

SUTTERSON REED

Privacy Notice

Website Legal Documentation

Effective date	28 September 2026
Version	1.0
Website	www.suttonsonreed.com

Privacy Notice

This Privacy Notice explains how Sutterson Reed Ltd collects, uses, shares and protects personal data. It applies to visitors to our website, prospective and existing clients, professional contacts, introducers, counterparties, suppliers and other individuals whose personal data we process in connection with our activities.

1. Controller and contact details

Sutterson Reed Ltd is the controller of personal data covered by this Notice unless we expressly state otherwise. Company number: 14667555. Registered office: 3rd Floor, 45 Albemarle Street, London W1S 4JL, United Kingdom. Privacy enquiries and data protection requests may be sent to office@suttersonreed.com.

2. Personal data we may collect

- Identity and contact data, including name, title, address, email address, telephone number, date of birth and professional details.
- Client and transaction data, including information about financing requirements, assets, companies, ownership, source of funds or wealth, financial circumstances and proposed transactions.
- Due diligence and compliance data, including identification documents and information used for fraud prevention, sanctions, anti-money laundering, conflicts and risk assessment where relevant.
- Communications and relationship data, including correspondence, meeting notes, preferences, enquiries, instructions and records of our interactions.
- Technical and usage data, including IP address, browser and device information, website activity, cookie identifiers and security logs.
- Marketing and event data, including communication preferences and information relating to events, publications or relationship management.
- Information obtained from public sources or third parties, including Companies House, professional directories, counterparties, introducers, advisers, compliance providers and publicly available sources.

3. How we use personal data and our lawful bases

We process personal data only where we have a lawful basis. Depending on the circumstances, our purposes and lawful bases may include:

Purpose	Typical lawful basis
Responding to enquiries, assessing requests and taking steps towards an engagement	Contract or steps at your request before entering a contract; legitimate interests
Providing, administering and coordinating private office services and professional relationships	Contract; legitimate interests
Client, counterparty, fraud, sanctions and risk checks	Legal obligation where applicable; legitimate interests

Purpose	Typical lawful basis
Introducing or coordinating with banks, lenders, advisers and other providers where relevant to a request	Contract; legitimate interests; consent where required
Managing accounts, invoicing, records, disputes and legal claims	Contract; legal obligation; legitimate interests
Protecting our systems, website, confidential information and business	Legitimate interests; legal obligation where applicable
Relationship management and relevant business communications	Legitimate interests, subject to applicable direct marketing rules; consent where required
Website analytics and non-essential tracking	Consent where required under PECR and data protection law

4. Special category and criminal offence data

We do not seek to collect special category or criminal offence data through the website as a matter of routine. Such information may occasionally be processed where it is relevant and lawful, for example in enhanced due diligence, litigation or where you choose to provide it. Where additional legal conditions are required, we will apply them.

5. Sources of personal data

We may receive personal data directly from you, from a person acting for you, from an introducer or professional adviser, from a prospective transaction counterparty or service provider, from our technology and compliance systems, and from lawful public or commercial sources. Where required, we provide privacy information within the applicable period.

6. Sharing personal data

Where necessary for the purposes described above, we may share personal data with banks, lenders, family offices, payment or foreign exchange providers, lawyers, accountants, tax advisers, corporate service providers, valuers, surveyors, insurers, compliance and identity verification providers, technology and hosting providers, professional consultants, regulators, public authorities and courts. We disclose only what is reasonably necessary and, where appropriate, require recipients or processors to protect the information.

7. International transfers

Our work may involve international clients, assets, institutions and counterparties. Personal data may therefore be transferred outside the United Kingdom. Where UK data protection law requires safeguards for a restricted transfer, we use an applicable lawful mechanism, such as UK adequacy regulations, the UK International Data Transfer Agreement, the UK Addendum to approved standard contractual clauses, or another permitted safeguard, together with supplementary measures where appropriate.

8. Data retention

We keep personal data only for as long as reasonably necessary for the purpose for which it was collected, including legal, regulatory, tax, accounting, fraud prevention and dispute requirements.

Retention periods vary according to the relationship and data involved. Client and transaction records may ordinarily be retained for up to six years after the end of the relevant relationship or transaction, and longer where required or justified by law, a dispute, an investigation or an ongoing legitimate business need. Data that is no longer required is deleted, anonymised or securely archived.

9. Security

We use proportionate technical and organisational measures designed to protect personal data against accidental or unlawful destruction, loss, alteration, unauthorised disclosure or access. Measures may include access controls, authentication, secure systems, encryption where appropriate, restricted document access, provider due diligence, backups and staff or contractor confidentiality obligations. No internet-based system can be guaranteed to be completely secure.

10. Your rights

Depending on the circumstances, UK data protection law gives you rights to be informed, access your personal data, correct inaccurate data, request erasure, restrict processing, object to certain processing, receive certain data in a portable format and withdraw consent where processing relies on consent. Rights are subject to statutory conditions and exemptions. You may also object at any time to direct marketing.

To exercise a right, contact office@suttonsonreed.com. We may need to verify your identity before acting on a request.

11. Marketing communications

We may send relevant business communications to professional contacts or existing relationships where permitted by law and where our legitimate interests support doing so. Where consent is required, we will seek it. You can opt out of marketing at any time by using an unsubscribe facility where provided or contacting us. Opting out of marketing does not prevent service, transactional or legally required communications.

12. Cookies and similar technologies

Our website may use cookies and similar technologies. Strictly necessary technologies may operate without consent where the law permits. Non-essential technologies, including analytics or advertising technologies where used, are controlled through our consent mechanism. Please see our Cookie Notice for further information.

13. Automated decision-making

We do not ordinarily make decisions producing legal or similarly significant effects about individuals solely by automated means through this website. If that changes, we will provide the information required by applicable law.

14. Complaints

Please contact us first if you have a concern about our use of personal data so that we can investigate it. You also have the right to complain to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection. Information about complaints is available at ico.org.uk.

15. Changes to this Notice

We may update this Privacy Notice to reflect changes in law, regulation, technology or our activities. The current version will be published on our website with its effective date. Material changes will be brought to attention where appropriate.