

Privacy Policy

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1. Introduction to our Privacy Policy

Parmenion Capital Partners LLP is committed to protecting your personal information.

Our Privacy Policy contains important information about what personal details we collect; what we do with that information; who we may share it with and why; and your choices and rights when it comes to the personal information you have given us.

We may need to make changes to our Privacy Policy; so please check our website for updates from time to time. If there are important changes; we will contact you to let you know.

Our Cookie Policy forms part of our Privacy Policy. When you browse our websites we use cookies to store information about how you use these websites in order to improve the quality of service provided to you. To understand what type of cookies we use and how these work when you use our websites you can access our Cookie Policy here <https://www.parmenion.co.uk/security-centre/cookies>.

This version of our Privacy Policy was last updated 3rd May 2018.

2. Who we are

We are Parmenion Capital Partners LLP ('Parmenion'), part of Aberdeen Standard Investments, one of the world's largest investment companies. This Privacy Policy applies to Parmenion Capital Partners LLP.

Aberdeen Standard Investments is a global investment group with leading institutional and wholesale distribution franchises, market leading platforms and access to long-standing, strategic partnerships globally.

3. How to contact us

If you have any questions about our Privacy Policy or the information we collect or use about you, please contact;

Parmenion Capital Partners LLP
FAO Data Protection Officer
2 College Square
Anchor Road
Bristol
BS1 5UE

Telephone: 0345 519 0100

Email: compliance@parmenion.co.uk

4. Information we collect and use

Information about you that we collect and use includes:

- Information about who you are e.g. your name, date of birth and contact details
- Information connected to your product or service with us e.g. your bank account details
- Information about your contact with us e.g. meetings, phone calls, emails / letters
- Information that is automatically collected e.g. via cookies when you visit one of our websites
- Information classified as 'sensitive' personal information e.g. relating to your health
- Children are not able to buy products and services from us. However, on instruction from a parent or guardian, a child can also be named as a beneficiary on some funds and trusts. In these cases, we collect limited personal information to identify the child (such as their name, age, gender).

Where we collect and use sensitive personal information, this information will only be collected and used where it's needed to provide the product or service you have requested or to comply with our legal obligations, and where we have also obtained your explicit consent to process such information.

5. Where we collect your information

We may collect your personal information directly from you, from a variety of sources, including:

- An application form for a product or service
- Phone conversations with us
- Emails or letters you send to us
- Meetings with one of our business development or relationship managers
- Registering for one of our events
- Participating in research surveys to help us understand you better and improve our products and services
- Entering competitions e.g. to win tickets to a sporting event which we sponsor
- Our online services such as websites, social media and mobile device applications ('Apps')

If you have a financial adviser, the information we collect and use will most likely have been provided by them on your behalf.

We may also collect personal information about you from places such as business directories and other commercially or publicly available sources e.g. to check or improve the information we hold (like your address) or to give better contact information if we are unable to contact you directly.

6. Why we collect and use your information

We take your privacy seriously and we will only ever collect and use information which is personal to you where it is necessary, fair and lawful to do so. We will collect and use your information only if we are able to satisfy one of the lawful processing conditions set out in the data protection laws. This will be the case where:

- It's necessary to provide the product or service you have requested e.g. if you wish to invest in one of our funds or products we will require some personal information which may include your name, address, date of birth, and bank account details
- It's necessary for us to meet our legal or regulatory obligations e.g. to send you Annual Statements, tell you about changes to Terms and Conditions or for the detection and prevention of fraud
- It's in the legitimate interests of Parmenion i.e. to deliver appropriate information and guidance so you are aware of the options that may help you get the best outcome from your product or investment; where we need to process your information to better understand you and your needs so we can send you more relevant communications about the products you have with us and to develop new products and services. Where the processing is in our legitimate interests, we will always conduct an assessment to ensure that this use of your personal information is not excessive or unnecessary or otherwise more intrusive than it needs to be
- You have given us your permission [consent] to use your information in this way. For example, if we are collecting and using your sensitive personal information or for certain types of direct marketing.

If you do not wish us to collect and use your personal information in these ways, it may mean that we will be unable to provide you with our products or services.

7. Marketing and Analytics

Where you have given your permission to do so (or, when given the opportunity have not objected), we will send you information from Parmenion Capital Partners LLP about products and services offered by Parmenion Capital Partners LLP, as well as other parts of Standard Life Aberdeen plc and / or our partners with whom we have entered into sponsorship arrangements or similar partnering arrangements.

You can provide or withdraw your consent in any of our communications via the link to our preference centre, located in the footer of each email.

