

## Privacy Policy

OAKSMORE PORTFOLIOS AIFM LIMITED ("Oaksmore", "we", "us" or "our") is committed to protecting and respecting your personal information and your privacy.

This privacy policy (together with our Terms and Conditions and any other documents referred to it) describes how we will collect, store and use personal information through our website at [www.oaksmore-isa.co.uk](http://www.oaksmore-isa.co.uk) ("Website"). This privacy policy also sets out your rights in relation to the personal information which we hold about you.

Please read this privacy policy carefully to understand our practices regarding your personal information and how we will treat it.

By accessing or browsing the Website and/or using any of the services that we may provide to you, you confirm that you have read and understood the entirety of this privacy policy and that you accept and consent to the practices described in this privacy policy. You must not use the Website unless you agree with all of the terms of this privacy policy.

### 1. About us

1.1 For the purposes of the Data Protection Act 1998 (the "Act"), the data controller is OAKSMORE PORTFOLIOS AIFM LIMITED. We are registered with the Information Commissioner's Office with registration number: ZA225464

1.2 OAKSMORE PORTFOLIOS AIFM LIMITED is a company registered in England and Wales (registration number 10231997), whose registered office is at 1 Northumberland Avenue, London, England, WC2N 5BW. OAKSMORE PORTFOLIOS AIFM LIMITED is authorised and regulated by the Financial Conduct Authority.

1.3 We will only process personal information in accordance with the Act, the Privacy and Electronic Communications (EC Directive) Regulations 2003 and any other applicable privacy laws.

1.4 If you have any questions in relation to this privacy policy or how we collect, use or store your personal information, you can contact us by post at: OAKSMORE PORTFOLIOS AIFM LIMITED, Oaksmore ISA, Gallium House, Unit 2, Station Court, Borough Green, Sevenoaks, Kent, TN15 8AD

### 2. Which personal information will we collect?

We may collect and process any of the following information about you:

2.1 Information you give us. You may give us information about yourself by using the online forms provided on the Website or by corresponding with us by phone, e-mail or otherwise. This includes, without limitation, information you provide when you sign-up and register to use the Website, enter into a deal via the Website, ask a question via the Website, participate in discussion boards or other social media functions on the Website and/or when you report a problem with the Website or our services.

The information you give us may include:

- (a) your name;
- (b) your date of birth;
- (c) your current and (where necessary) previous postal address;
- (d) your telephone number and email address; and
- (e) your bank or building society account details and credit or debit card information.

Please note that certain categories of information are mandatory in order to register for a OAKSMORE PORTFOLIOS AIFM LIMITED account and to use our services. We may collect and process further personal information if you update any information on your account.

2.2 Information we collect about you. Each time you visit the Website we may automatically collect any of the following information:

(a) technical information, including the Internet protocol (IP) address used to connect your computer to the internet, your login information, browser type and version, browser plug-in types and versions, operating system and platform; and

(b) information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our site (including date and time), length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs) and methods used to browse away from the page.

2.3 Information we receive from other sources. We may receive information about you if you use any of the other websites we operate or the other services we provide. In this case we will have informed you when we collected that data that it may be shared internally and combined with data collected on the Website. We work closely with third parties (including, for example, business partners, suppliers of technical and payment processing services, advertising networks, analytics and search information providers and credit reference agencies) and may receive information about you from them.

### **3. How will your personal information be stored and used?**

3.1 We, or third party data processors acting on our behalf, may collect, use and store the personal information listed above for the following reasons:

(d) analytics and search engine providers that assist us in the improvement and optimisation of our site; and

(a) to allow you to access and use the Website and to register for an online account;

(e) members of any marketing group we belong to.

(b) to provide you with content which is tailored specifically to you;

(c) to provide you with the information and services that you request from us;

(d) to enable you to make applications to become either an investor or developer;

(e) to verify your identity in order to prevent and detect money laundering and fraud;

(f) to carry out credit reference checks and other regulatory checks;

(g) to carry out statistical analysis and market research;

(h) for marketing, advertising and promotional purposes;

(i) to notify you about changes to our services and to keep you informed about our fees and charges;

(j) with your consent only, to contact you (including by email or post) with information about our products and services which either you request, or which we feel will be of interest to you; and

(k) with your consent only, to disclose your personal information to carefully selected third parties, so that they might contact you (including by email or post) with information about products and services which may be of interest to you.

3.2 We may also collect details about you as a user of the Website for the purposes of preparing reports or compiling statistics. Such details will be anonymised and you will not be identifiable from the data collected.

#### **4. Disclosure of your personal information**

4.1 We may share your personal information with any company that is a member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 1159 of the UK Companies Act 2006.

