



The Spectrum IFA Group

International Financial Advisers

Spectrum Client Charter – what you can expect from us Client Relationship Document (CRD)

This document details the association between Spectrum, Spectrum advisers and their clients. The term ‘Spectrum’ refers to those companies and advisers that form part of The Spectrum IFA Group.

1. **Independently owned:** The Spectrum IFA Group is independently owned. No financial institutions or other third parties have shareholdings in any part of the group. We are legally obliged to highlight those companies with whom we place more than 10% of our business: Prudential International and Utmost PanEurope are key participants in our market. Details of other product providers are available on request.

2. **Financial planning:** Spectrum offers a no obligation, no fee financial review and planning service. This allows prospective clients to fully understand our advice process and recommendations before choosing to become a client.

During this process we complete a comprehensive ‘know your client’ financial fact-find in order to understand your immediate circumstances as well as longer term plans, needs and objectives. We also complete a due diligence exercise in line with global anti-money-laundering regulations and assess your attitude to risk, professional financial experience and investment preferences, including in relation to Environmental, Social and Governance (ESG) factors.

3. **Reasons why:** Prior to completion of application documents, Spectrum will explain to you the type of product being recommended and supply a brochure (and any technical guide or other relevant material) for you to review and retain for future reference. Spectrum will take time to explain the product’s key features including charges and any potential cancellation penalties.

4. **Your money:** Spectrum doesn’t handle client money. All transactions are completed directly between you and the financial institution responsible for your investment.

5. **Remuneration:** Spectrum doesn’t charge fees directly to clients. We are remunerated with commissions paid to us by insurance or investment companies. As stated above, there is no fee payable for our financial planning service. If an investment fund within an insurance policy pays an additional initial commission, we undertake to rebate this to you in full by way of increased allocation. In the unlikely event that a fund is subject to a potential exit penalty, we will highlight details to you in writing. Where we take on the servicing of an existing contract, originally recommended by another advisory firm, we may arrange a servicing charge (deducted from the product), in which case it would be discussed and agreed with you in advance.

Details of Spectrum’s regulatory status, financial services licences, professional insurance, complaints procedure and general data protection information follow in this document.

Statutory corporate and regulatory information

This document is an essential element of the relationship between you and your Spectrum adviser. It contains a summary of the legal information that your adviser and Spectrum must communicate to you prior to entering into a professional relationship and is a supplement to the Spectrum corporate brochure.

If you are considering using a regulated and licensed professional adviser with the objective of assisting you with your financial planning. Please note the following:



With Care, You Prosper

Luxembourg | Lausanne | Rome | St.Julian’s | Paris | Eymet
Valbonne | Almancil | Barcelona | Madrid | Javea | Marbella



CORPORATE INFORMATION

Corporate name: TSG INSURANCE SERVICES SARL (TSG)

Registered office: 34 boulevard des Italiens, 75009 Paris, France

SIREN: 447609108 NAF / APE: 6622Z

TSG BRANCHES

Italy : via Ottaviano 105, Roma (rm). CAP 00192

Luxembourg : 11, avenue Guillaume, L-1651 Luxembourg. RCS Luxembourg: B 95136

Malta : Junction Business Centre, 1st Floor, Sqaq Lourdes, St Julian's, SWQ 3334. Reg No OC 1376

Portugal : Rua Sacadura Cabral, Lote 262, Loja C, 8135-144 Almancil. Matricula 980731828

Switzerland : Avenue d'Ouchy 14, 1006 Lausanne. No Ref: 2009/02231 No Fed: CH-550-1057049-3

Corporate name : BASKERVILLE ADVISERS S.L. (BA)

Registered office : Paseo de Gracia 63, principal, 2a, 08008, Barcelona, Spain

CIF B63137020 Registro Mercantil de Barcelona, Tomo 35489, Folio 170, Seccion 8, Hoja B-269534

