

PRIVACY POLICY

The ScotGems plc website (www.scotgems.com) is operated by First State Investments (UK) Limited on behalf of ScotGems plc.

This policy gives information on how we process personal information we hold about you. Personal information is information or opinion that allows others to identify you. It includes your name, age, gender, contact details as well as your health and financial information. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it. By visiting www.scotgems.com you are accepting and consenting to the practices described in this policy.

For the purposes of the Data Protection Act 1998 (the "Act"), the data controller is ScotGems Plc. ("**we**", "**us**")

We will act to protect your personal information in accordance with local law and this policy statement.

The privacy of your personal data is important to us. The Act defines personal data as data "which relate to a living individual who can be identified:

- (a) from those data; or
- (b) from those data and other information which is in the possession of, or is likely to come into the possession of the data controller

and includes any expression of opinion about the individual and any indication of the intentions of the data controller or any other person in respect of the individual".

The following statement outlines our general information handling practices.

What personal data do we collect?

We collect personal data which you provide to us via application forms you complete on our website (if applicable), or by corresponding with us by phone, fax, email and through our on-line functions. Personal data collected may include:

Name
Job Title
Company
Contact details

How is your personal data used?

The main purpose for us collecting your data is to provide you with information about ScotGems plc, for prudential and risk management purposes and to provide you with any

products and services that you request from us. If you would like to receive further information from us about other products or services offered by us or any of our affiliated companies, please e-mail us at info@stewartinvestors.com. We collect personal information to provide you with the products and services you request as well as information on other products and services offered by or through us.

The law may also require us to collect personal information in certain circumstances. We will tell you who collects the personal information, advise you of their contact details, your right of access to that information, and what will happen if you choose not to provide this information.

Personal information may be used to administer our products and services, as well as for prudential and risk management purposes and, if you agree, to provide you with related marketing information. We also use the information we hold to help detect and prevent illegal activity. We co-operate with police and other enforcement bodies as required or allowed by law.

Personal Data Quality

We take reasonable steps to ensure that the personal data we collect, use or disclose is accurate, complete and up to date. Please contact us by e-mailing us at info@stewartinvestors.com or writing to Client Services at 23 St Andrew Square, Edinburgh, EH2 1BB if any of the details you have provided change. Please also contact us if you believe that the information we have about you is not accurate, complete or up to date.

Personal information security

We are committed to keeping the personal data you provide to us secure. We take all reasonable precautions to protect the personal data we hold about you from misuse and loss and from unauthorised access, modification or disclosure. We have a range of physical and technological policies and procedures in place to provide a robust security environment. We seek to ensure the on-going adequacy of these measures by regularly reviewing them. Our security measures include, but are not limited to: restricting access to our computer systems and physical records to authorised persons and preventing users from accessing information they have no need to access; requiring employees to use unique passwords to gain access to systems (which are changed regularly); encrypting any data you send us over the internet when logging on to our website; employing firewalls, intrusion detection systems and virus scanning tools to prevent unauthorised persons and viruses from entering our systems; using dedicated secure networks or encryption when we transmit electronic data for purposes of outsourcing; providing secure storage for physical records; and detecting and preventing unauthorised access to buildings by employing physical and electronic means such as alarms and cameras.

Where we store your personal information

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. This includes staff engaged in, among other things, providing you with the information, investment products and services that you request from us. By submitting your personal data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy.

Cookies

We use cookies to enable and improve certain functions on our website and gain feedback on how our website is used. For detailed information on the cookies we use and the purposes for which we use them, please see our [Cookies Policy](#).

Links to other websites

Our website may contain links to third party websites. While such links are provided for your convenience, you should be aware that the information handling practices of the linked web sites might not be the same as ours. You should review any privacy policies on those linked websites. We are not responsible for any linked websites.

Telephone services

We monitor and record telephone calls for training and security purposes.

Access to your Personal Data

If you wish, you may also request a copy of the personal data held on you by us. We may charge you a fee for this of up to £10. If you would like to exercise this right, please put your request in writing to:

Client Services
23 St Andrew Square
Edinburgh
EH2 1BB

We will respond promptly and in any event within 4 days, to a request by you for a copy of personal data held. If we deny access to your personal information, we will, unless prevented by law or regulation, let you know why.

Disclosure of your personal information

ScotGems plc is associated with Stewart Investors. The entities trading as Stewart Investors are wholly owned subsidiaries of the Commonwealth Bank of Australia Group (the “**Group**”). The Group is a collection of related organisations that provide banking, finance, insurance, funds management, financial planning and advice, superannuation, stockbroking and other services.

The companies for whom Stewart Investors is a business name are listed below:

First State Investments (UK) Limited*

First State Investment Management (UK) Limited*

First State Investment Services (UK) Limited

First State Investments (UK Holdings) Limited

First State Investments International Limited *

*Authorised and regulated by the Financial Conduct Authority of the United Kingdom

You agree that we may share your personal information with any member of the Group.

We value your trust, and aim to help you manage and build wealth over a long period. The protection of your personal information is a vital part of this relationship. It is supported by our long experience of keeping personal information confidential.

However, you agree that, in the following circumstances, we may share your personal information with third parties:

We disclose relevant personal information to external organisations that help us provide services. These organisations are bound by confidentiality arrangements. They may include overseas organisations.

The law may require us to disclose your personal information in certain circumstances, or in order to enforce or apply our [terms and conditions](#), or to protect the rights, property, or safety of ScotGems Plc, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction;

We may disclose your information to third parties in the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets, or if ScotGems Plc or substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets.

If you have any questions or would like further information on our privacy and information handling practices, please contact us.

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Changes to our Privacy Policy

This Privacy Policy is dated June 2017. We reserve the right to change this policy at any time. Any changes we make to this policy will be posted on this page. Please check back regularly to see any updates or changes.