

BELGRAVE ASSET MANAGEMENT LTD

PRIVACY POLICY

Introduction

This policy sets out the obligations of Belgrave Asset Management Ltd in relation to the clients whose personal data we use, including our obligations in respect of the way in which we process, store and protect client data.

We actively ensure that the necessary steps are taken to protect the privacy of our clients in all their dealings with us. We believe that our approach complies with all UK national laws and requirements for user privacy.

What personal data do we hold?

We hold only such personal data (name, address, email, account details, etc.) about our clients as we consider is necessary in order for us to provide to them the services that we offer to provide. A complete list of the personal data that we hold is on our "Schedule of Personal Data Held" – available on request.

We will or may use this information to administer applications, maintain client databases and issue marketing material. We will ensure that all personal information supplied is held securely in accordance with the Data Protection Acts 1998 and 2018.

When you have provided telephone, fax or e-mail details to us, we will assume that you consent to us using those method(s) when we need to contact you.

How do we obtain personal data?

We obtain personal data about our clients only from the clients themselves, with their consent, or from other organisations (such as product providers) from whom our clients have agreed that we may obtain information. We do not 'buy' information about clients or potential clients. Nor do we use social media to gather data, nor use your location data if you access our website from your smartphone.

How do we look after personal data?

All personal data that we hold is held securely – electronic data is protected by passwords/encryption and is backed up regularly; paper-based data is held in locked storage.

We keep data for as long as we think that we will need it, but no longer.

How do we use personal data?

We will use, or may use, your personal data to administer on your behalf the applications that you make and any other instructions you give through us; to maintain an up to date record of your investments held through us; to ensure that our client database is accurate and up to date; and for marketing purposes. Our permitted range of uses is recorded on, and available for inspection at, the Information Commissioner's Office register.

We will ensure that all personal information supplied is held securely, and in accordance with the Data Protection Acts 1998 and 2018.

What are your rights?

You have the right at any time to request a copy of the personal information we hold about you. Should you wish to receive a copy of this, or would like to be removed from our database, please contact us at 21b Charles Street, Bath, BA1 1HX, by telephone (01225 484141) or by e-mail at

You can verify the data we hold about you by contacting our customer services team at the address above. Our security procedures mean that we may request proof of identity before we reveal that information to you.

You can also contact us at any time by the same method to change, correct, or delete your personal data controlled by us, or to update us on your details. You can request a readable copy of the personal data we hold on you at any time. To do this, please contact us as above.

You are also free to close your relationship with us at any time. However, we may retain archived copies of your information as required by law or for legitimate business purposes (including helping to avoid fraud and spam).

You can unsubscribe from receiving marketing e-mails from us by clicking the “unsubscribe” link at the bottom of any marketing e-mail that we send to you. Once you do this, you will no longer receive any marketing e-mails from us.

Cookies

‘Cookies’ are small files saved to the user’s computer hard drive that track, save and store information about the user’s interactions and usage of websites. They allow a website, through its server, to provide the users with a tailored experience within the website.

Our website uses cookies to remember personal settings you have chosen at our website. In no other context do we use cookies to collect information that identifies you personally. Most of the cookies we set are automatically deleted by your computer when you leave our website, or shortly afterwards.

Our website uses anonymous session cookies (short-term cookies that disappear when you close your browser) to help you navigate the website and make the most of its features. If you log into our website as a registered user, your session cookie will also contain your user ID so that we can check which services you are allowed to access.

Our website uses tracking software to monitor its visitors, better to understand how they use it. This software is provided by Google Analytics which uses cookies to track visitor usage. That software will save a cookie to your computer’s hard drive in order to track and monitor your engagement and usage of the website, but will not store, save or collect personal information.

Should you wish to prevent the use and saving of cookies from our website onto your computer’s hard drive, you should take necessary steps within your web browser’s security settings to block all cookies from our website.