4.2 Unless you have indicated that you do not wish us to do so, we may share your personal information with selected third parties, including:

- (a) our service providers and sub-contractors, including but not limited to card payment and direct debit payment processors, suppliers of technical and support services and companies that assist us in carrying out identification and fraud checks;
- (b) credit reference agencies for the purpose of assessing your credit score, where this is a condition of us entering into a contract with you;
- (c) companies that assist us in our marketing, advertising and promotional activities;

Any third parties with whom we share your personal information are limited (by law and by contract) in their ability to use your personal information for any purpose other than to provide services for us. We will always ensure that any third parties with whom we share your personal information are subject to privacy and security obligations consistent with this privacy policy and applicable laws.

4.3 We may also disclose your personal information to third parties:

- (a) in the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets;
- (b) if OAKSMORE PORTFOLIOS AIFM LIMITED or substantially all of its assets are acquired by a third party, in which case personal information held by OAKSMORE PORTFOLIOS AIFM LIMITED will be one of the transferred assets;
- (c) if we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms and conditions or any other agreement; or
- (d) to protect the rights, property, or safety of OAKSMORE PORTFOLIOS AIFM LIMITED, our customers, or other persons. This may include exchanging information with other organisations for the purposes of fraud protection and credit risk reduction.

4.4 Save as expressly detailed above, we will never share, sell or rent any of your personal information to any third party without your consent. Where you have given your consent for us to share your information, but later change your mind, you should contact us and we will stop doing so.

#### **5. Your rights**

5.1 The Act gives you certain rights in relation to personal information held about you. You may contact us by post or email at any time, to request that we:

- (a) update any out of date or incorrect personal information which we are holding about you; or
- (b) provide you with copies of any personal information which we hold about you, subject to a fee specified by law.

5.2 You have the right to ask us to not process your personal information for marketing purposes. We will inform you (before collecting your personal information) if we intend to use your personal

information for such purposes or if we intend to disclose your information to any third party for such purposes. You can exercise your right to prevent such processing by checking certain boxes on the forms we use to collect your personal information. Alternatively, you can contact us by post or email at any time.

5.3 If you have previously given your consent to the use of your personal information for marketing purposes, you can choose to stop receiving marketing communications which we send to you from time to time by following the unsubscribe instructions included in such communications. Alternatively, you can opt out of such communications at any time by contacting us by post or email.

## **6. Transfers of personal information**

6.1 The personal information that we collect from you may be transferred to, and stored at, a destination outside of the European Economic Area ("EEA"). It may also be processed by staff operating outside the EEA working for us, other members of our group or third party data processors. Such staff may be engaged in, among other things, the provision of our services to you, the processing of transactions and/or the provision of support services. By providing us with your personal information you acknowledge and consent to any such transfer, storage and processing.

6.2 We will always take steps to ensure that such transfers comply with applicable privacy laws and we will take all reasonable precautions to ensure that your personal information is treated securely and in accordance with this privacy policy. However, you should be aware that countries outside the EEA may not offer the same level of protection for personal information as the United Kingdom.

## **7. Security of data**

7.1 All information you provide to us is stored on our secure servers. Payment transactions may be undertaken by third party service providers and will be encrypted using industry standard SSL technology. Where we have given you (or where you have chosen) a password which enables you to access your online account, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

7.2 We follow generally accepted industry standards to protect the personal information submitted to us, both during transmission and once we receive it. Although we make every effort to protect the personal information which you provide to us, the transmission of data over the internet is not completely secure. As such, you acknowledge and accept that we cannot guarantee the security of your information transmitted to the Website and that any such transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to prevent unauthorised access.

## **8. Third party websites**

The Website may, from time to time, contain links to websites operated by third parties. Please note that this privacy policy only applies to the personal information that we collect through this Website and we cannot be responsible for personal information collected and stored by third parties. Third party websites have their own terms and conditions and privacy policies, and you should read these carefully before you submit any personal information to these websites. We do not accept any responsibility or liability for third party terms and conditions or policies.

## **9. Cookies**

9.1 Our Website uses cookies, which are small files placed on your internet browser when you visit our Website. We use cookies in order to offer you a more tailored experience in the future, by understanding and remembering your particular browsing preferences.

9.2 For detailed information on the cookies we use and the purposes for which we use them, please refer to our Cookies Policy. By continuing to use the Website and/or our services, you are agreeing to our use of cookies as described in our Cookies Policy.

## 10. Changes to our privacy policy

We may update our privacy policy from time to time. By continuing to use the services and our Website, you agree to the latest version of our privacy policy. Any changes we make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by email. Please check back frequently to see any updates or changes to our privacy policy.

## Cookies Policy

OAKSMORE PORTFOLIOS AIFM LIMITED ("Oaksmore", "we", "us" or "our") is committed to protecting and respecting your personal information and your privacy.

