



STONEHAGE
FLEMING

THE INTERNATIONAL FAMILY OFFICE

Strictly Private & Confidential

STONEHAGE FLEMING LAW

LEGAL NOTICES

NOVEMBER 2015

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CONTENTS

1	PRIVACY POLICY	3
1.1	Information we may collect from you:	3
1.2	Uses made of information collected.....	3
1.3	Disclosure of your information.....	4
1.4	Where we store your personal data.....	5
1.5	Consent to processing.....	5
1.6	Your rights	5
1.7	Access to information.....	6
1.8	Changes to our privacy policy	6
2	COOKIE POLICY	6
2.1	Strictly necessary cookies.....	6
2.2	Performance Or Analytical Cookies	7
2.3	Managing And Blocking Cookies	7
3	ACCEPTABLE USE POLICY	7
3.1	Prohibited uses of our site.....	7
3.2	Suspension & Termination.....	8
3.3	Changes to the Acceptable Use policy	9
4	ACCESSIBILITY POLICY	9
5	ANTI-MONEY LAUNDERING POLICY.....	9
6	ANTI-BRIBERY & CORRUPTION POLICY.....	9
7	EQUALITY & DIVERSITY POLICY	10



1 PRIVACY POLICY

Stonehage Fleming Law Limited (“SFL”) is committed to protecting and respecting your privacy. SFL’s firm details can be found on the Legal Statements section on this site.

This policy (together with our terms of use-contained on the Legal Statements section of this site) sets out the basis on which any personal data SFL collects from you, or that you provide to us, will be processed and used by SFL. Please read the following carefully to ensure you understand our views and practises regarding your personal data and how we will treat it. By visiting www.stonehagefleminglaw.com (“our site”) you are accepting and consenting to the practice described in this policy.

This policy covers without limitation, the home page, splash page and all other pages under the domain name of our site and all content contained on those pages.

For the purposes of the Data Protection Act 1998 (the “Law”) the data controller is Stonehage Fleming Law Limited.

1.1 Information we may collect from you:

1.1.1 [Information you may give us.](#) You may give us information about you by filling in forms on our site or by corresponding with us via phone, email, facsimile or otherwise. This includes information you provide when you report an issue with our site. The information you give us may include your name, email address and phone number;

1.1.2 [Information we collect about you.](#) Each time you visit our site we may automatically collect the following:

1.1.2.1 technical information including the internet protocol (IP) address used to connect your computer to the internet, your log-in information, browser type and version, browser plug-in types and versions, time-zone setting, operating system and platform; and

1.1.2.2 information about your visit, including the Uniform Resource Locators (URL) clickstream to, through and from our site (including date and time); items you searched for; page response times; download errors, length of time spent on pages, page interaction information (such as scrolling, clicks and mouse-overs) and methods used to browse away from the page and any phone number used to call us.

1.1.3 [Information we receive from other sources.](#) We may receive information about you from third parties we work with (including for example analytic providers, search information providers, sub-contractors in technical services).

1.2 Uses made of information collected

SFL uses information held about you in the following ways:



1.2.1 [Information you give to us.](#) We will use this information:

1.2.1.1 to carry out our obligations arising from any contracts entered into between you and SFL and to provide you with the information, products and services that you request from us;

1.2.1.2 to provide you with information about other products and services that we offer that are similar to those that you have already purchase or enquired about;

1.2.1.3 to provide you with information about products or services we fell may interest you. If you are an existing customer, we will only contact you by electronic means with information about products and services similar to those which were the subject of prior dealings between us. If you are a new client, and where we permit selected third parties to use your data, we (or they) will contact you by electronic means only if you have consented to do this. If you do not want us to use your data in this way, or to pass your details on to third parties for marketing purposes, please tick the relevant 'opt out' box on the form on which we collect your data;

1.2.1.4 to notify you about changes to our service; and

1.2.1.5 to ensure that content from our site is presented in the most effective manner for you and for your computer.

1.2.2 [Information we collect about you.](#) We will use this information:

1.2.2.1 to administer our site and for internal operations including troubleshooting, data analysis, testing, research, statistical and survey purposes;

1.2.2.2 to improve our site and to ensure that content is presented in the most effective manner for you and your computer;

1.2.2.3 to allow you to participate in interactive features of our service, when you choose to do so; and

1.2.2.4 as part of our efforts to keep our site safe and secure.

1.2.3 [Information we receive from other sources.](#) SFL may combine this information with information you give to us and information we collect about you. SFL may use this information and combined information for the purposes set out above (depending on the types of information we receive).

