

## PRIVACY POLICY

### BACKGROUND:

Oaksmore Portfolios AIFM Limited understands that your privacy is important to you and that you care about how your personal data is used. For the purposes of the Data Protection Act 2018 and the EU General Data Protection Regulation (GDPR), we are a controller of your personal data. We respect and value the privacy of everyone who visits our website, [www.oaksmore-isa.co.uk](http://www.oaksmore-isa.co.uk) (“Our Site”) and will only collect and use personal data in ways that are described here, and in a way that is consistent with Our obligations and your rights under the law.

Please read this Privacy Policy carefully and ensure that you understand it. Your acceptance of this Privacy Policy is deemed to occur upon your first use of Our Site. If you do not accept and agree with this Privacy Policy, you must stop using Our Site immediately.

### 1. Definitions and Interpretation

In this Policy the following terms shall have the following meanings:

“Account”	means an account required to access and/or use certain areas and features of Our Site;
“Cookie”	means a small text file placed on your computer or device by Our Site when you visit certain parts of Our Site and/or when you use certain features of Our Site. Details of the Cookies used by Our Site are set out in Part 14, below; and
“Cookie Law”	means the relevant parts of the Privacy and Electronic Communications (EC Directive) Regulations (PECR);

### 2. Information About Us

Our Site is owned and operated by Oaksmore Portfolios AIFM Limited, a limited company registered in England under company number 10231997 and authorised and regulated by the Financial Conduct Authority, FRN: 752595.

Registered address: 1 Northumberland Avenue, London, England, WC2N 5BW.

### 3. What Does This Policy Cover?

This Privacy Policy applies only to your use of Our Site. Our Site may contain links to other websites. Please note that We have no control over how your data is collected, stored, or used by other websites and We advise you to check the privacy policies of any such websites before providing any data to them.

### 4. What is Personal Data?

Personal data is defined by the General Data Protection Regulation (EU Regulation 2016/679) (the “GDPR”) as ‘any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier’.

Personal data is, in simpler terms, any information about you that enables you to be identified.

Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

## 5. **What Are My Rights?**

Under the GDPR, you have the following rights, which We will always work to uphold:

- a) The right to be informed about Our collection and use of your personal data. This Privacy Policy should tell you everything you need to know, but you can always contact us to find out more or to ask any questions using the details in Part 15.
- b) The right to access the personal data We hold about you. Part 13 will tell you how to do this.
- c) The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete. Please contact us using the details in Part 15 to find out more.
- d) The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that We have. Please contact us using the details in Part 15 to find out more.
- e) The right to restrict (i.e. prevent) the processing of your personal data.
- f) The right to object to us using your personal data for a particular purpose or purposes.
- g) The right to data portability. This means that, if you have provided personal data to us directly, We are using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask us for a copy of that personal data to re-use with another service or business in many cases.
- h) Rights relating to automated decision-making and profiling. We do not use your personal data in this way.

For more information about Our use of your personal data or exercising your rights as outlined above, please contact us using the details provided in Part 15.

Further information about your rights can also be obtained from the Information Commissioner's Office.

If you have any cause for complaint about Our use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office.

## 6. **What Data Do We Collect?**

Depending upon your use of Our Site, We may collect some or all of the following personal and non-personal data (please also see Part 14 on Our use of Cookies and similar technologies):

- Name;
- Date of birth;
- Gender;
- Address;
- Email address;
- Telephone number;

- NI number
- Bank account number and sort code;
- Information about your preferences and interests;
- IP address;
- Web browser type and version;
- Operating system;
- A list of URLs starting with a referring site, your activity on Our Site, and the site you exit to;

## 7. **How Do You Use My Personal Data?**

Under the GDPR, We must always have a lawful basis for using personal data. This may be because the data is necessary for Our performance of a contract with you, because you have consented to Our use of your personal data, because it is in Our legitimate business interests to use it, or because we must comply with Our legal obligations. Your personal data may be used for one or more of the following purposes:

- Providing and managing your Account;
- Providing and managing your access to Our Site;
- Verifying your identity to comply with anti-money laundering rules;
- Personalising and tailoring your experience on Our Site;
- Supplying our products and services to you. Your personal details are required in order for us to enter into a contract with you;
- Personalising and tailoring Our products and services for you;
- Communicating with you. This may include responding to emails or calls from you;
- Supplying you with information by email and post that you have opted-in to (you may unsubscribe or opt-out at any time by updating your Account in the communication preferences in your investor portal);
- Analysing your use of Our Site and gathering feedback to enable us to continually improve Our Site and your user experience.

With your permission and/or where permitted by law, We may also use your personal data for marketing purposes, which may include contacting you by email or post with information, news, and offers on Our products and services. You will not be sent any unlawful marketing or spam. We will always work to fully protect your rights and comply with Our obligations under the GDPR and the Privacy and Electronic Communications (EC Directive) Regulations 2003, and you will always have the opportunity to opt-out.

