

Privacy Notice

Data Protection laws in the United Kingdom are governed by UK General Data Protection Regulation (UK GDPR), tailored by the Data Protection Act 2018. The aim of UK GDPR is to improve the protection of your personal data that, directly or indirectly, identifies you. It also gives you greater control over your personal data and introduces greater transparency so that you know how your personal data is used.

This notice describes the personal data that we collect and hold, how we use that data and your rights in relation to the processing of that data.

1. Who we are

In this Privacy Notice when we say “we”, “us” or “Altus” we mean Altus Investment Management Ltd, a company registered in England and Wales with its registered address at 35 Grosvenor Street, London, W1K 4QX with company number 04940982.

For the purposes of data protection laws, Altus Investment Management Ltd is the controller of your data. We are registered as a data controller with the Office of the Information Commissioner. You can search for our registration details at <https://ico.org.uk/esdwebpages/search>

2. How we collect personal data

We may collect data in a number of ways including:

- a) when you complete our account opening forms;
- b) through your direct contact with us;
- c) from third parties e.g. introducers, lawyers, financial advisors;
- d) from public sources e.g. Companies House, the Worldcheck database;
- e) through recording of telephone calls; and
- f) through your use of our website.

3. What personal data do we collect?

In order to carry out the services we provide for you we need to collect certain personal data from you. We have a duty only to use it for the purposes intended. We collect the following types of information:

- a) personal details such as date of birth, contact details, nationality, tax details, employment, family and dependants;

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- b) information on your financial situation such as income and expenditure, assets and liabilities, bank details, family background and source of wealth, including documents such as tax returns, bank statements, share certificates and company accounts, investment objectives and risk profile;
- c) information arising from our dealings with you such as recordings of telephone calls, records of other correspondence/meetings, details of your account activity;
- d) documentation provided to confirm your identity including passports and utility bills; and
- e) IP address and cookies collected if you visit our website (see our Cookie Policy below).

4. How we use your data

Your personal data may be stored and used by us in the following ways:

- a) to verify your identity and verify the accuracy of the data you have provided to us, including carrying out background and credit checks. We may use credit reference agencies to do this and they may record that a search has been made and share the results with other organisations;
- b) to enable us to provide services to you;
- c) to communicate with you in the course of providing services to you and to respond to requests for information from you and to send details of other products and services available from us to you;
- d) to comply with any requirement of any applicable statute, regulation and/or the rules of the Financial Conduct Authority;
- e) to fulfil our obligations under any reporting agreement entered into with any tax authority or revenue service(s);
- f) for our own administrative purposes, including maintaining our records;
- g) for compliance purposes, including crime prevention and detection; and
- h) where you give us your specific consent to the use and/or processing of such personal data.

5. Who we share your data with?

We will not provide your personal data to third party organisations to use for their own marketing purposes.

Altus is committed to safeguarding your privacy but there are circumstances in which we may disclose your personal data outside of our organisation in order to carry out our services or fulfil legal or regulatory obligations including:

- a) to other organisations that we engage to assist in the fulfilment of our services, for example to carry out enhanced due diligence or to advise us on legal, compliance or tax matters or provide essential IT services. We shall endeavour to ensure that any such organisation is required to have in place appropriate confidentiality and security measures in respect of your personal data; and
- b) in circumstances in which we may be required or authorised by law, court order, regulatory or governmental authorities to disclose your personal data.

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In the above circumstances it is possible that personal data in our possession may be transferred to other countries, including countries outside the UK which will not be subject to the General Data Protection Regulation, but we will endeavour to ensure that your information is processed in accordance with applicable data protection legislative requirements.

6. How we protect your data

We have in place stringent security measures to protect your data against loss, destruction or unauthorised use or access. These include ensuring that:

- a) any service provider has sufficient security guarantees in relation to any data processing it undertakes on our behalf;
- b) we have secure IT systems and physical security measures in the office;
- c) an adequate level of protection is achieved in relation to any transfer of your personal data outside the UK; and
- d) we have a disaster recovery plan to restore your data in situations where clients' data may be corrupted or lost.

7. How long do we keep your data?

The period for which we retain your data will vary according to the type of data as follows:

- a) if an application for a client account is rejected by us or you do not proceed with the application, your information is retained for a period determined by us based on the factors below before it is reviewed and securely deleted;
- b) if you are not a client of ours, your contact details are held until you notify us that you no longer wish to remain on our mailing list;
- c) where you have ceased to be a client, your information is retained for a period determined by us based on the factors below before it is reviewed and securely deleted by us; and
- d) telephone recordings will be kept for five years or, if required by order of the FCA for up to seven years.

