visited and the links you have followed. We will use this information, subject to your choices and preferences, to make our site/app more relevant to your interests. We may also share this information with third parties for this purpose.

COOKIE TITLE	COOKIE NAME(S)	MORE INFORMATION

We may also work with advertising networks that gather information about the content on our site you visit and on information on other websites and services you visit. This may result in you seeing our advertisements when you visit other websites and services of third parties. For more information about how to turn this feature off see below or visit www.youronlinechoices.eu.

Disabling cookies

The effect of disabling cookies depends on which cookies you disable but, in general, the website may not operate properly if all cookies are switched off.

If you want to disable cookies on our website, you need to change your website browser settings to reject cookies. How you can do this will depend on the browser you use.

(Please click [here](#) for details on how to disable cookies)

MORE INFORMATION ON SPECIFIC TOPICS COVERED BY THIS POLICY

TECHNICAL INFORMATION AND INFORMATION ABOUT YOUR VISIT

- **Technical information** may include the Internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform;
- **Information about your visit** may include the full Uniform Resource Locators (URL), clickstream to, through and from our Platform (including date and time), products you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), methods used to browse away from the page, and any phone number used to call our customer service number or social media handle used to connect with our customer service team.

See the [Cookies section](#) for more information on the use of cookies and device identifiers on the Platform.

[Click [here](#) to go back to the section the above information refers to]

MORE DETAILS ON OUR BUSINESS PARTNERS, SUPPLIERS OR SUB-CONTRACTORS WHICH SUPPORT THE PERFORMANCE OF ANY CONTRACT WE ENTER INTO OR OTHER DEALINGS WE HAVE IN THE NORMAL COURSE OF BUSINESS WITH YOU

- Our **service providers**, who process your personal data on our behalf and in accordance with our instructions and the data protection law. This includes: (i) technology providers who support the services we offer to you, for example, by hosting websites, storing data, or providing IT support services; and (ii) companies that help us distribute any communications we send, update marketing lists, facilitate feedback on our services and/or the electronic signing of documents. These organisations (which may include third party suppliers, agents, sub-contractors and/or other companies in our group) will only use your information to the extent necessary to perform their support functions.
- **Business partners** who also provide services to you and are interested in accessing the output of our services (e.g. aggregated and anonymised information, statistics and reports). These business partners act as data controllers, and we will only share your individual personal data with them when you would like us to do so.

[Click [here](#) to go back to the section the above information refers to]

OTHER DISCLOSURES WE MAY MAKE

We will disclose your personal information to third parties if we buy or sell part of our (or another) business, or if we are required to do so in order to comply with a legal obligation:

- In the event that we sell or buy any business or assets, in which case we will disclose your personal information to the prospective seller or buyer of such business or assets subject to the terms of this policy.
- If Hulgrave or substantially all of its assets are acquired by a third party, in which case personal information held by it about its clients will be one of the transferred assets.
- If we are under a duty to disclose or share your personal information in order to comply with any legal obligation, or in order to enforce or apply our terms of service or other agreements with you; or to protect the rights, property, or safety of Hulgrave, our clients, or others. This includes exchanging

information with other companies and organisations for the purposes of fraud protection and credit risk reduction and to prevent cybercrime.

[Click [here](#) to go back to the section the above information refers to]

DISABLING COOKIES

The effect of disabling cookies depends on which cookies you disable but, in general, the website may not operate properly if all cookies are switched off.

If you want to disable cookies on our website, you need to change your website browser settings to reject cookies. How you can do this will depend on the browser you use.

Microsoft Internet Explorer

1. Select the Tools menu > Internet Options
2. Click on the Privacy tab
3. Click on Advanced within the Settings section and select the appropriate setting

Google Chrome

1. Select Settings > Advanced
2. Under Privacy and Security > Content settings.
3. Click Cookies and select the relevant options

Safari

1. Select Preferences > Privacy
2. Click on Remove all Website Data

Mozilla Firefox

1. Choose the Tools menu > Options
2. Click on the Privacy icon
3. Select the Cookie menu and select the relevant options

Opera 6.0 and further

1. Choose Files menu > Preferences
2. Select Privacy

Where you have not set your permissions, we may also separately prompt you regarding our use of cookies on the Site.

[Click [here](#) to go back to the section the above information refers to]