

Parmenion

Privacy policy

June 2022

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1. Introduction

- 1.1.** Parmenion Capital Partners LLP is committed to protecting your personal information.
- 1.2.** 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.
- 1.3.** 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.
- 1.4.** 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 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 Policy was last updated June 2022.

2. Who we are

- 2.1.** This Privacy Policy applies to Parmenion Capital Partners LLP.

3. How to contact us

- 3.1.** If you have any questions about our Privacy Policy 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 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.

4.2. 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 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’).

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

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 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

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 this is required as part of the product or service you have agreed with us.
- Your Discretionary Fund Manager (DFM) in order 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. The majority of your information is processed in the UK. However, some of your information may be processed by us or the third parties we work with 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 being 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 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.

10.2. 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.

10.3. 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

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 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

12.1. 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 where it is no longer needed for the purposes for which it was collected. Where we use that information in pursuance of a legitimate interest, the information will be deleted or removed unless there is a compelling reason for us 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 and there is no compelling reason for this to continue, is for direct marketing (including profiling) or 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.

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 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.

13.2. 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: 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 policy, 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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