In b) and d) above, where you give your consent, we may retain contact details for you for the purposes of providing promotional material to you in the future.

When determining the period for retaining your data, we consider various factors including:

- 1) whether there are any existing obligations we may owe you or you may owe us;
- 2) whether you require any follow-up communications;
- 3) the likelihood for potential or actual disputes;
- 4) legal or regulatory obligation(s) under applicable law to retain data for a certain period of time; and
- 5) guidelines issued by relevant data protection authorities.

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8. Your rights as a data subject

You have the following rights regarding your data:

- Right to be informed, you have the right to be provided with concise, transparent and intelligible information about the types of data we collect and how we use it, as well as your rights as a data subject.
- Right of access, you have the right to receive a copy of the personal data that we hold about you in order to understand how and why we use your data and to check that we are doing it lawfully. You can make such a 'subject access request' verbally or in writing to which we are obliged to respond within one month and for which we can (usually) charge no fee.
- Right to rectification, you are entitled to have your data corrected if it is inaccurate or incomplete. If you tell us verbally or in writing that the data we hold on you is incorrect, we will review it and if we agree with you, we will correct our records. If we do not agree with you we will inform you of our decision within one month. You then have the right to make a complaint to the Information Commissioner's Office and to seek to enforce the right through a judicial remedy.
- Right to erasure, this is also known as 'the right to be forgotten', which enables you to request the deletion or removal of your data where there is no compelling reason for us to retain it. This right is not absolute, for example, we have the right to continue using your data if such usage is necessary for compliance with our legal obligations. Where we decide to refuse your request we must inform you of our decision within one month and you have the same rights to make a complaint or seek a judicial remedy as mentioned in c) above.
- Right to restrict processing, you have the right to 'block' or suppress further use of your data in certain circumstances, for example, where you think the data we are using about you is inaccurate, and while we are in the process of verifying its accuracy. When processing is restricted, we can still store your data, but may not use it further.
- Right to data portability, you have the right to obtain and reuse your data in a structured, commonly used and machine-readable format in certain circumstances. It applies when we use your data on certain legal grounds, e.g. consent or for the performance of a contract, it doesn't apply where it is necessary for us to process data for our own legitimate purposes. It only applies to data that you have provided to us and not to additional data created by us and it does not apply to paper files. In addition, where certain conditions apply, you have the right to have such information transferred directly to a third party.
- Right to object to the processing of data, you have an absolute right to object to processing of data used for direct marketing. You have a non-absolute right to object to the processing of your data in circumstances where the basis for processing is our legitimate interest.
- Right to withdraw consent to processing, if you have given your consent to us to collect, process or transfer your data for a particular purpose, you have the right to withdraw your consent at any time (although if you do so, it does not mean that any use of your data up to that point is unlawful).

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- Right to make a complaint to the data protection authorities, you have the right to make a complaint to the Information Commissioner's Office if you are unhappy with how we have handled your data or believe our use of your data does not comply with data protection law

If you wish to exercise any of these rights, you should contact us at the address below.

9. How to make a complaint

If you want to make a complaint about how we have handled your information, please contact the Compliance Officer at:

Altus Investment Management Ltd
35 Grosvenor Street
London
W1K 4QX

If you are not satisfied with our response to your complaint or believe our processing of your information does not comply with data protection law, you can make a complaint to the Information Commissioner's Office (ICO) in the following ways:

- a) in writing to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF;
- b) by telephone: 0303 123 1113; or
- c) by submitting a message through the ICO's website at: www.ico.org.uk.

10. How to contact us

You can contact us by writing to us at:

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or by email at: contact@altusinvestment.com.

Cookie Policy

We use cookies on our website. Cookies are text files containing small amounts of information which are downloaded to your device when you visit a website. Cookies are then sent back to the originating

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website on each subsequent visit, or to another website that recognises that cookie. Cookies are useful because they allow a website to recognise a user's device. You can find more information about cookies at: www.allaboutcookies.org.

Our website only creates two cookies and these cookies are strictly necessary cookies, this means that they are essential to enable you to move around the website and use its features.

Cookie Names: ASP.NET_SessionId and JSESSIONID

These cookies expire at the end of the session, which is when a visitor moves to another website or closes their browser window. Because the cookie does not remain on your computer it has no way of tracking your website usage or retaining any of your data post expiry.

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