This cookies policy explains what cookies are, how we use cookies and similar technologies on our website at [www.oaksmore-isa.co.uk](http://www.oaksmore-isa.co.uk) ("Website"), and what you can do to manage how cookies are used.

By continuing to browse the Website, you are agreeing to our use of cookies as described in this cookies policy.

If you have any questions in relation to this cookies policy or if you would like more information on the cookies that we use and their purposes, you can contact us by phone at: 020 3904 0972 by post at: OAKSMORE PORTFOLIOS AIFM LIMITED, Oaksmore ISA, Gallium House, Unit 2, Station Court, Borough Green, Sevenoaks, Kent, TN15 8AD

### 1. What are cookies and why do we use cookies?

1.1 Cookies are small data files which are placed on your computer or mobile phone ("device") when you visit our Website. Cookies will collect information relating to your use of our Website, information about your device such as IP address and browser type, demographic data and, if you reached the Website through a third party website, which third party website directed you to the Website.

1.2 When you re-visit our Website, cookies allow our Website to recognise you, remember your preferences and tailor your use of the Website. Information provided by cookies can help us to analyse your use of our Website and help us to provide you with a better user experience.

1.3 Cookies are referred to as either "session" or "persistent" cookies, depending on how long they are used for:

(a) Session cookies only last for the duration your online session and disappear from your device when you close your browser. Session cookies are not stored on the hard drive of your device.

(b) Persistent cookies are stored on the hard drive of your device after the browser has been closed and last until you delete them or they reach their expiry date. Persistent cookies are activated each time you visit the site where the cookie was generated.

1.4 For more information, please see [www.allaboutcookies.org](http://www.allaboutcookies.org).

### 2. What types of cookies do we use?

2.1 The types of cookies that may be used on our Website fall into one of four categories as follows:

(a) 'Strictly Necessary' cookies. These cookies are essential for the operation of our Website and enable you to access certain features. Without these cookies, we would be unable to provide you

with the online services you request. These cookies do not track where you have been on the internet and do not gather information about you that could be used for marketing purposes.

(b) Functional cookies. Functional cookies are used to recognise you when you return to our Website. They also remember your preferences (such as your username, language and region) on our Website and enable us to personalise our content for you. The information collected by these cookies is usually anonymised, so we cannot identify you personally. Functional cookies do not track your internet usage or gather information which could be used for selling advertising, but they do help with serving advertising.

(c) Analytical cookies. Analytical cookies are used to monitor the performance of our Website. For example, they allow us to recognise and count the number of visitors and to see how visitors move around our Website when they are using it. The information provided by these cookies allows us to analyse patterns of user behaviour and we use that information to enhance user experience or identify areas of the Website which may require maintenance. All of the information collected by these cookies is anonymous and is only used for statistical purposes.

(d) Targeting cookies. These cookies may be placed on your device by us or by trusted third parties. They remember that you have visited our Website and use that information to provide you with advertising which is tailored to your interests. This is often called online behavioural advertising (OBA) and involves the monitoring of interests based upon web browsing history. Your web browsing history can be used to infer things about you (for example, your age, gender etc.), and this information may also be used to make advertising on websites more relevant to you. Although behavioural advertising cookies can track your activity around the internet they cannot identify you personally, even if you are signed in to our Website. Without these cookies, online advertisements you encounter will be less relevant to you and your interests. If you would like more information about OBA, including how to opt-out of these cookies, please visit [www.youronlinechoices.com](http://www.youronlinechoices.com).

2.2 Our emails may contain a web beacon to track whether you open an email and if you click on any of the links in the email. We may use this information to help us analyse the types of topics that you are interested in and to let our advertisers know how many of our anonymised, aggregated users click on their advertisements. When you delete the email, the web beacon will be deleted. If you do not wish to receive these web beacons, you can choose to receive emails from us in plain text rather than HTML.

2.3 When you browse our Website some cookies may be set by third parties, over which we have no control. When you

visit a page with embedded third party content, the service provider may set their own cookies on your device. You may also encounter third party cookies resulting from our use of third party services, which help us monitor traffic on our Website. We do not control the use of these cookies and you should refer to the relevant third party websites for more information.

### **3. How can I manage or disable cookies?**

3.1 There are a number of ways for you to manage cookies.

Your browser settings should allow you to accept or reject cookies and you can set your browser to prompt you before accepting a cookie.

3.2 You can delete any cookies that have been installed in the cookie folder of your browser. The various browsers provide different procedures to manage your settings.

3.3 Please be aware that if you set your browser to disable cookies entirely it may affect the way our Website operates and you may not be able to use certain features of our Website.

### **4. Further information**



If you have any queries relating to this Cookie Policy please write to us at OAKSMORE PORTFOLIOS AIFM LIMITED, Oaksmore ISA, Gallium House, Unit 2, Station Court, Borough Green, Sevenoaks, Kent, TN15 8AD