1.3 Disclosure of your information

SFL may share your information with selected third-parties including:

1.3.1 suppliers and sub-contractors for the performance of any contract SFL enters into with them or you; and



- 1.3.2 analytics and search engine providers that assist us in the improvement and optimisation of our site.

SFL may disclose your personal information to third parties:

- 1.3.3 in the event that we buy or sell any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets; and
- 1.3.4 if we are under a duty to disclose or share your personal data in order to comply with any legal obligation, where requested by regulatory agencies, or in order to enforce or apply our terms of use and other agreements or to protect rights, property or safety of SFL. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

1.4 Where we store your personal data

The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area (EEA). It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. Such staff may be engaged in, amongst other things, the provision of support services. By submitting your personal data you agree to this transfer, storage or processing. SFL will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this policy.

All information you provide to us is stored on secure servers.

We must advise you that the transmission of information via the internet is not completely secure. While we will do our utmost to protect your personal data we cannot guarantee the security of data transmitted to our site, any transmission is made at your own risk. Once SFL has received your information it will use strict procedures and security features to try and prevent unauthorised access.

1.5 Consent to processing

By providing any personal information to our site you fully understand and unambiguously consent to the transfer of such personal information to, and the collection and processing of such personal information in the United Kingdom, Guernsey, Jersey, South Africa and other countries and/or territories.

1.6 Your rights

You have the right to ask SFL not to process your data for marketing purposes. SFL will usually inform you (before collecting your data) if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes. You can exercise your right to prevent such processing by checking the opt-out boxes on the forms we used to collect your data or by contacting us at enquiries@stonehagefleminglaw.com at any time.



1.7 Access to information

The Law gives you the right to access information held about you and to have it corrected or deleted. Any access request may be subject to a reasonable fee to cover the cost of providing you with details of the information we hold about you.

1.8 Changes to our privacy policy

Any changes to our privacy policy in the future will be posted on this page. Please check back from time to time to see if this policy has changed.

2 COOKIE POLICY

Our website (“site”) uses cookies to distinguish you from other users of our site. A cookie is a small file of letters and numbers that a website can store on the browser or hard drive of your computer if you agree. These cookies allow our site to identify you on subsequent visits to our site and for example, remember to log you in on that next visit.

By continuing to browse our site, you are agreeing to our use of cookies.

Cookies may be required to allow you to access and participate in certain areas of our site. The cookies we store on your computer do not contain any personally identifiable information.

There are different types of cookies used for different purposes. The cookies our site uses are listed below under the cookie categories recommended by the International Chamber of Commerce.

2.1 Strictly necessary cookies

These are cookies that are required for the operation of our site. They include, for example cookies that enable you to log into secure areas of our website or to fulfil an action requested by you when you are logged on.

We use **strictly necessary cookies** in the following ways:

COOKIE	NAME	PURPOSE	MORE INFORMATION
Cookie acceptance	cookieacceptance	Used to remember whether you are happy to accept cookies.	
Session cookie	JSESSIONID	Used to remember your session information.	
Cookie acceptance	cookieacceptance	Used to remember whether you are happy to accept cookies.	
Session cookie	JSESSIONID	Used to remember your session information.	



2.2 Performance Or Analytical Cookies

These cookies allow us to improve our website by recognising and counting the number of visitors to our site and to see how visitors move around our site while they are using it. These analytics will help us improve the way our website works, for example by letting us know how we need to adapt our site to ensure users can easily find what they are looking for.

We use **performance/analytical cookies** in the following way:

COOKIE	NAME	PURPOSE	MORE INFORMATION
Google Analytics	_utma _utmb _utmc _utmz	These cookies are used to collect information about how visitors use our site. We use the information to compile reports and to help us improve the site. The cookies collect information in an anonymous form, including the number of visitors to the site, where visitors have come to the site from and the pages they visited.	Google's privacy policy

2.3 Managing And Blocking Cookies

If you want to remove any cookies already set, you can do so from your browser. You can find out how to do this by going to the help menu in your browser.

You can also block cookies from your browser. However if you use your browser settings to block *all* cookies (including essential cookies) you may not be able to access all or parts of our site.

Except for essential cookies, all cookies will expire after seven days.

For further information about how to control and disable cookies in your browser please visit: www.aboutcookies

3 ACCEPTABLE USE POLICY

This acceptable use policy sets out the terms between you and SFL under which you may access our site. This acceptable use policy applies to all users of, and visitors to, our site. Your use of our site means that you accept, and agree to abide by, all the policies in this acceptable use policy, which supplement our terms of use (contained on the Legal Statements section of this site). Please read our terms of use before continuing to use our site.