REGULATION

TSG is registered with ORIAS (Unique register of the financial intermediaries) under registration number 07025332. You can check this registration on the ORIAS website www.orias.fr for the following regulated activities:

Intermédiaire en Assurance - Insurance Intermediary (IAS): broker category B, level of advice 1

The activity of IAS is controlled by the Autorité de Contrôle Prudentiel et de Résolution – Prudential Control and Resolution Authority (ACPR): 4 Place de Budapest, 75436 PARIS Cedex 09 and internet: <https://acpr.banque-france.fr/>

Conseiller en Investissements Financiers - Financial Investments Adviser (CIF): Non-independent advice as defined in article 325-5 of the RGAMEF, registered with Association Nationale des Conseils Financiers - National Association of Financial Advisers (ANACOFI-CIF) organisation approved by the Autorité des Marchés Financiers - Financial Markets Authority (AMF), postal address: 17 Place de la Bourse 75082 Paris Cedex 02 and internet address: <https://www.amf-france.org/en>

TSG is fully committed to comply with the ANACOFI-CIF Code of Conduct - available at the association's headquarters on <https://www.anacofi.asso.fr> or <https://www.anacofi-cif.fr/>.

TSG in Switzerland is regulated by FINMA. Licence Number: 25488

BA in Spain is a Correduría de Seguros; No de registro (licence no) RDGS J2306

Professional insurance

In accordance with EU and local laws TSG and BA have professional civil liability insurance coverage for its various financial activities. This insurance coverage complies with the requirements of the Monetary and Financial Code and the Insurance Code among other regulations.

TSG France and EU Branches

QBE Europe - Policy Number : 103191- Insurance coverage (IAS) : €3,000,000

Investment coverage (CIF): €1,000,000

TSG Switzerland

AIG Europe - Policy Number : ZF33A00326

Coverage: CHF 2,000,000

BA Spain

AIG Europe - Policy Number : 0131900503.1330 - Coverage: €2,100,000

List of main product suppliers

Name	Nature	Type of agreement	Mode of remuneration
Prudential	Insurer	Broker's agreement	Commissions
AG2R La Mondiale	Insurer	Broker's agreement	Commissions
Onelife	Insurer	Broker's agreement	Commissions
Sogelife	Insurer	Broker's agreement	Commissions
Metlife	Insurer	Broker's agreement	Commissions
Utmost PanEurope including Quilter	Insurer	Broker's agreement	Commissions

The names of the other companies with which Spectrum has agreements can be obtained by sending an email request to admin@spectrum-ifa.com

Invoicing and remuneration

The investment advice provided by TSG is defined as 'non-independent' in article 325-5 of the Règlement Général de l'Autorité des Marchés Financiers - General Regulation of the Financial Markets Authority (RGAMF). Likewise, TSG's activity as an insurance intermediary is defined by Article L521-2 II. 1 °. B) of the Insurance Code.

TSG assesses a limited range of financial products issued by financial institutions with which TSG maintains strong contractual relationships.

TSG does not charge you any direct fees. As a non-independent adviser, TSG can be remunerated by the companies supplying the intermediated products, in the form of commissions taken from part of the initial and ongoing costs of the products.

Complaints procedure

Spectrum complaints contact details:

By mail: Michael Lodhi, TSG Insurance Services SARL, 34 boulevard des Italiens, 75009 Paris , France.
or by email to: michael.lodhi@spectrum-ifa.com

Complaints processing: Spectrum will process your complaint within the following deadlines:

Maximum 10 working days from reception to acknowledge receipt of your complaint, except if the query is answered within this timescale.

Two months maximum between the date of receipt of the complaint and the date of dispatch of our response, except in the case of duly justified special circumstances.

