

# AXA INVESTMENT MANAGERS

## Privacy Policy

AXA Investment Managers make this statement in the light of the requirements of the Data Protection Act 1998 ("the Act") in order to alert clients, employees and contacts to AXA Investment Managers data processing practices which will govern the processing of any personal data as defined under the Act.

If you have any query about this statement, please contact us.

A list of the AXA Investment Managers companies, associates and subsidiaries is available upon request.

### Privacy statement in summary

AXA Investment Managers may use your personal information together with other information for the purposes of employment (staff members, former staff members and applicants for employment only) providing financial services, marketing, administration, and training, and we may disclose your information to our service providers and agents for these purposes.

We may also keep your information for a reasonable period for marketing purposes in order to contact you about our services, but you can choose not to receive such marketing material at any time.

Occasionally the marketing material may concern the provision of services by third parties; for example where AXA Investment Managers staff are speaking at a conference organised by someone else.

AXA Investment Managers also performs some processing of personal data including voice recording of telephone calls and e-mail communications for purposes which are required by law (eg. anti-money laundering initiatives) and for certain commercial and regulatory purposes (e.g. fitness & propriety and related creditworthiness checks on data subjects connected with recruitment) the granting of product agencies (eg. IFA appointments) training and employment.

### Privacy statement in detail

To help us make decisions about clients and staff, to prevent fraud, to check the identity of new clients to reduce financial crime and to prevent money laundering, we may where necessary and appropriate, search the files of authorised criminal record bureaux and credit reference agencies who may record any credit searches on your file. That information may be used by other credit grantors for making credit decisions about you and the people with whom you are financially associated, for prevention of fraud, the reduction of crime and money laundering, and occasionally for tracing debtors.

For the protection of all our clients we operate a strict anti-crime and anti-money laundering reporting procedure. We may, in certain circumstances, disclose information to the appropriate and proper authorities to facilitate the reduction of crime, the recovery of monies

and/or other assets constituting the proceeds of crime as defined by the Proceeds of Crime Act 2002 ("POCA") legislation and to comply with ancillary regulations in relation to suspected money laundering or other criminal activity.

Note that the checks outlined in the above paragraph normally apply only where a client is investing with AXA Investment Managers in an individual capacity, as a partner in a business, or where the individual concerned is a senior officer in a company connected with our investment management business or investment product for which AXA Investment Managers is responsible.

For marketing purposes AXA Investment Managers may share your information with organisations who are our business partners or our agents. We or they may contact you by mail, telephone, fax, e-mail or other alternative medium to let you know about any service, event, or seminar which may be of interest to you.

If you do not wish to receive such information from us or our business partners, please contact our data protection officer at any time. No further action is necessary if you have previously indicated to us that you do not want to receive any such marketing material.

For the purposes of discharging its regulatory obligations pursuant to the Financial Services and Markets Act 2000 and for the purpose of monitoring or keeping a record of communications which are relevant to AXA Investment Managers business (including quality control and training requirements), AXA Investment Managers may record communications on its telephone and other electronic communication networks. This will be consistent with its internal written policy on voice recording, respect for privacy in accordance with Human Rights legislation, DPA Principles, POCA, and related anti-crime obligations permitted by the Lawful Business Practice Regulations and permitted exemptions under the Regulation of Investigatory Powers Act 2000 where relevant.

In some cases, AXA Investment Managers, having first obtained your explicit consent, may need to process "sensitive personal data", such as medical, religious or special dietary requirements or in connection with staff disability and other requirements for reasons of compliance with employment, equal opportunities and health and safety legislation. If you are a client or employee of AXA Investment Managers and have explicitly consented to the processing of sensitive personal data by AXA Investment Managers, your present relationship with us demonstrates your continuing consent to this processing, to the extent applicable to you.

Sometimes we may need to transfer your personal information to countries which do not provide the same level of data protection as the UK. If we do have a need to make such a transfer then we will put a contract in place to ensure that your information is adequately protected and your privacy respected.

When you give us information about another individual for business purposes, you do so on the basis that that other individual has agreed, and has explicitly consented to the processing of his or her personal data, including sensitive personal data by AXA Investment Managers and its agents, and to the transfer of his or her information abroad and to your receiving on his or her behalf any protection notices that may be applicable.

You are entitled to ask for a copy of any personal information processed by AXA Investment Managers (for which we may charge a small fee) and to correct any inaccuracies relating to

personal data concerning you which we hold or otherwise control for the purpose of processing as defined under the Act.

## **Personal data protection and cookies – Use of cookies by AXA Investment Managers**

This website uses cookies to collect certain anonymous information when you visit our website (such as to measure and analyse information with respect to visits to our website, and use of our social media sharing tool). By pursuing your navigation on the website, you accept the use and installation of these cookies. We allow third-party companies, including LinkedIn, AddThis and Google Analytics, to collect certain anonymous information when you visit our website. This non personally identifiable information is stored for up to 5 years before deletion. We use this information to increase the efficiency of our website. To that effect we use your IP-address and possibly other comparable numbers which are exchanged between computers during regular internet use; these can, with additional information, sometimes be used to identify a natural person. However, we do not do this. This information is used to collect, among others, traffic data and data regarding your browser type and computer. These companies may use this information during your visits to this and other websites in order to provide advertisements about similar goods and services likely to be of greater interest to you. These companies typically use a cookie or a third party web beacon to collect this information. To learn more about this behavioural advertising practice, you can visit <http://www.youronlinechoices.eu>.

You may block the registration of cookies by setting your browser in the following manner:

### **Mozilla Firefox 54.0 and above**

- Click on Tool menu, Options, Privacy; in Track, click on “manage the do not track Setting”. Do not check this box
- Search Cookie and choose your option

### **Microsoft Internet Explorer 11.0 and above**

- Click on Tool icon then Internet Options: advanced options/ Security/ uncheck “Do Not Track” request
- Click on tool icon, internet options/ Confidentiality: Select appropriate level

### **Google Chrome 59.0 and above**

- Click on Tool/ settings/ advanced/ Privacy and Security, un-check “Send do not track request”
- Click on Tool/ settings/ advanced, click on Content settings/ Cookies: “Allow sites to save and read cookie data

### **Safari 4.0 and above**

- Click on Tool then Preferences
- Go to the tab Security

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