

Parmenion

Privacy Notice

September 2023

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1. Introduction

- 1.1.** Parmenion Capital Partners LLP is committed to protecting your personal information.
- 1.2.** This Privacy Notice contains 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.
- 1.3.** We may change our Privacy Notice so please check our website for updates from time to time. If we make particularly significant changes, we will contact you to let you know.
- 1.4.** Our Cookie Policy forms part of our Privacy Notice. When you browse our websites, we use cookies to store information about how you use these websites to improve the quality of service provided to you. To understand the types of cookies we use and how these work when you use our websites, you can access our Cookie Policy here parmenion.co.uk/security-centre/cookies/.
- 1.5.** This version of our Privacy Notice was last updated September 2023.

2. Who we are

- 2.1.** This Privacy Notice applies to personal data processed by Parmenion Capital Partners LLP.

3. How to contact us

- 3.1.** If you have any questions about our Privacy Notice or the information we collect or use about you, please contact:

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

Telephone: 0345 519 0100

E-mail: financialcrimeanddataprotection@parmenion.co.uk

4. Information we collect and use

- 4.1.** 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 we automatically collect, e.g., via cookies when you visit one of our websites.
- Information classified as ‘sensitive’ personal information, e.g., relating to your health.

4.2. Children are not able to buy products and services from us. However, on instruction from a parent or guardian, a child can 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 and date of birth).

4.3. Where we collect and use sensitive personal information, this information will only be collected and used where this is necessary to comply with or in the exercise of our legal obligations, to protect your vital interests in those rare circumstances where you can't give consent, or where we have obtained your explicit consent to process such information for a particular purpose.

5. Where we collect your information

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

- An application form for a product or service.
- Phone conversations with us.
- E-mails 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 an event which we are sponsoring.
- Our online services such as websites, social media, and mobile device applications (‘Apps’).
- From advisers enacting a transition from another service provider

5.2. If you have a financial adviser, they will provide us with your information on your behalf.

5.3. 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

6.1. 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 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 financial crime.
- It's in the legitimate interests of Parmenion. Examples include:
 - 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 your adviser has provided us your information so we may contact you to facilitate the transfer your adviser has instructed from another service provider

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, unnecessary, or adversely impacts your individual rights and freedoms.

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.

- You have given us your 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 marketing.

6.2. Where we process personal information with your consent and you no longer wish us to collect and use this personal information, you can withdraw consent at any time via the contact details found above in the **How to contact us** section.

7. Marketing and analytics

7.1. Where you have given your consent to do so, we will send you information from Parmenion Capital Partners LLP about products and services offered by Parmenion Capital Partners LLP, as well as our partners with whom we have entered into sponsorship arrangements or similar partnering arrangements.

7.2. 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.

7.3. We sometimes use systems to make automated decisions based on personal information 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

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

8.2. We may share your information with:

- Credit reference agencies for the purposes of conducting a credit check and ID verification.
- Your advisor, trustee, business associate, professional advisor where required as part of the product or service you have agreed with us.
- Your Discretionary Fund Manager (DFM) to provide the service requested, where you have chosen a third party DFM
- Your employer or specified third party, when they require information about your investments to allow them to comply with their regulatory obligations, and only where you have given us your explicit consent.
- 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

9.1. Usually we process your information in the UK. However, sometimes third parties we work with may process your information in countries outside of the UK, for example Amazon Connect / Web Services (Parmenion's telephony provider) processes personal data in the European Economic Area.

9.2. Where your information is processed outside of the UK, we take additional steps to ensure that your information is protected to at least an equivalent level as would be applied by UK Data Protection Laws, e.g., we will put in place legal agreements with third parties with ongoing oversight to ensure they meet these obligations.

10. How we protect your information

10.1. We take information and system security very seriously and we strive to always comply with our obligations. Any personal information 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.

10.2. We protect your information with controls designed to minimise loss or damage through accident, negligence, or deliberate actions. We also protect sensitive or confidential information when storing or transmitting information electronically. Our employees undertake regular training on how to protect your information.

10.3. Our security controls align 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

11.1. 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.

11.2. Even when you no longer have a relationship with us, we are obligated 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

12.1. You have statutory rights under data protection laws which you may exercise 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 process and why and who we share it with via this Privacy Notice

Right of access to personal information relating to you

- You have the right of access to your information. If you wish to receive a copy of the 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 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 information is inaccurate or incomplete, you can request that we correct it.

Right to request erasure of your personal information

- You can ask us to delete your information where we no longer need it for the purposes we collected it. Where we use that information in pursuance of a legitimate interest, will we delete the information unless there is a compelling reason to continue to process it.
- We may not be able to erase your information where we are processing it for certain reasons, such as to comply with our legal and regulatory obligations.

Right to restrict processing of your personal information

- You can ask that we block or limit the extent of our processing of your information, for reasons you specify. We will ensure we do not process it in future for those reasons.
- We may not be able to apply the requested restriction in certain circumstances, such as where the processing is necessary to comply with our legal and regulatory obligations.

Right to data portability

- Where technically feasible, you can ask us for a copy of your information you have previously provided to us which we hold electronically. We will send you this in a structured, commonly used, and machine-readable format (e.g. csv file),
- You can also ask us to transfer your information to another organisation directly.
- This right only applies to information we process where it is necessary to provide the product or service you have requested, or where we rely on your consent.

Right to object to processing of your personal information

- You can object our processing of your information for direct marketing purposes.

- You can also object in certain circumstances where we process your information based on your legitimate interests, or the legitimate interest of another party, and there is no compelling reason for this to continue.

Right to not be subject to automated decision-making including profiling

You have the right to ask Parmenion to:

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

12.2. 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

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

13.2. While we hope that we can resolve any complaints for you, you do have the option to complain to the ICO regardless of whether 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: ico.org.uk

Where possible, the ICO ask that you contact them online and do not correspond by post.

Get in touch

If you'd like to chat to us about our privacy notice, please get in touch.

Phone:

0345 519 0100

Email:

mail@parmenion.co.uk

Parmenion

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

Website: www.parmenion.co.uk

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