

## Privacy and Cookies Policy

### What is this policy?

We are committed to protecting the privacy and security of your personal information. This privacy policy describes how Rosecut Technologies Ltd and our group and associated companies collect, use and share the personal information you provide to us and which we collect in the course of operating our businesses, websites and mobile applications. We may revise this policy at any time by amending this page. Please keep an eye on this page to take note of any changes.

### What personal information do we collect?

Personal information is any information in our possession or control that can be used to directly identify an individual or that we can link to an individual. We collect and process the following personal information about you:

### Information you give us

You give us personal information when you communicate with us through various means as follows:

- **When we provide you with services** – If you are our client, you will provide us with personal information in connection with our client on-boarding and monitoring processes and the services we provide to you. Similarly, if you are our client's authorised representative, you will provide us with personal information in this regard.
- **Where you are a prospective client** – If we are exploring the possibility of providing services to you, you may provide us with personal information in connection with our discussions and client on-boarding processes.



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- **When we do business with you** – If you are our appointed representative, a counter party or a party we otherwise do business with, you will provide us with personal information in connection with our business relationship.
- **Subscribing via our website** – If you sign up with us to receive further information regarding our services or marketing communications, you will provide us with personal information to allow us to contact you with these.
- **Recruitment applications** – If you apply for a job with us, you will provide us with personal information in connection with your application.
- **Marketing our services** – If you attend networking or other marketing events either hosted or attended by us, you may provide us with personal information to allow us to contact you.

## Information we collect via technology

We collect technical personal information about you when we correspond with you or interact with you through various means such as our websites and mobile applications. For example, we will automatically collect the following information when you visit our websites and use our mobile applications: technical information, such as the type of browser you use and the Internet protocol (IP) address used to connect your computer or mobile device to the Internet (as applicable); and information about your visit, including the full Uniform Resource Locators (URL), clickstream to, through and from our site (including date and time), traffic data and other communication data, the resources that you access and information derived from the cookies we place on your mobile device and computer.



Rosecut Technologies Ltd is an Appointed Representative of Dolfín Financial (UK) Ltd which is authorised and regulated by the Financial Conduct Authority in the UK, FRN 552894. Dolfín is registered in England and Wales. Register number 07431519, authorised and regulated by the Financial Conduct Authority.

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2 Portman St, Marylebone

W1H 6DU, London

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## Information we receive from third parties

We receive personal information about you from third parties as follows:

- **If you are our client** – We may receive personal information about you which is relevant to our client on-boarding and monitoring processes and the services we provide to you from third party sources such as your professional advisers (for example, your investment adviser) or third party service providers who assist with our “know your client” checks.
- **If you are our prospective client** – We may receive personal information about you which is relevant to the provision of our services and our client on-boarding processes from publicly available open sources.
- If you are our **appointed representative**, a counter party or a party we otherwise do business with – We may receive personal information about you from third party service providers who assist with “know your client” checks.
- **If you have applied for a job with us** - We may receive personal information about you relevant to the job you have applied for, from background check providers or employment agencies

## How do we use your information?

We may use the personal information we hold about you for the following purposes:

- To provide you with services, act as your FCA authorised principal or otherwise conduct business with you.
- To send you the marketing material you have requested to receive via our websites and to manage and track our marketing efforts.
- To process your application for a job with us.



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- To comply with our legal and regulatory obligations.
- To establish, defend or exercise our legal rights or in connection with legal proceedings.
- To improve on our services, websites and mobile applications or create new ones.

We rely on the following legal grounds to process your information:

- **Contract performance** – We may collect and use your personal information in order to enter into a contract with you or perform a contract with you.
- **Compliance with law or regulation** – We may collect and use your personal information in order to comply with law and regulation.
- **Legitimate business interests** – We may collect and use your personal information in order to further our legitimate business interests such as promoting and improving our services, websites and mobile applications or creating new ones.
- **Consent** – We may, although usually do not, collect and use your personal information with your consent. If we need your consent, we will contact you separately about it and you are free to withdraw your consent at any time by contacting us as set out below.

## Who will we disclose your information to?

We may share your personal information within our group and with our associated companies where necessary. In addition, we may disclose your information to the following third parties:



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- Third parties relevant to the services we provide or business we conduct with you. For example, if you are our client we may share personal information about you with your investment adviser or any account representative you appoint to manage your account with us.
- Third party service providers, bound by a duty of confidentiality, engaged by us to help us run our business. For example, brokerage firms engaged by us to facilitate deals in securities on behalf of our clients.
- Regulatory authorities (such as the Financial Conduct Authority) and HM Revenue and Customs, should they require such disclosure on legal grounds.
- If we or our group, or substantially all of our or our group's assets are acquired by a third party, we will disclose your information to the buyer on a confidential basis (as information about our clients will be one of the assets transferred to the buyer).

