

## **Privacy Policy**

goetzpartners securities Limited (“GPSL”, “us”, “our” or “we”) is a research and advisory house with expertise in corporate, research, and sales. This Privacy Policy (“Privacy Policy”) describes what we learn about you from your visit to our website and how we handle the personal information you provide to us. We collect the minimum amount of data from you to enable us to provide our services, and keep the data for the shortest period possible.

The website [www.goetzsecurities.com](http://www.goetzsecurities.com) (“website”) is owned and operated by GPSL which is a limited company registered in England and Wales No. 04684144. GPSL is authorised and regulated by the Financial Conduct Authority (FRN. 225563). Our registered office address is The Stanley Building, 7 St Pancras Square, London, N1C 4NG, England, UK.

## **Terms of use**

This Privacy Policy and our website Terms and Conditions and Acceptable Use Policy (together with the documents referred to in them) confirm the terms and conditions (“Terms of Use”) on which you may make use of our website. Please read these Terms of Use carefully before you start to use the website.

## **Privacy Policy**

Our foremost concern is to protect your privacy, and we are committed to protecting it. If you have any queries regarding this Privacy Policy or complaints about our use of your information please contact the Compliance Department – Paul W. Dunne on: [paul.dunne@goetzpartners.com](mailto:paul.dunne@goetzpartners.com) and we will deal with your complaint or query as soon as reasonably possible. This Privacy Policy outlines how we collect, process and use personal data about you. Personal data is defined, under Art. 4 (1) as any information relating to an identified or identifiable natural person; an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier.

## **Information which we collect about you**

We may request clients who contact us to provide us with personal information so we can respond to their inquiry. The types of information collected are: name, address and email address, phone number, company and job title.

If you contact us through this website regarding employment opportunities, we may request a copy of your CV or résumé and personal details relating to your employment application. That information will be used for the purpose of assessing your application, and we ensure that its collection and use is in accordance with this Privacy Policy and our obligations under current data protection laws (e.g. The General Data Protection Regulation (“GDPR”) (Regulation (EU) 2016/679)).

Further information on GDPR and the Principles and Rights can be obtained from the **[UK Information Commissioners website](#)**.

## **Cookies**

We use “cookies” and other types of tracking software in order to personalise your visit to our website, customise our pages for you and enhance your experience by gaining a better understanding of your particular interests. A cookie is a message given to a web browser by a web server, which is then stored by the browser in a text file. Each time the browser requests a page from the server this message is sent back which enables the user to be identified.

We use the information provided by cookies to recognise and track which parts of our website you visit when you are using our website, analyse trends and general usage patterns, optimise our site,

administer the site, or for research and marketing purposes to help us better serve you. No information which personally identifies you will be collected through the cookies.

If you wish, you can set your browser to notify you before you receive a cookie so you have the chance to accept it and you can also set your browser to refuse to receive or send all cookies. You can also block cookies by activating the setting on your browser which allows you to refuse the setting of all or some cookies. However, please be aware that certain features of our website require the use of cookies in order to work effectively and if you do not accept cookies these features may not function correctly or at all.

If you continue to use our site, you agree to our use of cookies.

### **Google Analytics**

One of the tools used is Google Analytics, a web analytics service provided by Google, Inc. (1600 Amphitheatre Parkway Mountain View, CA 94043, USA, hereinafter referred to as "Google").

Google Analytics uses the "cookies" mentioned above in the Cookie section. Your browser transmits the information created with the help of these cookies on your use of this website to Google servers in the USA, where they are stored for up to 14 months. Currently there is no decision of the EU Commission that the USA generally provide an adequate level of protection for personal data. Google undertakes, however, to comply with the EU-US Privacy Shield Framework as set forth by the US Department of Commerce regarding the collection, use and retention of personal information from European Union member countries. More information in this regard is available here: <https://support.google.com/analytics/answer/7105316?hl=en>

More information on the handling of user data within Google Analytics is available in Google's privacy notice at <https://support.google.com/analytics/answer/6004245?hl=en>

You can prevent the collection and the transmission to Google of data regarding your website use (incl. your IP address) as well as Google's processing of such data by downloading and installing the browser plugin available here: <https://tools.google.com/dlpage/gaoptout?hl=en>

### **Matomo (formerly Piwik)**

Another web analytics tool that goetzpartners uses is the software "Matomo" (formerly "Piwik").

### **IP addresses**

Our website logs your IP address anonymously, i.e. with at least the last two blocks of numbers deleted, and other information about your computer for administrative and security reasons and to collate statistical (non-personal) information about the use of our website.

