



Privacy and Cookies

Privacy

As a result of the operation of or your use of this Website and also in connection with the services provided by Hurley Partners Limited, we may obtain certain information about you. This Privacy Policy sets out the principles governing our processing and use of that information.

By your access and use of this Website and, if we ask you to register to use any service, by your registration, you agree to our processing and use of that information in accordance with the principles set out in this Privacy Policy. Words and phrases defined in the Terms and Conditions have the same meanings in this Privacy Policy.

We respect your privacy and will not sell or make available information about you to persons outside Hurley Partners Limited except to the limited extent specified in this Privacy Policy or with your express consent.

If you register to use restricted parts of this website we may ask you to provide certain information such as your contact details and a password. We will store this information and will use the relevant information to contact you, to inform, offer or provide you with services and otherwise in connection with our use and improvement of this Website.

We may pass information we obtain about you to third parties:

- To enable you to gain access to restricted parts of this website or any other website
- To enable us to provide or for you to receive and/or pay for a service
- To enable you to receive information you have requested to be sent to you in order to fulfill a request you may have made.

Our Website may link to other websites. We are not responsible for the data policies or procedures of any other person or for the content of any other website. You should appraise yourself of the privacy policy and procedures applicable to such other websites.

Whilst we do take reasonable steps to keep information about you secure when in our possession we cannot guarantee the security of any information you disclose on-line. You accept the inherent security implications of providing information over the Internet and will not hold us responsible for any breach of security or disclosure of your information unless we have been negligent.

We may supplement the information you provide to us with information we receive from third parties.

Any personal information that is provided to us through this Website will be held in confidence and in accordance with the Data Protection Act 1998. You agree that your personal information may be disclosed to our agents and connected parties to Hurley Partners Limited and to any regulatory authority



to which our connected parties are subject. You have certain rights of access under the Data Protection Act 1998 to personal data held or processed by us or on our behalf. Further details of these rights are available on request. We reserve the right to charge for providing such access. Please write to The Data Controller, Hurley Partners Limited, 12 Conduit Street, Mayfair, London W1S 2XH.

We have certain responsibilities under money laundering legislation to verify the identity of clients and may need to make certain enquiries and obtain certain information from you for that purpose. You confirm that all information you supply will be accurate and that we may pass on such information, as we consider necessary to comply with any legal reporting requirements.

You agree that we may disclose to The Financial Conduct Authority (the organisation that regulates Hurley Partners Limited) and to any other regulatory authority to which we are subject and to any investment exchange on which we may deal or to its related Clearing House (or to investigators, inspectors or agents appointed by them), or to any person in power to require such information by or under any legal enactment, any information they may request or require relating to you or, if relevant, any of your clients.



Cookies

A cookie is a small piece of text stored on a user's computer by a web browser. Most modern browsers allow you to decide whether to accept cookies, and the time frame to keep them, but rejecting cookies may impair some of the functionality of this Website. We undertake not to abuse the personal identification aspect of cookies. We use the information to track visitor use of the Hurley Partners website and to compile statistical reports on website activity.

This website only uses strictly necessary cookies that are required for the operation of the website. The only cookies we use are:

- **utma** - *used by google analytics to track information on our website.*
- **utmz** - *again used for Google analytics purposes - scroll down to see more info on this page*
<https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage> there is table which lists those two cookies
- **is_cookie_accepted** – *used to store the users choice to accept cookies.*

These are used for display features during the navigation of the site and they expire at the end of your session.

You can find out more about cookies at www.allaboutcookies.org. If you have any questions about our Privacy and Cookie Policy, please contact us at info@hurleypartners.co.uk.

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