



Privacy Notice

September 2019

This privacy notice has been prepared on behalf of Halkin Investments LLP. It explains how we use any personal data we collect about you.

To whom does this notice apply?

This notice applies to you if you are an individual customer, their family member, their associate or their authorised person. It applies to you if you are a person associated with a corporate customer (such as a director, beneficial owner or authorised signatory of an IFA, intermediary or other corporate vehicle), or if you are a partner of a partnership. It also applies to you if you are a person associated with a trust or pension vehicle (such as a trustee, settlor, protector or beneficiary). Also if you are a consultant, introducer, suppliers, ex-employee or for that effect, any other individual that has been engaged with the organization in a business or personal capacity, now or in the past.

This notice also applies to prospective customers and persons who have asked to receive our promotional or other material.

What personal data do we collect about you and why?

We collect personal data via our account application process and throughout our relationship with you.

We collect and use personal data on the basis that it enables us to perform our contract with you or because it is in our legitimate interests to do so or because we are required to do so by regulation, for example to provide a service to our customers and to keep records of transactions. The provision of information for marketing purposes is entirely voluntary and requires your explicit consent.

We may record and monitor phone calls made to or by us in order to comply with regulatory obligations. All our decisions are checked by persons, including those relating to our Know Your Customer/Anti- Money Laundering checks or to ensure that Halkin Investments LLP (herein referred to as "Halkin") is providing a

suitable and appropriate service to you. We do not use any automated decision- making in providing services to you.

We also collect personal data you provide when filling in one of our online enquiry forms and we will use this to keep you updated about Halkin activities and services. During the course of our relationship, you may disclose details about your health including your mental health which may be relevant to our provision of services to you. For certain information, we may require your consent to process it. Where we ask for your consent and you do not give it, this may limit our ability to provide products and services to you.

Examples of Personal data we collect on you are as follows; full name, address, date of birth, gender, business relationships, ownerships, nationalities, source of wealth, education and investment related experience, transactional history, occupation, relationship status, contact number and email addresses, these are examples of the information that Halkin may collect.

Where do we obtain personal data about you?

We process personal data that you provide to us directly and personal data we obtain about you from our communications and dealings with you.

We may also obtain some personal data from third parties, including:

- an existing client, such as an individual or institutional client or prospective client you are associated with; or
- fraud prevention agencies, professional background checking entities, international sanctions lists or any public databases or data sources.

How long do we keep personal data?

If you are a customer, we are processing your personal data in connection with performing our contract with you. If you are an associate of a customer, we are processing your personal

data in connection with performing our contract with our customer. We keep your personal data for as long as is required in order to fulfil our contractual, regulatory or legal obligations. We may also retain personal data to establish, exercise or defend any legal claims and in order to protect and enforce Halkin's rights for as long as is reasonably necessary and any personal data may be disclosed to the courts, regulators and/or other relevant authorities. If you are a prospective customer, we will keep your information for a year after we last heard from you. If you have contacted us to receive our marketing or other material, you can unsubscribe from these at any time. If you ask us to remove you from our marketing list, we may keep your personal details on an "opted-out" list in order to ensure that we do not market to you again.

If you are or were a customer or an associate of a customer, we will keep most of your information for five (5) years after the closure of your account unless there is a regulatory or legal requirement to keep it for longer. We keep recordings of telephone conversations with you and these will be held for up to five (5) years after they took place unless there is a legal or regulatory requirement to keep them for longer.

Who do we share your personal data with?

We may share your personal data with the following entities:

- our counterparties (including banks, custodians, sub-custodians, brokers, settlement agents, stock exchanges);
- providers of investment products or services, including offshore bonds, onshore bonds, trusts, investment platforms, fund administrators, SIPP administrators, issuers of securities or other such products or services. We may also be required to share information with the auditors appointed by the providers of such products or services;
- our IT providers and service providers in order to provide and maintain the provision of our services;