We sometimes use systems to make automated decisions based on personal information we have - or are allowed to collect and use from others - about you. These automated decisions can affect the products, services or features we offer you now or in the future. We use automated decisions in the following ways:

- Tailoring products and services e.g. placing you in groups with similar customers to make decisions about the products and services we may offer you to help meet your needs
- When designing and enhancing our online services to help meet your requirements for ongoing guidance and support.

8. Who we share your information with and why

We may share your information internally, and with third parties for the reasons outlined in 'Why we collect and use your information'.

We will share your information with:

- Other parts of the Aberdeen Standard Investments group and Standard Life Aberdeen plc who support us in the provision of the product or service you have
- Credit reference agencies for the purposes of conducting a credit check and ID verification
- Your advisor, trustee, business associate, professional advisor where this is required as part of the product or service you have agreed with us

- Companies we have chosen to support us in the delivery of the products and services we offer to you and other customers. For example, research, consultancy or technology companies who help us improve our service to you
- Companies who can help us in our contact with you, for example an internet service provider
- Our regulators; including the Financial Conduct Authority and the Information Commissioner's Office (the ICO) in the UK
- Law enforcement and other appointed agencies who support us (or where they request the information) in the prevention and detection of crime
- HM Revenue & Customs (HMRC) for the purposes of tax reporting where necessary.

9. Where your information is processed

Information you supply Parmenion is processed in the UK and European Economic Area (EEA).

In the event we process your information outside of the EEA, we will take additional steps to ensure that your information is protected to at least an equivalent level as would be applied by UK / EEA data privacy laws e.g. we will put in place legal agreements with our third party suppliers and do regular checks to ensure they meet these obligations.

10. How we protect your information

We take information and system security very seriously and we strive to comply with our obligations at all times. Any personal information which is collected, recorded or used in any way, whether on paper, online or any other media, will have appropriate safeguards applied in line with our data protection obligations.

Your information is protected by controls designed to minimise loss or damage through accident, negligence or deliberate actions. Our employees also protect sensitive or confidential information when storing or transmitting information electronically and must undertake annual training on this.

Our security controls are aligned to industry standards and good practice; providing a control environment that effectively manages risks to the confidentiality, integrity and availability of your information.

11. How long we keep your information

To provide your product or investment, and meet our legal and regulatory obligations, we keep your personal information and copies of records we create (e.g. calls with us) while you are a client or customer of ours.

Even when you no longer have a relationship with us, we are required to keep information for different legal and regulatory reasons. The length of time will vary and we regularly review our retention periods to make sure they comply with all laws and regulations.

12. Your rights

You have a number of rights under data protection laws which may be exercised in certain circumstances. These are:

Right to be informed about how and why we are processing your personal information

You have a right to receive clear and easy to understand information on what personal information we have, why and who we share it with – we do this in our Privacy Policy and privacy notices.

Right of access to personal information relating to you

You have the right of access to your personal information. If you wish to receive a copy of the personal information we hold on you, you may make a data subject access request (DSAR).

If you would like to submit a DSAR please contact us in writing via the contact details found above in the 'How to contact us' section.

Right to request rectification of inaccurate or incomplete personal information

If your personal information is inaccurate or incomplete, you can request that it is corrected.

Right to request erasure of your personal information

You can ask for your information to be deleted or removed if there is not a compelling reason for Aberdeen Standard Investments to continue to have it.

Right to restrict processing of your personal information

You can ask that we block or suppress the processing of your personal information for certain reasons. This means that we are still permitted to keep your information – but only to ensure we don't use it in the future for those reasons you have restricted.

Right to data portability

You can ask for a copy of your personal information for your own purposes to use across different services. In certain circumstances, you may move, copy or transfer the personal information we hold to another company in a safe and secure way.

Right to object to processing of your personal information

You can object to Parmenion processing your personal information where: it's based on our legitimate interests (including profiling); for direct marketing (including profiling); and if we were using it for scientific/historical research and statistics.

Right to not be subject to automated decision making including profiling

You have the right to ask Parmenion to:

- give you information about its processing of your personal information
- request human intervention or challenge a decision where processing is done solely by automated processes
- carry out regular checks to make sure that our automated decision making and profiling processes are working as they should

If you would like to exercise any of these rights please contact us using the details found above in the 'How to contact us' section.

13. How to make a complaint

We will always strive to collect, use and safeguard your personal information in line with data protection laws. If you do not believe we have handled your information as set out in our Privacy Policy, please let us know immediately and we will do our utmost to make things right. We can be contacted on the details found above in the 'How to contact us' section.

While we hope that we can resolve any complaints for you, you do have the option to complain to the ICO (whether or not you have exhausted our complaints procedure). The ICO's contact details are:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Telephone: 0303 123 1113

Website: www.ico.org.uk