

Parmenion

Rights of individuals

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Your rights as an Individual

Data protection law gives rights to individuals about whom we hold information, and gives us responsibilities regarding that information.

Helping you to find out what personal information we hold about you, why we hold it and who we disclose it to is fundamental to good information-handling practice.

The following information provides further details about your rights and how you can exercise those rights.

How do I exercise my right of access?

Under data protection laws, you have the right to access your personal information held by Parmenion. If you wish to enquire about the information we hold about you, you may make a **data subject access request (DSAR)** and can do so by following the process set out below

What personal information do we collect about you?

For further information please refer to our Privacy Policy which is available at [parmenion.co.uk](https://www.parmenion.co.uk).

What information are you entitled to receive?

If you make a DSAR, you are entitled to know:

- if we hold any of your personal information;
- what your personal information is used for (purpose of processing);
- the recipients or categories of recipients to whom it has been or will be disclosed, in particular third countries or international organisations;
- the envisaged period for which it will be stored or if not possible the criteria used to determine that period;
- the right to lodge a complaint with the supervisory authority (ICO)

You are entitled to receive a copy of your personal data without payment of a fee. Should you ask for further copies, we may charge a reasonable administration fee.

Only information which is considered to be your personal data will be released under a DSAR. The anonymity of other individuals or other information which is not considered to be your personal data may be protected, as appropriate, by redaction or omission in accordance with the Act.

There are exemptions which may allow us to refuse to comply with your request. Where an exemption applies to the facts of your request, we may refuse to provide all or some of the information requested, depending on the circumstances. When responding to you, the reasons will be explained.

How can I request my personal information?

You can request your personal data by making a DSAR. It will be treated in the strictest confidence and will only be processed by authorised staff.

You can submit a DSAR request verbally or in writing. To help ensure you submit a valid DSAR:

1. Include the following information:

- Your full name, address and contact telephone number;
- Any information used by us to identify or distinguish you from someone else of the same name (e.g. policy number, plan number)
- Details of the specific information you require and any relevant dates

If you wish for any specific documents to be located and/or areas to be searched this should be indicated clearly in your request. The more specific you are and the more information that you provide us with, the better we will be able to respond to your request.

You do not have to tell us why you want to see your information.

2. If requested, provide us with your proof of identity

We may require a certified copy or original of some form of photographic identification, such as a passport or a driving license. We request this information to be sure that we are releasing data to the correct person.

3. Submit your request

Written requests should be sent to:

Parmenion Capital Partners LLP
FAO Data Protection Officer
Aurora
Counterslip
Bristol
BS1 6BX

financialcrimeanddataprotection@parmenion.co.uk

What is my right to object?

Under data protection laws, you have the right to object to specific types of processing of your personal information. This is not a right to object to processing in general. You have the right to object to:

a) Processing which is for direct marketing purposes (including profiling);

In this circumstance, we must stop processing your personal information for direct marketing purposes as soon as we receive your objection. There are no exemptions or grounds to refuse.

We must deal with your objection at any time and free of charge.

b) Processing based on legitimate interests or the performance of a task in the public interest/exercise of official authority (including profiling)

You must have grounds relating to your particular situation in order to object to processing in this circumstance.

We must stop processing your personal information unless:

- We can demonstrate compelling legitimate grounds for the processing which overrides your interests;
- The processing is for the establishment, exercise or defence of legal claims.

c) Processing for purposes of scientific/historical research and statistics

You must have grounds relating to your particular situation in order to object to processing in this circumstance.

There is no fee for exercising this right.

What is my right to data portability?

Under data protection laws, you have the right to data portability. This allows you to obtain and reuse your personal information for your own purposes across different services. It allows you to move, copy or transfer personal information easily from one I.T environment to another in a safe and secure way, without hindrance to usability. Where the right applies, we must provide this in a structured, commonly used and machine readable form.

This is not an absolute right and applies in the following specific circumstances:

- To personal information provided by you to us, as a controller of that information (this extends to personal information gathered in the course of our dealings with you or generated from observations of your activity);
- When processing is carried out by automated means (i.e. this does not apply to paper records);
- Where the basis for processing your personal information is consent or for the performance of a contract.

It also must not prejudice the rights of other individuals. There is no fee for exercising this right.

What is my right not to be subject to a decision based solely on automated processing?

In particular, you have the right to not to be subject to a decision when:

- It is based on automated processing;
- It produces a legal effect or a similarly significant effect on you.