Our site is a site operated by SFL. SFL's firm details can be found on the Legal Statements section on this site.

3.1 Prohibited uses of our site

You may only use our site for lawful purposes. You may *not* use our site:



- 3.1.1 in any way that breaches any applicable local, national or international law or regulation;
- 3.1.2 in any way that is unlawful or fraudulent, or has any unlawful or fraudulent purpose or effect;
- 3.1.3 to send, knowingly receive, upload, download, use or re-use any material which does not comply with our content standards;
- 3.1.4 to transmit, or procure the sending of, any unsolicited or unauthorised advertising or promotional material or any other form of similar solicitation (spam); and/or
- 3.1.5 to knowingly transmit any data, send or upload any material that contains viruses, Trojan horses, worms, time-bombs, keystroke loggers, spyware, adware or any other harmful programs or similar computer code designed to adversely affect the operation of any computer software or hardware.

You also agree:

- 3.1.6 not to reproduce, duplicate, copy or re-sell any part of our site in contravention of the provisions of our terms of use; and
- 3.1.7 not to access without authority, interfere with, damage or disrupt:
 - 3.1.7.1 any part of our site;
 - 3.1.7.2 any equipment or network on which our site is stored;
 - 3.1.7.3 any software used in the provision of our site; and/or
 - 3.1.7.4 any equipment or network or software owned or used by any third party.

3.2 Suspension & Termination

SFL will determine, at our discretion, whether there has been a breach of this acceptable use policy through your use of our site. When a breach of this policy has occurred, we may take such action as we deem appropriate.

Failure to comply with this acceptable use policy constitutes a material breach of the terms of use upon which you are permitted to use this site, and may result in SFL taking all or any of the following actions:

- 3.2.1 immediate, temporary or permanent withdrawal of your right to use our site;
- 3.2.2 issue of a warning to you;
- 3.2.3 legal proceedings against you for reimbursement of all costs on an indemnity basis (including but not limited to, reasonable administrative and legal costs) resulting from the breach;
- 3.2.4 further legal action against you; and/or



3.2.5 disclosure of such information to law enforcement authorities as we reasonably feel is necessary.

SFL excludes liability for actions taken in response to breaches of this acceptable use policy. The responses described in this policy are not limited, and we may take other action we reasonably deem appropriate.

3.3 Changes to the Acceptable Use policy

SFL may revise this policy at any time by amending this page. You are expected to check this page from time to time to take notice of any changes we make, as they are legally binding on you. Some of the provisions contained in this policy may also be superseded by provisions or notices published elsewhere on our site.

4 ACCESSIBILITY POLICY

We are committed to ensuring that our website conforms to the World Wide Web Consortium (W3C) Web Content Accessibility Guidelines (WCAG) 2.0 Level AAA requirements to the maximum extent possible. However, the changing nature of our website may not comply with all Level AAA accessibility features.

For enquiries or comments, please email us at enquiries@stonehagefleminglaw.com. We will try our best to provide the information in a format accessible to you and ensure your experience on our website is as comfortable as humanly possible.

5 ANTI-MONEY LAUNDERING POLICY

SFL's anti-money laundering (AML) policies are generally based on the highest standards that are required. SFL conducts client due diligence enquiries on each new client and persons connected with them and conducts ongoing monitoring of existing clients. Where necessary for these purposes, we seek relevant information from third party data suppliers. Where individuals have supplied personal data for this purpose we will only use it for that purpose and will keep it only as long as the relevant AML and data protection legislation requires.

SFL also has internal procedures to ensure that any suspicions of money laundering are reported to the appropriate authorities where there is an obligation to do so. Lawyers and other staff are provided with training on these issues.

6 ANTI-BRIBERY & CORRUPTION POLICY

SFL is committed to ethical business practices and has a zero tolerance policy in respect of improper nor criminal behaviour. SFL carries out business in an honest and transparent way with integrity and does not tolerate bribery or corruption. It is SFL's policy to comply fully with the UK Bribery Act 2010 and all other applicable anti-corruption laws when conducting any type of business anywhere in the world. SFL requires those with whom we have business relationships to have and maintain a like policy and appropriate procedures for combatting bribery and corruption.



7 EQUALITY & DIVERSITY POLICY

SFL is an equal opportunities employer and recognises the benefit of having a diverse workforce from all backgrounds and with differing views and experiences. SFL believes that a diverse culture enhances our ability to provide quality service to our clients. A culture of fairness underpins our recruitment practise and guides the firm's policies in relation to the development and retention of those who work here. If you require a copy of our Equality & Diversity policy please contact us on enquiries@stonehagefleminglaw.com