## How long will we keep your information for?

We will only hold your information for as long as necessary. How long we hold your personal information for will vary and depends on:

- The purpose for which we have your personal information – We need to keep your personal information for as long as necessary to fulfil the purpose.
- Legal or regulatory obligations – We need to keep certain personal information for minimum periods set out in law or regulation.

We have appropriate security measures in place to keep your personal information secure whilst we hold it.



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## Will we transfer your information outside of the European Economic Area?

We may be required to transfer your information to destinations outside the European Economic Area. When we make such transfers, we will ensure they are compliant with applicable data protection law.

## What are your rights?

You have a number of rights in relation to how we use your personal information (but please note in some circumstances these rights may not be available to you and we will address this with you on a case by case basis). If you'd like to exercise these rights, please contact us using the contact details listed below under "Who can you speak to at Rosecut about this policy?".

- Right of access – You have the right to know if and how we are using your personal information and obtain a copy of it.
- Right of rectification – You have the right to require us to rectify any errors in the personal information we hold about you.
- Right to erasure – You have the right to require us to delete your personal information if our continued use of it is not justified.
- Right to restrict processing – In some circumstances, where you may not be entitled to require us to erase your personal information, you may be entitled to limit the purposes for which we can use your information.
- Right of data portability – You have the right to require us to provide you with a copy of the personal information you have provided to us in a commonly used machine-readable format or to transfer it in that form to a third party.
- Right to withdraw your consent to processing – You have the right to withdraw the consent you have given us to allow us to process your personal information.



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In addition, you are able to lodge a complaint with a data protection authority if you think we have infringed any of your rights. For more information on this please contact your local data protection authority. A list of data protection authorities throughout the European Economic Area and beyond can be found [here](#).

## Who can you speak to at Rosecut about this policy?

Questions, comments and the exercise of your rights regarding this policy and your personal information are welcomed and should be addressed to the Data Protection Team by email at [contact@rosecut.com](mailto:contact@rosecut.com) or by post at Rosecut Technologies Ltd, 2 Portman Street, London, W1H 6DU.

## Rosecut Cookie Policy

### What is this policy?

Our website uses cookies. This policy explains what cookies we use and why we use them. By using our website you consent to our use of cookies in accordance with this policy.

### What are cookies and why do we use them?

Cookies are text files containing small amounts of information which are downloaded to your device when you visit a website. Cookies are useful because they allow a website to recognise a user's device. You can find more information about cookies at: [www.allaboutcookies.org](http://www.allaboutcookies.org) and [www.youronlinechoices.eu](http://www.youronlinechoices.eu).

We use cookies to ensure you can use our website and to improve your user experience.



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## What types of cookies do we use?

We use the following cookies:

- **Strictly necessary cookies:** These are cookies that are essential for the operation of our website. They allow you to move around and use the features of our website (including accessing its secure areas). Without these cookies, we cannot make our website available to you.
- **Analytical/performance cookies:** These are cookies which allow us to collect information about how visitors use our website, for instance which areas visitors go to most often, and if they get error messages from particular pages. This helps us to improve the way our website works, for example, by ensuring that visitors are finding what they are looking for easily. Without these cookies, we cannot make improvements that could better your user experience.
- **Third party cookies –** These are cookies which our website also allows third parties to download to your device. For example, cookies from sharethis.com are used to allow you to send a page from our website to your social media account such as Facebook or Twitter. Cookies from Vimeo are also used. The Vimeo cookie is set on pages that contain Vimeo videos. These third party cookies are not under our control. For further information about their use see [www.sharethis.com](http://www.sharethis.com) and [www.vimeo.com](http://www.vimeo.com).

The cookies we use will not collect information that identifies you. The cookies we place on your mobile device will only stay there for the duration of your visit to our website and expire when you close it.

## Can you block cookies?

Most mobile devices automatically accept cookies. However, if you prefer, you can change your device settings to prevent automatic acceptance or to notify you each time a cookie is set so that you may accept or reject cookies on a case by case basis. Please note, if you block cookies you may not be able to access all or part of our website.



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## Contact information

If you have any questions about this policy please contact the Data Protection Team by email at [contact@rosecut.com](mailto:contact@rosecut.com) or by post at Rosecut Technologies Ltd, 2 Portman Street, London, W1H 6DU.



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