



Client Privacy Policy

Heronsgate Capital LLP is committed to protecting and respecting your privacy. This policy sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it. For the purpose of the General Data Protection Regulation 2018 (GDPR), the data controller is Heronsgate Capital LLP. Heronsgate Capital LLP is authorised and regulated by the Financial Conduct Authority under FCA Registration No. 933757. Heronsgate Capital LLP is a limited liability partnership, registered in England and Wales with registration number OC430243 and registered office at 28 Queen Street, London, EC4R 1BB.

Information we may Collect

We may collect and record personal data from a variety of sources, but mainly directly from you. You will usually provide information during the course of our initial conversations or meetings with you to establish your circumstances and needs and preferences in relation to investment, finances, pension and insurance. You will provide information to us verbally and in writing, including email. We may collect and process the following data about you:

- If you contact us, we may keep a record of that correspondence;
- Data which is held in relation to living individuals who can be identified
 - from those data, or
 - from those data and other information which is in the possession of, or is likely to come into the possession of, the data controller, and includes any expression of

opinion about the individual and any indication of the intentions of the data controller or any other person in respect of the individual;

- Your contact details, such as your name, address, telephone number and email address;
- Your date of birth, gender, nationality, civil/marital status, country of birth, country of residence, employment status and tax identification number (i.e. National Insurance Number);
- Passport details, driving licence and utility bills;
- Details of the services you request from us;
- Any records held by financial crime prevention agencies, on the Electoral Register and by providers of utility services;
- Details of your employment status, income and source of wealth;
- Bank account details, tax information, loans and credit commitments, personal credit history, sources of income and expenditure, family circumstances and details of dependents;
- Health status and history (further details are provided below specifically with regard to the processing we may undertake in relation to this type of information); and
- Any pre-existing investment, mortgage, finance, pension and insurance products and the terms and conditions relating to these.

In some cases, you are not obliged to provide any personal data to us, but if you have requested information or a service from us, we will not be able to provide it without certain information, such as your contact details. Before we can begin providing you with our services, we need to obtain certain information about you, so that we can verify your

identity in order for us to meet our obligations under the Money Laundering, Terrorist Financing and Transfer of Funds Regulations 2017 and any other applicable legislation and for the purposes of crime prevention and fraud prevention. **You are obliged to provide this information and if you do not provide it, we will be unable to provide you with our services.**

Data collected will be processed fairly and lawfully, and will only be processed where we comply with Article 6(1) of the GDPR. We will ensure that we meet one of the key principles when processing your personal data:

1. **Consent** - You have **given consent** to the processing your personal data for one or more specific purposes;
2. **Contract** - The processing is necessary for the performance of a **contract** to which you and Heronsgate Capital LLP are party to or in order to take steps at the request of the data subject prior to entering into a contract; and
3. **Legal Obligation** – the processing is necessary for **compliance with a legal obligation** to which Heronsgate Capital is subject.

The primary legal basis that we intend to use for the processing of your data is for the performance of our contract with you.

Where we store your Personal Data

The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area (“EEA”). It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. Such staff may be engaged in, among other things, the fulfilment of your order, the processing of your payment details and the provision of support services. By submitting your personal data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy. Such steps may include only transferring your data to jurisdictions in respect of which there is a European Commission adequacy decision or, where this is not the case, by using model clauses which have been approved by the European Commission. All information you provide to us is stored on our systems securely. Unfortunately, the transmission of information via the Internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

Uses made of the Information

We use information held about you in the following ways:

- To undertake checks such as identification verification checks with fraud prevention agencies to enable us to comply with our anti-money laundering obligations and for the purposes of crime prevention and fraud prevention;
- To carry out our obligations arising from any contracts entered into between you and us;
- To notify you about changes to our service; and
- To provide you with information, products or services that you request from us or which we feel may interest you, where you have consented to be contacted for such purposes. You may opt out of receiving this information when we collect details or at any time by contacting us using the contact details below.

Where you ask us to assist you with, for example, life insurance and insurance that may assist you in the event of an accident or illness, we will ask you for information about your health and medical history (“Sensitive Data”). We will record and use your Sensitive Data in order to make enquiries of potential providers in relation to insurance products that may meet your needs and to provide you with advice or guidance regarding the suitability of any product that may be available to you. If you have parental responsibility for children under the age of 18, we will record information on our systems that relates to those children and potentially, to their Sensitive Data. Where applicable we also collect information about your dependants, spouse, beneficiaries or next of kin. Before providing us with this information, you should provide a copy of the information in this notice to those individuals and have their agreement for the information to be shared with us.

Disclosure of your Information

We may disclose your personal information to third parties, but only under appropriate conditions of confidence and with confirmation that your data will continue to be protected in compliance with data protection legislation:

- In the event that we sell or buy any business or assets, in which case we may disclose your personal data to the seller or buyer of such business or assets;
- If Heronsgate Capital LLP or substantially all of its assets are acquired by a third party, in which case personal data held by us about our customers will be one of the transferred assets;
- Our appointed auditors, accountants, lawyers and other professional advisers (e.g. compliance consultants), to the extent that they require access to the information in order to advise us;

- Fraud prevention agencies and other organisations (details of which are available on request) to allow us to undertake the checks set out below;
- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our Terms of Business and other agreements; or to protect the rights, property, or safety of Heronsgate Capital LLP, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction; and
- For the provision of services to you.

Access to Information

GDPR gives you rights about the information held about you. Your right of access can be exercised in accordance with GDPR and this is known as a Subject Access Request.

Right of Access

You will have the right to obtain, on request, confirmation as to whether your personal data is being processed, together with the following information:

- The purpose of processing your data;
- Information about the recipients of your data;
- Recipients or categories of recipient to whom the personal data will be disclosed (in particular third countries or international organisations);
- The right to lodge a complaint with a data protection authority;
- In cases of automated processing, details of profiling; and
- Information about the sources of data.

Information must be provided to you within one month at no cost to you. However we have the right to refuse or charge a reasonable fee when a request is manifestly unfounded or excessive, particularly if it is repetitive.

Under GDPR, you also have the following rights:

- Right to be informed;
- Right to rectification;
- Right to be forgotten (erasure);
- Right to restrict processing;
- Right to data portability;
- Right to object; and
- The right not to be subject to automated decision making, including profiling.

You have the right to withdraw consent at any time, this must be provided in writing.

Retention Periods

Unless otherwise specified in this privacy policy, we keep your personal information only for as long as required by us:

- to provide you with the services you have requested;
- to comply with other laws, including for the period demanded by our tax authorities; and
- to support a claim or defence in court.

Changes to our Privacy Policy

Any changes we may make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail.

Contact

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to the Data Protection Officer, Heronsgate Capital LLP, 28 Queen Street, London, EC4R 1BB, or by email at privacy@heronsgatecapital.co.uk.