

SAPENO PARTNERS LLP - PRIVACY POLICY

Sapeno Partners LLP ("Sapeno") is authorised and regulated by the Financial Conduct Authority, registration number 628713. Sapeno is committed to the security, confidentiality and protection of personal data. This policy explains how we use personal data and should be read in conjunction with any other documentation provided directly to you.

GENERAL DATA PROTECTION REGULATION

The European Union (EU) General Data Protection Regulation (GDPR) will be enforced from 25th May 2018. It supersedes the UK Data Protection Act 1998. Under the regulations, the definition of personal data is expanded and individuals are given the right to control and choose how their personal data is used.

PERSONAL DATA

According to the Information Commissioner's Office (ico.org.uk) the GDPR applies to 'personal data', meaning any information relating to an identifiable person who can be directly or indirectly identified by reference to an identifier. The data we collect is detailed below.

DATA CONTROLLER

A controller determines the purposes and means of processing personal data. For the purposes of this policy, Sapeno is a data controller in respect of any personal information we hold about you.

HOW WE OBTAIN YOUR PERSONAL DATA

We collect personal data through services that we provide and receive. Typically, it comes from the following sources:

- Contractual agreements or other material provided during our relationship.
- Correspondence received from you such as email, telephone conversations, facsimiles, letters, face to face discussions, text messages, business cards, contact through our website and other forms of communication. We may keep a record of all correspondence received.
- Depending on our business relationship, we may use third party firms for credit reference and know your client checks.

PERSONAL DATA WE COLLECT

We collect information to assist in the provision of our services. This information may include:

- Your full name, including title.
- Your occupation and job title.
- Contact details for you at your place of business such as address, email and telephone numbers.

- Information required to conduct 'know your client' checks such as details relating to your passport or other photographic identification, your credit history, employment history, current and previous addresses and source of funds.

Please note, we do not request any special categories of personal data. Under the GDPR, special category data is more sensitive and therefore needs more protection. Categories include race; ethnic origin; politics; religion; trade union membership; genetics; biometrics (where used for ID purposes); health; sex life; sexual orientation.

When requested, you are not required to provide personal information, however, in doing so, we may not be able to proceed with a business relationship.

OUR USE OF YOUR INFORMATION

We collect and use information to provide services to you, or to receive services from you, in accordance with contractual obligations. We only use your information for our legitimate interests or, in certain circumstances, for those of a third party.

Our legitimate interests are:

- To provide information relevant to the services we provide.
- To facilitate our business operations and to ensure compliance with any legal and regulatory requirements that we are subject to.

INFORMATION DISCLOSURE

Personal information may be disclosed to third party associates who provide us with professional, legal, accounting or other services. This may include providing personal data to third parties to comply with anti-money laundering regulations.

All third parties are required to maintain the confidentiality of your personal data and to treat it in accordance with the law. Third parties are not permitted to use your data for any purpose other than that covered by their contractual arrangements with us.

We may disclose your personal information as required by, or to comply with, legal, regulatory or statutory requirements, or at the request of supervisory or governmental bodies.

Your personal data is not shared with any other organisations for marketing purposes and will not be used by us for marketing purposes unless explicit consent has been provided by you.

YOUR RIGHTS

Data protection laws provide you with the following rights:

- The right to check if we hold personal information about you.
- The right to see the information we hold about you.
- The right to have inaccurate information rectified.
- The right to be forgotten and to have certain information erased.
- The right to restrict processing of your personal data.
- The right to request that your personal information is transferred to a commonly used machine-readable format and provided to you or a third party.
- The right to object to the use of your information, including the right to restrict marketing.
- The right to restrict automated decision making and profiling.
- The right to withdraw consent previously provided to us to handle your information.

To exercise any of these rights, please get in touch using the contact details at the bottom of this Policy.

Please note, if you are a client, by executing some of these rights, we may not be able to continue providing services to you.

If you are not satisfied with how we have handled your information you have a right to complain to the Information Commissioner's Office (ico.org.uk).

RETENTION

We can retain your personal information for as long as required to provide services to you. After the termination of contracts, we may retain data for a period of six years to comply with legal and regulatory requirements. After the expiration of six years, your personal data will be deleted.

If compelled to do so by statutory, regulatory or governmental bodies, we may retain your personal data for longer than six years.

THIRD PARTY WEBSITES

Our website may include links to others, but we are not responsible for the accuracy or completeness of information supplied by third party sites. We suggest you read the individual privacy policies for any websites visited.

COOKIES

When accessing our website and client portal, cookies, small text files placed on your computer, may be used. Browsers recognise when a cookie is offered and permit you to refuse or accept it. We cannot see your IP address when you access our website

TRANSFERS ABROAD

The GDPR imposes restrictions on the transfer of personal data outside the European Economic Area (EEA). The EEA is comprised of the EU countries plus Iceland, Liechtenstein and Norway. The European Commission has decided that certain countries and territories, including Jersey, Guernsey, Isle of Man and Switzerland, also have an adequate level of protection for personal data.

The 'Transfers Abroad' restrictions are in place to ensure that the level of protection afforded to individuals by the GDPR is not undermined. We may, at times, under agreements with third party business associates, transfer or store your personal data outside the EEA or other countries deemed by the European Commission to have adequate levels of protection in place; however, this would only happen if the third party business associates we are contracted with adhere to similar protections provided by the GDPR.

CONTACT US

If you have any questions, or wish to exercise any of the rights detailed above, please email Richard Malpas at richard@sapeno.com.