MEDIATOR CONTACT DETAILS

For ANACOFI: Médiateur de l'Anacofi, 92 Rue d'Amsterdam, 75009 Paris

For CIF activities: Ms. Marielle Cohen-Branche Médiateur de l'AMF, Autorité des Marchés Financiers 17, Place de la Bourse 75082 Paris Cedex 02

Website: <https://www.amf-france.org/en/amf-ombudsman/how-mediation-works/what-ombudsmans-remit>

For insurance activities: La Médiation de l'Assurance TSA 50110 75441 PARIS CEDEX 09

Website: <http://www.mediation-assurance.org/Saisir+le+mediateur>

BASKERVILLE ADVISERS S.L. CLIENT SERVICES DEPARTMENT

In accordance with the terms of ECO/734 of 11 March 2004, relating to client services departments and client ombudsmen, BA have a Client Services Department. REPRESENTATIVE: CROWE LEGAL Y TRIBUTARIO BCN, S.L.P, (Passeig Sant Joan, 33, 08010 BARCELONA, www.crowe.com), contact for this service is Olga del Castillo Alegre elcol-legi@elcol-legi.org BA has approved a set of Regulations governing the operation of its client service process (a copy is available <https://spectrum-ifa.com/financial-advisers-in-spain/legal-spain/>).

MODE OF COMMUNICATION

Spectrum will communicate with you by letter, email and/or telephone.

Information notice regarding the processing and protection of personal data:

The personal data collected by Spectrum will be saved in a computerised file on a secure server, and will only be used to understand your current situation and prepare recommendations to help you achieve your financial goals. This “Know your client” exercise forms part of our advisory process and is also a regulatory requirement, which upholds the principles of best practice and best advice.

The person in charge of the processing and protection of personal data at Spectrum is Anne Ollerenshaw. The recipients of this data are:

1. The administrative personnel of Spectrum
2. The company supplying the product to which you will subscribe, if applicable.

This information will be kept for the duration of our professional relationship and for a minimum of five years after the end of the relationship (see L.561-12 of the CMF). In Spain for ten years.

In accordance with EU General Data Protection Regulations, you can exercise your right of access, opposition and portability of your personal data and have it rectified by contacting:

TSG Insurance Services SARL, 34, Boulevard des Italiens, 75009 Paris, France.

Baskerville Advisers SL, Paseo de Gracia 63, principal, 2a, 08008, Barcelona, Spain.

Or by email to: anne.ollerenshaw@spectrum-ifa.com

Data Protection in Compliance with due diligence obligations: Baskerville advisers SL

In compliance with Regulation (EU) 2016/679 General Data Protection, we inform you that BASKERVILLE ADVISERS SL with CIF B63137020 is the Data Controller; the data will be processed solely for the adoption of due diligence measures for prevention purposes and for the Ordinary management of the business relationship, in compliance with article 32bis of Law 10/2010, of April 28, on the Prevention of Money Laundering and Financing of Terrorism. The processing of personal data is a legal requirement and the interested party is obliged to provide the personal data.

The legitimacy for the processing of your personal data is compliance with a legal obligation applicable to the Data Controller. Your data may be communicated to the Bank of Spain, to SEPBLAC (Executive Service of the Commission for the Prevention of Money Laundering) and other Official Bodies. Outside of these cases, your data will not be transferred to third parties except by legal obligation. Nor are international transfers of personal data foreseen. Your data will be kept for a period of ten (10) years in compliance with the applicable regulations, plus the time necessary to comply with legal obligations. You have the right to access, rectify, limit, cancel, request data portability and more information, by sending a written request that accompanies your identification to BASKERVILLE ADVISERS SL, with registered office at Paseo de Gracia 63, Pal. 2a.,08008 Barcelona or by email at baskerville@spectrum-ifa.com attaching a copy of your ID.

You will also have the right to file a claim with the competent Control Authority www.aepd.es

Date and signatures

Adviser name:

Date:

Client name:

Client name:

I/we confirm receipt of this four page Client Charter and Relationship document.

Client signature:

Client signature:

Two copies, one retained by client(s)

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