

TRICOR UK PRIVACY NOTICE

1. About us and this privacy policy and our role

Tricor UK is made up of Tricor Services Europe LLP, Tricor Secretaries Limited and other group companies which may be appointed to provide services for you, as specified in our engagement letter. This privacy notice is issued on behalf of all such group companies involved in the provision of services to you, so when we mention “**we**”, “**our**” or “**us**” in this privacy notice, we are referring to relevant company responsible for processing your data. We will be the data controller in respect of your personal data received by us in connection with our services.

In order to provide our services to you, your business or the business you work for, we will need to collect and process certain personal information about you.

We are committed to protecting the privacy and security of your personal information, in accordance with the applicable data protection laws, including the General Data Protection Regulation (**GDPR**). This privacy notice describes how we collect and use personal information about you during and after our relationship with you.

2. Data we collect

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Contact Information**, such as first name, company name, job title, residential address or work address, work and personal email address and telephone numbers.
- **Relationship Information**, such as details about payments to and from you and details services you have received from us and other information collected by us in the course of our relationship with you.
- **Financial Data**, such as bank account and payment card details, if we take payments directly from you, tax information, payroll, investment interests and assets, insolvency records.
- **Marketing and Communications Data**, i.e. your preferences in receiving marketing from us and our third parties and your communication preferences.

Most of the information will be provided to us **directly by you**, but we may also receive your personal data from your company and/or other business advisers appointed by you. Occasionally we may receive information about you **from other sources** (such as credit reference agencies or identity or data verification service providers), which we will add to the information we already hold about you in order to help us comply with our legal obligations and to better understand our customers.

We do not normally collect any **special categories of personal data** (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). However, in exceptional circumstances we may need to collect special categories of personal data, such as for example information about dietary requirements or disabilities if you attend an event organised by us. We will only collect such data for legitimate reasons, for example meet your dietary requirements.

In certain circumstances we may be required to carry out enhanced due diligence checks to comply with our obligations under the Money Laundering Regulations 2017. These enhanced checks may reveal information about **criminal convictions or information about an individual's political opinions and associations** and/or other sensitive personal data. We will only collect and process such information to the extent necessary to comply with our regulatory obligations and in accordance with the applicable data protection laws.

If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you (your business or your employer, as applicable), and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into to provide our services. In this case, we may not be able to provide our services, but we will notify you if this is the case at the time.

3. Lawful basis and purposes of processing of your personal information

We will only use your personal information when the law allows us to, i.e. when it is necessary to:

- perform our contractual obligations towards you;
- comply with our legal and regulatory obligations;
- pursue our legitimate interests, and your interests and fundamental rights do not override these interests. Our legitimate interests may include:
 - providing services to our clients, for example where when you work for a company that engages us;
 - running our business in an efficient and profitable manner;
 - sending direct marketing by email, such as newsletters or notifications about events, but only when we are allowed to do so under the current data protection laws, for example when you work for a company and we send you our newsletters to your work address;
- It may also become necessary to process your personal data for legitimate interests of a third party, such as your business or employer (if applicable).

Generally, we do not rely on consent as a legal basis for processing your personal data.

We collect information about you so that we can:

- respond to your enquiries;
- provide our services to you, your company or your employer (as applicable);
- promote and improve our services;
- identify you, conduct “know your customer” and anti-money laundering checks, if applicable;
- liaise with your other business advisers (if relevant to the provision of our services), our suppliers and group companies;
- manage our relationship with you, your company and/or your employer (if applicable);
- manage our business, including for accounting and auditing purposes;
- conduct our regular group reporting activities on the performance of our company, in the context of a business reorganisation or group restructure;
- maintain our IT systems and manage hosting of our data; and
- deal with legal disputes involving you, you company and/or employer (if applicable) or our suppliers or other parties whom we engage in connection with our services to you.

Some of the above grounds and purposes for processing will overlap and there may be several grounds which justify our use of your personal information.

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

4. Will we disclose your personal information to anyone?

We will share your personal information with third parties such as:

- other companies within our group, where necessary for administrative purposes and in connection with the provision of our services;
- if applicable, the relevant group company appointed to provide nominee services, as specified in our engagement letter;
- our agents and service providers (including our professional advisers);
- credit reference agents;
- your other business advisers (if necessary in connection with our services);

- law enforcement agencies in connection with any investigation to help prevent unlawful activity; and
- in the context of the possible sale or restructuring of our business.

We require third parties to respect the security of your data and to treat it in accordance with the law. All our third-party service providers and other entities in the group are required to take appropriate security measures to protect your personal information. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

5. Keeping your data secure

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

While we will use all reasonable efforts to safeguard your personal data, you acknowledge that the use of the internet is not entirely secure and for this reason we cannot guarantee the security or integrity of any personal data that are transferred via the internet. If you have any particular concerns about your information, please contact us (see 'How can you contact us?' below).

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

6. Transfers of your information out of the EEA

We may need to transfer your personal data outside the European Economic Area (EEA), for example if one of our suppliers or group companies is located outside the EEA. We will ensure that any transfer of your data will be subject to appropriate safeguards, such as for example a European Commission approved contract (if appropriate) that will ensure you have appropriate remedies in the unlikely event of a security breach.

7. Data retention

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. For example, by law, we have to keep certain information about our customers for six years after they cease being our customers for tax purposes. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you.

8. Rights and duties

Inform us of changes to your personal information

It is important that the personal information we hold about you is accurate and current. Please let us know if your personal information changes during your relationship with us.

Your rights in connection with personal information

Under certain circumstances, by law you have the right to:

- **Request access** to your personal information (commonly known as a “data subject access request”). This enables you to receive a confirmation from us as to whether we process any of your personal information or not, and if this is the case, to receive a copy of such personal information and to check that we are lawfully processing it.
- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal information (often referred to as “the right to be forgotten”). This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground.
- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it, or if we no longer need your data for our legitimate interests but we need to hold some of it for the purpose of legal proceedings.
- **Request the transfer** of your personal information to another party.

If you would like to exercise any of the above rights, please:

- email, call or write to us (see paragraph 9 below);
- let us have proof of your identity and address (a copy of your driving licence or passport and a recent utility or credit card bill). This is to allow us to verify your identity and prevent disclosure to unauthorised third parties; and
- let us know the details of your request, for example by specifying the personal data you want to access, the information that is incorrect and the information with which it should be replaced.

Please note that if you request erasure, object to our processing of your personal data or request the restriction of our processing of your personal data we may not be able to provide our services in relation to your investments.

9. Contact us or the ICO

Please contact us if you have any questions about this privacy policy or the information we hold about you.

If you wish to contact us, please send an email to info@uk.tricorglobal.com or write to us at Group Privacy Officer, Tricor Services Europe LLP, 50 Mark Lane, London EC3R 7QR or call us on 020 3216 2000.

You can also contact the Information Commissioner's Office on 0303 123 1113.

10. Changes to the privacy policy

We may change this privacy policy from time to time. You can contact us if you wish to receive a copy of this policy occasionally.