We do not gather any more information about you without your knowledge and active participation and permission than as is set out in this Privacy Policy.

What we do with your information

We use the information we collect from you:

- to evaluate, analyse and improve our business;
- to assess trends and usage of this website;
- to help us better serve you and our clients;
- to bring other products and services of interest to your attention;

Updated on 17<sup>th</sup> January 2019

- where applicable, to verify your information with employers or other referees;
- to comply with relevant laws and regulations.

We also collect and analyse information from other sources for the same purposes.

### **Who we may share the information with**

We obtain client consent before we:

- offer clients other products and services;
- send clients information about products and services through direct marketing. We will keep you informed of any activities undertaken by us which we believe may be of interest to you and this use may include e-mail from time to time if you have provided your consent to this. If at any time you wish to opt out of receiving such direct marketing materials, you can do so by contacting our Compliance Department - Paul W. Dunne on [paul.dunne@goetzpartners.com](mailto:paul.dunne@goetzpartners.com) ;
- share information about clients with our service providers or offer it to parties outside goetzpartners;
- disclose to other persons information about our clients unless we must disclose information for legal reasons. We may be required to release information by a court of law, or other legal or regulatory authorities or agencies. If so, our guideline is to release information only to the extent required and to ensure that the relevant governmental or regulatory agency has invoked the appropriate authority, forcing us to release information we have about the client.

### **Transfers outside the EEA**

Except as set out above, we will not share information about clients with anyone outside the goetzpartners, and no information will be transferred to a recipient outside of the European Economic Area ("EEA").

### **Legal Basis for Collection and Processing**

We collect, process and use your personal data relating to website usage based on our legitimate interests. Where you contact us to receive certain information, we collect your personal data to respond to your request.

### **How you can request access to your information**

In accordance with your rights under GDPR, you may request the amendment of the personal information we hold. Clients may have access to their own contact information (i.e. legal entity names and addresses, phone and fax numbers, email addresses, physical and registered addresses, contact names, etc.). Clients may check their information for verifications, updates, corrections and to delete obsolete information. You also have the right to erasure ('Right to be forgotten'), the right to have the processing restricted and the right to data portability.

If you wish to obtain a copy of this information, update or correct your details or remove your personal data from our records, please contact our Compliance Department on - Paul W. Dunne on [paul.dunne@goetzpartners.com](mailto:paul.dunne@goetzpartners.com) enclosing your postal details.

You may also contact the data protection authority in case you have any complaints, questions or concerns about how we process your personal data. If you don't know who the competent data protection authority for your concerns is, please contact us at [paul.dunne@goetzpartners.com](mailto:paul.dunne@goetzpartners.com).

## **Security**

We recognise the need to ensure that personal information gathered via this website remains secure. Our website has security measures in place to protect against the loss, misuse and alteration of the personal information under our control. We protect our clients' privacy by:

- keeping client information and the business they do with us in the strictest confidence;
- controlling how we obtain, use and give out account information about our clients;
- respecting our clients' privacy when marketing our products and services; and
- taking steps to adhere to our obligations and to protect our clients' rights under data protection laws.

We take steps to protect our client's information from error, loss and unauthorised access. Members of staff with access to client information are aware of the measures inherent in maintaining confidentiality. Each staff member signs an agreement stating that they are aware of their duties and responsibilities under GDPR and that maintaining confidentiality is a contractual condition of employment. GPSL staff are also required to adhere to strict internet privacy standards established by our senior management. Our technology department act to ensure security measures are in place to protect client information at all times; whether stored in data files or utilised by our staff. GPSL adheres to industry standards in relation to security measures for protecting personal and client details.

## **Retention of information**

We will only hold the minimum personal information necessary and for the minimum amount of time. We will only keep any information on record for the time period specified by law.

## **Updates to Privacy Policy**

We may update this Privacy Policy at any time without notice. Any changes will be notified to you using the email address you have given us or by an announcement on this website. Your continued use of this website following the posting of changes to this Privacy Policy will mean you accept these changes.

## **Why not tell us what you think?**

We are committed to ensuring a high quality of service to our clients. We welcome any comments or concerns about our privacy guidelines, and we are committed to working with you in achieving a successful resolution.

If you have any questions relating to this policy, then please contact our Compliance Officer:

Paul Dunne | Compliance Officer

goetzpartners securities Limited.

The Stanley Building, 7 Pancras Square, London, N1C 4AG, England, UK.

T +44-203-859-7727 | [paul.dunne@goetzpartners.com](mailto:paul.dunne@goetzpartners.com)

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