- our appointed auditors, accountants, lawyers, and other professional advisers, to the extent that they require access to the information to provide advice or perform their services to us;
- our insurers, including any re-insurers and our insurance brokers;
- fraud prevention agencies, screening agencies and other organisations to allow us to undertake relevant checks;
- the Financial Conduct Authority or any other country's regulatory authorities depending on the jurisdiction where your account is administered;
- the Information Commissioner's Office in the UK or any relevant regulatory authority where they are entitled to require disclosure;
- if required to do so to meet applicable law, the order of a Court or market rules and codes of practice applicable to the circumstances at the time;
- relevant authorities to investigate or prevent fraud or activities believed to be illegal or otherwise in breach of applicable law;
- if tax regulations require us to collect information about tax residency, then in certain circumstances (including if we do not receive a valid self-certification from you), we may be obliged to share information about your account with the relevant tax, payments and customs authority, who may pass this on to tax authorities in other jurisdictions;
- in the event that we sell or buy any business or assets, in which case we will disclose your personal information to the prospective seller or buyer of such business or assets;
- other companies within Halkin's Group; or
- if some or all of Halkin's assets are acquired by a third party, in which case personal information held by us about our clients may be one of the transferred assets.

We will not sell your personal data to third parties and we will only share your data with third parties where this is permitted by law.

Where do we transfer your personal data?

Your personal information may need to be shared with our service providers, which may involve transferring it to countries outside the European Economic Area (EEA). Certain jurisdictions benefit from a European Commission adequacy decision. Where no such adequacy decision exists, we will ensure that we do this in accordance with current data protection legislation. Such transfers are permitted where it is required for the performance of our contract with you or where we have your consent to transfer it. Where possible, we will use model clauses which have

been approved by the European Commission or other available safeguards

Marketing and communications

If you agree, we may send you information about new products and services which do not relate to the products or services which you currently receive from us. If you have consented to receive marketing, you may still easily opt out at a later date. We may use your contact details to send you invitations to events and investment commentaries, updates or other communications which are relevant to the products or services which you receive from Halkin and which are considered to be part of the service we offer you. We may also invite you to participate in satisfaction surveys so that we can ensure that our services meet your expectations.

You have the right at any time to stop us from contacting you for marketing purposes and to opt out of other communications. If you no longer wish to be contacted for marketing purposes or you wish to opt out of other communications which you receive as part of your service, please use the unsubscribe button on each communication, or email us at info@halkininvestments.com or write to us using the details at the end of this notice.

Your rights

You have certain rights in respect of the data we hold relating to you. Details of these rights can also be found online, for example on the Information Commissioner's website in the UK or any other regulatory entity's website as applicable. You are entitled to a copy of the personal data we hold on you in a portable format or otherwise, to request rectification, erasure, or restriction of processing of your personal data, and to object to processing. Please note that the application of these rights vary according to the legal basis used to process your data. In certain circumstances we are required to retain copies of information we hold about you by other regulations. In this instance we will not be able to erase or modify the data.

In order to exercise these rights or if you have any concerns about our use of your personal information, please contact us using the information at the end of this notice. You can also contact the Information Commissioner's Office in the UK or any other regulatory entity's website as applicable.

We will endeavour to keep your personal data accurate, however, if at any time after giving us this information it becomes out of date, then we ask you to notify us directly and we shall remove or amend the information within a reasonable time frame and in accordance with legislative requirements.

Security

We have implemented appropriate measures to keep your personal data secure and

confidential. Internet communication, which includes email, is not secure. We cannot accept any responsibility for unauthorised access by a third party or for the loss, theft or modification of data while it is being sent to us by email. For security purposes we may monitor emails received or issued by us. For information regarding our use of cookies, please see our Privacy Policy, which may be viewed online at the Halkin's website.

Other websites

Our website may contain links to other websites. This privacy notice only applies to our website. When you use a link to another website you should read the privacy policy of that site.

Changes to our Privacy Notice

The extended version of this Privacy Notice can be found in our website at www.halkininvestments.com. We keep our privacy notice under regular review. This privacy notice was last updated in May 2018. We reserve the right to update this privacy notice at any time and we will advise you when we make any substantial update to it.

How to contact us

If you have any questions about our privacy notice or the personal data we hold about you please contact us at the address below:

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