



QUILTER CHEVIOT
INVESTMENT MANAGEMENT

Summary of changes to our Terms of Business

The table below sets out a description of the main changes we are making to our Terms of Business (both for FCA regulated and non-FCA regulated intermediaries) with effect from 25 May 2018. Clause references are to those in the current versions of the Terms of Business.

1. FCA-regulated Intermediary Terms of Business

Clause	Description of Change
Interpretation	
1	We have included a new definition of “Applicable Data Protection Laws” to refer explicitly to the GDPR. We have included a new definition of “DFSA” and cross-referred to the DFSA in the definition of “National Regulator”
Quilter Cheviot	
2.1 and 2.2	We have included a reference to our DIFC Representative Office and the fact that we are regulated by the DFSA as a representative office in the DIFC.
Confidentiality and Data Protection	
11 and 12 (new clause)	We have separated the clauses on Confidentiality and Data Protection. The new clause 12 (Data Protection) cross-refers to our updated Privacy Notice which in-turn describes how we collect, use and protect personal information in accordance with the requirements of the GDPR.

2. Non-FCA-regulated Terms of Business

Clause	Description of Change
Interpretation	
1	We have included a new definition of “Applicable Data Protection Laws” to refer explicitly to the GDPR. We have included a new definition of “DFSA” and cross-referred to the DFSA in the definition of “National Regulator”
Quilter Cheviot	
2.1 and 2.2	We have included a reference to our DIFC Representative Office and the fact that we are regulated by the DFSA as a representative office in the DIFC.
Payment	
8	We have added a new clause 8.1 to reflect the fact that some financial adviser intermediaries who are not regulated by the FCA will have agreed an ‘adviser charge’ arrangement with their clients and that we may facilitate such an arrangement. Such arrangements are separately documented and, accordingly, Schedule 1 will not be applicable. We have made some minor changes to the rest of clause 8 to reflect this and the fact that any Payment arrangements set-out in Schedule 1 will be subject to verification by us.
Confidentiality and Data Protection	
9 and 10 (new clause)	We have separated the clauses on Confidentiality and Data Protection. The new clause 10 (Data Protection) cross-refers to our updated Privacy Notice which in-turn describes how we collect, use and protect personal information in accordance with the requirements of the GDPR.