This is not an absolute right and will not apply if the decision:

- Is required for entering into or for the performance of a contract with us;
- Is authorised by law and where we consider that suitable measures are in place to safeguard your rights, freedoms and legitimate interests; (e.g. for fraud prevention);
- Is based on explicit consent.

There is no fee for exercising this right.

What is my right to rectification?

Under data protection laws, you have the right to have your personal information rectified if it is inaccurate or incomplete. If you wish to exercise this right, you can do so by following the process set out below. It will be treated in the strictest confidence and will only be processed by authorised staff.

There is no fee for exercising this right.

What is my right to withdraw consent?

Under data protection laws, you must have the right to withdraw your consent to our use of your personal information at any time and it must be as easy to withdraw your consent as it is to give it.

If you withdraw consent, we will need to stop processing your personal information as soon as possible unless we have another lawful basis processing it, for example to comply with a legal obligation.

What is my right to erasure?

Under data protection laws, you have the right to request the deletion or removal of personal information where there is no compelling reason for its continued processing.

This is **not** an absolute right and applies in the following specific circumstances:

- Where your personal information is no longer necessary in relation to the purpose of which it was originally collected or otherwise processed;
- When you withdraw your consent and there is no other legal basis for processing;
- When you object to the processing and there is no overriding legitimate interest for continuing the processing;
- When your personal information has been unlawfully processed;
- Your personal information has to be erased to comply with a legal obligation;
- Your personal information is processed in relation to the offer of information society services to a child.

If you wish to exercise this right, you can do so by following the process set out below. It will be treated in the strictest confidence and will only be processed by authorised staff.

We may refuse to comply with a request for erasure where the personal information is being processed for the following reasons:

- To exercise the right of freedom of expression and information;
- To comply with a legal obligation or for the performance of a public interest task or exercise of official authority;
- For public health purposes in the public interest;
- Archiving purposes in the public interest, scientific research historical research or statistical purposes or
- The exercise or defence of legal claims.

There is no fee for exercising this right.

What is my right to restrict processing?

Under data protection laws, you have the right to restrict the processing of your personal information. When processing is restricted, this means we are permitted to store your personal information but not further process it. We can retain just enough information about you to ensure that the restriction is respected in future.

This is **not** an absolute right and applies in the following specific circumstances:

- Where you contest the accuracy of your personal information. In this instance, we would restrict the processing until we have verified its accuracy.
- Where you have objected to the processing (based on legitimate interests), you can require the information to be restricted whilst we verify the ground for processing your personal information;
- When the processing is unlawful and you oppose erasure, requesting restriction instead;
- Where we have no further need for that information but you require the personal information to establish, exercise or defend a legal claim.

If you wish to exercise this right, you can do so by following the process set out below. It will be treated in the strictest confidence and will only be processed by authorised staff.

There is no fee for exercising this right.

How can I exercise my rights?

If you wish to exercise any of the above rights please contact Parmenion using any of the below:

Email: financialcrimeanddataprotection@parmenion.co.uk

Phone: 0345 519 0100

Post:

Parmenion Capital Partners LLP
FAO Data Protection Officer
Aurora
Counterslip
Bristol
BS1 6BX

Can I exercise these rights on someone else's behalf?

A third party can exercise these rights for you, provided that proof that they are acting with the authorisation of that individual is given.

How long will Parmenion take to respond to your request?

We will respond to your request within a reasonable timeframe, but in any event within one month of us receiving your request to allow us to deal with your request. For complex or multiple requests, we may extend the response period by two further months. We will let you know if, for any reason, we will be responding outside of the one month timescale and explain why this is.

Where we decide not to take action in response to your request, we will explain why to you. We will also inform you of your right to complain to your Supervisory Authority and to a judicial remedy.

What if I am not happy with the handling of my request?

We will always strive to meet our obligations under the data protection laws to safeguard your personal information and enable you to exercise your rights.

If you are dissatisfied with the way we do this you can raise this with our Data Protection Officer. Our Complaints Policy is available at parmenion.co.uk

If you remain dissatisfied you may wish to raise this with your Supervisory Authority. We have provided their details below:

UK – ICO ico.org.uk/global/contact-us

How do I find out more about exercising these rights?

The ico.org.uk/for-the-public provides useful information.

Get in touch

If you'd like to chat to us about the contents of this document, please get in touch.

Phone:

0345 519 0100

Email:

mail@parmenion.co.uk

Parmenion

Registered office: Aurora,
Counterslip, Bristol BS1 6BX.

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Financial Conduct Authority.

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