

OWL PRIVATE OFFICE HOLDINGS LIMITED

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Owl Private Office Holdings Limited (Owl) is an appointed representative of Thornbridge Investment Management LLP which is authorised and regulated by the Financial Conduct Authority.

PRIVACY NOTICE

1. About This Notice

Owl is committed to protecting your personal and sensitive information. This notice applies to any data you supply to us and explains

- why and how we retain and process it
- what rights you have
- what our obligations are

Owl takes our responsibility very seriously and maintain stringent data protection security standards. If you have any questions or comments, please contact andrew@owlprivate.co.uk

‘Personal data’ is defined as any information that relates to an identified or identifiable natural person (rather than to a legal entity, such as a company).

2. What types of personal data do we collect?

Owl will, depending on the relationship we have with you, collect and process personal data about you. This data can include:

- personal details such as your name, identification number, date of birth, know your client (KYC) documents (including a copy of your passport or national identity card), phone number, physical and electronic address, and family details such as the name of your spouse, partner, or children;
- financial information, including information relating to your assets (including fixed properties), financial statements, liabilities, taxes, revenues, earnings and investments (including your investment objectives)
- tax domicile and other tax-related documents and information
- where applicable, professional information about you, such as your job title and work experience
- your knowledge of and experience in investment matters
- details of our interactions with you and the products and services you use
- we do not record phone calls between you and Owl but we do keep contemporaneous notes of our calls
- where we have your email address stored in software, we track and store email communications between you and Owl
- where applicable, Power of Attorney details
- identifiers we assign to you, such as your client codename

- in some cases (where permitted by law), special categories of personal data, such as your health information, and, to the extent legally possible, information relating to criminal convictions or offences.
- in some cases, we collect information from public registers (which, depending on the product or service you receive, may include beneficial ownership and other registers), public administration or other third-party sources, such as wealth screening services, credit reference agencies and fraud prevention agencies.
- if relevant to the services we provide to you, we will also collect information about additional third parties related to you including, business partners (including other shareholders or beneficial owners), dependants or family members, representatives, and agents. Before providing Owl with this information, you should provide a copy of this notice to those individuals.

3. On which legal basis and for which purposes do we process personal data?

3.1 Owl's legal basis for processing

Depending on the purpose of the processing activity (see section 3.2), the processing of your personal data will be one of the following:

- necessary for the 'legitimate interests' of Owl, without unduly affecting your interests or fundamental rights and freedoms (see below);
- in order to enter into with you and supply the services or products you request, or for carrying out our obligations under such a contract, such as when we use your data for some of the purposes in sections 3.2(a), (b) and (c) as well as certain of the data disclosures described in section 4;
- required to meet our legal or regulatory responsibilities, including when we conduct the checks referred to in section 3.2(a) below and make the disclosures to authorities, regulators and government bodies referred to in sections 3.2(e) and 4 below;
- in some cases, necessary for the performance of a task carried out in the public interest;
- when we use special categories of personal data, necessary for establishing, exercising or defending legal claims or where the processing relates to personal data manifestly in the public domain; and
- in limited circumstances, processed with your consent which we obtain from you from time to time (for instance where required by laws), or processed with your explicit consent in the case of special categories of personal data.

Examples of the 'legitimate interests' referred to above are:

- Meeting our regulatory requirements
- Ensuring the quality of the services we provide to you
- Communicating with you

Such interests are not overridden by your privacy interests.

Any consent Owl has obtained to process ordinary personal data does not apply for the purposes of the EU General Data Protection Regulation 2016/679 ("GDPR"). Instead, for the purposes of the GDPR, Owl relies on the lawful grounds of compliance with a legal obligation, contractual necessity or legitimate interests (as specified in this notice) and Owl's ability to rely on any such consent for the purposes of the EU GDPR is hereby waived or extinguished.

Where the personal data we collect from you is needed to meet our legal or regulatory obligations or enter into an agreement with you, if we cannot collect this personal data there is a possibility we may be unable to accept you as a client or provide products or services to you (in which case we will inform you accordingly).

3.2 Purposes of processing

We always process your personal data for a specific purpose and only process the personal data which is relevant to achieve that purpose. In particular, we process personal data for the following purposes:

- a) our client take-on processes, including to verify your identity, and to conduct legal and other regulatory compliance checks (for example, to comply with anti-money laundering regulations, and prevent fraud);
- b) managing our relationship with you, including communicating with you in relation to the services you obtain from us and from our business partners, handling customer service-related queries and complaints.
- c) helping us to learn more about you as a customer, the services you receive, and other services you may be interested in receiving, for instance by looking at the types of products and services that you use from us, how you like to be contacted and so on;
- d) taking steps to improve our services and our use of technology, including testing and upgrading of systems and processes, and conducting market research to understand how to improve of our existing services or learn about other services we can provide;
- e) meeting our on-going regulatory and compliance obligations (e.g. laws of the financial sector, anti-money laundering and tax laws), including in relation to recording and monitoring communications, disclosures to tax authorities, financial service regulators and other regulatory and governmental bodies, and investigating or preventing crime;
- f) ensuring the safety of our customers, employees and other stakeholders;
- g) undertaking transactional and statistical analysis, and related research;
- h) for the business' prudent operational management (risk management, insurance, audit, systems and products training and similar administrative purposes); and
- i) any other purposes we notify to you from time to time.

3.2.1 Information used for marketing purposes

For the avoidance of doubt, Owl will, from time to time, use your information to identify services and events that we think may be of interest to you. Owl do not engage in any direct marketing and will not use your information to do so.

You have the right to ask us not to send you marketing messages by post, telephone, or email, or any combination of these at any time. You can do this by:

- Informing us that you do not wish to receive such materials
- Replying directly to the marketing message

4. Who has access to personal data and with whom are they shared?

4.1 Within Owl

Owl employees have access to personal data in order to ensure a consistently high service standard across our business, and to provide services to you.

4.2 Third Parties

When providing services to you, we will obtain explicit consent in order to share personal data with persons acting on your behalf or otherwise involved in the transaction (depending on the type of service you receive from us), including, where relevant the following types of companies.

- other financial institutions, credit reference agencies or credit bureaus (for the purposes of obtaining or providing credit references);
- any third-party fund manager who provides asset management services to you; and
- any introducing broker or intermediary (e.g. Lawyer, Accountant, Tax Adviser) to whom we provide introductions or referrals.

4.3 Owl's service providers

In some instances, we transfer personal data to our suppliers, to enable them to store and process the data on our behalf. Examples of third-party services providers we use are IT service and hosting companies, compliance advisor, communication services and credit reference agencies. When we do use third party providers, we take steps to ensure they meet our data security standards, so that your personal data remains secure.

4.4 Public or regulatory authorities

If required from time to time, we disclose personal data to public authorities, regulators or governmental bodies, including when required by law or regulation, under a code of practice or conduct, or when these authorities or bodies require us to do so.

4.5 Others

We may need to disclose personal data to exercise or protect legal rights, including ours and those of our employees or other stakeholders, or in response to requests from individuals or their representatives who seek to protect their legal rights or such rights of others.

5. International transfers of personal data

The Recipients referred to in section 4 above may be located outside the UK. In using our service providers, we may transfer, use and/or store your personal information outside of the European Economic Area ("EEA") and the laws of some of these destination countries may not offer the same standard of protection for personal information as in the UK.

Transfers to our third-party service providers are to enable them to use and store your personal information on our behalf. We will, however, put in place appropriate security procedures in order to protect your personal information. We also ensure that, where your information is transferred to any country outside the EEA this is done using specific legally approved safeguards.

6. How long do we store your data?

We will only retain personal data for as long as necessary to fulfil the purpose for which it was collected or to comply with legal, regulatory or internal policy requirements. To help us do this, we

apply criteria to determine the appropriate periods for retaining your personal data depending on its purpose, such as facilitating client relationship management, and responding to legal claims or regulatory requests. Examples of retention periods are set out in section 11 below.

7. Your rights

You have a right to ask Owl to rectify inaccurate personal data we collect and process and the right to request restriction of your personal data pending such a request being considered.

Where we process your personal data on the basis of your consent, you have the right to withdraw that consent at any time. Please also note that the withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.

You have a right to ask us to stop processing your personal data, or to request deletion of your personal data – these rights are not absolute (as sometimes there may be overriding interests that require the processing to continue, for example), but we will consider your request and respond to you with the outcome.

Where we process your personal data on the basis of your consent, or where such processing is necessary for entering into or performing our obligations under a contract with you, you may have the right under applicable data protection laws to request your personal data be transferred to you or to another controller. You have the right to ask Owl for a copy of some or all the personal data we collect and process about you.

You can exercise the rights set out above by contacting us using the details in section 8 of this notice.

8. Exercising your rights, and complaints

If you are not satisfied with any aspect of the processing of your personal data by Owl, we would like to discuss it with you to understand how we can rectify the issue. If you would like to speak to us about our use of your personal data, you can do this:

- by contacting an employee of Owl, or
- by contacting andrew@owlprivate.co.uk

If you are not satisfied with Owl's response, you have the right to make a complaint to the data protection authority in the jurisdiction where you live or work, or in the place where you think an issue in relation to your data has arisen.

If you wish to make a subject access request, please request a subject access request form from andrew@owlprivate.co.uk

9. Security Note

We have put in place appropriate technical and organisational measures to prevent unauthorised or unlawful access to the personal data you have provided to us. As complete data security cannot be guaranteed for communication via e-mails, instant messaging, and similar means of communication, we would recommend sending any particularly confidential information by an alternative secure means and using appropriate passwords when using unsecure mediums of communication. 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.

10. Changes to personal data

We are committed to keeping your personal data accurate and up to date. Therefore, if your personal data changes, please inform us of the change as soon as possible.

11. Example of retention periods

In general, Owl will retain personal data for the period of your relationship or contract with Owl plus 7 years, reflecting the length of time for which legal claims may be made following termination of such relationship or contract. An ongoing or anticipated legal or regulatory proceeding may lead to retention beyond this period. Due to requirements laid down by the Financial Conduct Authority (FCA), Owl must furthermore store all electronic correspondence (e-mails, etc.) and evidence of any calls made on business telephones by employees for a period of 7 years. Owl must also make this information available to the FCA on demand. Owl also stores all incoming and outgoing business and private communication data (in particular e-mails with attachments) in a separate, protected electronic archive located in Ireland for a period of 7 years.

12. Status of this privacy notice

This privacy notice was updated in April 2020. It is a notice explaining what Owl does, rather than a document that binds Owl or any other party contractually. We reserve the right to amend it from time to time. If the notice has been updated, we will take steps to inform you of the update by appropriate means, depending on how we normally communicate with you.