Third Parties whose content appears on Our Site may use third-party Cookies, as detailed below in Part 14. Please refer to Part 14 for more information on controlling cookies. Please note that We do not control the activities of such third parties, nor the data that they collect and use themselves, and We advise you to check the privacy policies of any such third parties.

## 8. **How Long Will You Keep My Personal Data?**

We will not keep your personal data for any longer than is necessary in light of the reason(s)

for which it was first collected. We shall retain your data for as long as you are our customer and for a period after which we decide is reasonable in order to comply with any regulatory or legal requirements.

However, we review the personal data held on a regular basis in accordance with internal policy and if we conclude that certain personal data is no longer needed, that personal data will generally be destroyed.

#### **9. How and Where Do You Store or Transfer My Personal Data?**

Personal data is held securely on paper and computer systems. We must process this information fairly and lawfully. 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 that you do not share a password with anyone.

We only store or transfer your personal data within the European Economic Area (the “EEA”). The EEA consists of all EU member states, plus Norway, Iceland, and Liechtenstein. This means that your personal data will be fully protected under the GDPR or to equivalent standards by law.

However, we may decide to store or transfer some or all of your personal data in countries that are not part of the EEA. These are known as “third countries” and may not have data protection laws that are as strong as those in the UK and/or the EEA. In this event, We will take additional steps in order to ensure that your personal data is treated just as safely and securely as it would be within the UK and under the GDPR. If we decide we need to store or transfer some or all of your personal data outside of the EEA, this Policy will be updated to inform you of this change.

#### **10. Do You Share My Personal Data?**

We may share your personal data with:

- Oaksmore entities and associated companies involved in the management and administration of your investment account
- Judicial or governmental bodies (such as HMRC, Financial Conduct Authority, Financial Ombudsman Service) in order to comply with our legal and regulatory obligations – we can be fined and subject to other action if we fail to provide certain information to these authorities
- Someone acting on your behalf, such as an independent financial adviser or Trustee
- Service and software providers to assist with IT and security
- Our professional advisers, including legal advisers
- Credit reference and fraud prevention agencies to help us detect and prevent money laundering and financial crime

If any of your personal data is required by a third party, as described above, We will take steps to ensure that your personal data is handled safely, securely, and in accordance with your rights, Our obligations, and the third party’s obligations under the law, as described above in Part 9.

If any personal data is transferred outside of the EEA, We will take suitable steps in order to

ensure that your personal data is treated just as safely and securely as it would be within the UK and under the GDPR, as explained above in Part 9.

In some limited circumstances, We may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

## 11. **How Can I Control My Personal Data?**

**11.1** In addition to your rights under the GDPR, set out in Part 5, when you submit personal data via Our Site, you may be given options to restrict Our use of your personal data. In particular, We aim to give you strong controls on Our use of your data for direct marketing purposes (including the ability to opt-out of receiving emails from us which you may do by unsubscribing using the links provided in Our emails and/or at the point of providing your details and by managing your Account).

**11.2** You may also wish to sign up to one or more of the preference services operating in the UK: The Telephone Preference Service (“the TPS”), the Corporate Telephone Preference Service (“the CTPS”), and the Mailing Preference Service (“the MPS”). These may help to prevent you receiving unsolicited marketing. Please note, however, that these services will not prevent you from receiving marketing communications that you have consented to receiving.

## 12. **Can I Withhold Information?**

You may access certain areas of Our Site without providing any personal data at all. However, to use all features and functions available on Our Site you may be required to submit or allow for the collection of certain data.

You may restrict Our use of Cookies. For more information, see Part 14.

## 13. **How Can I Access My Personal Data?**

If you want to know what personal data We have about you, you can ask us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a “subject access request”.

All subject access requests should be made in writing to the postal address shown in Part 15. To make this as easy as possible for you, a Subject Access Request Form is available for you to use. You do not have to use this form, but it is the easiest way to tell us everything We need to know to respond to your request as quickly as possible.

There is not normally any charge for a subject access request. If your request is ‘manifestly unfounded or excessive’ (for example, if you make repetitive requests) a fee may be charged to cover Our administrative costs in responding.

We will respond to your subject access request within one month of receiving it. Normally, We aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date We receive your request. You will be kept fully informed of Our progress.

14. **How Do You Use Cookies?**

Our Site may place and access certain first-party Cookies on your computer or device. First-party Cookies are those placed directly by us and are used only by us. We use Cookies to facilitate and improve your experience of Our Site and to provide and improve Our products and services. We have carefully chosen these Cookies and have taken steps to ensure that your privacy and personal data is protected and respected at all times.

By using Our Site, you may also receive certain third-party Cookies on your computer or device. Third-party Cookies are those placed by websites, services, and/or parties other than us. These Cookies are not integral to the functioning of Our Site and your use and experience of Our Site will not be impaired by refusing consent to them.

All Cookies used by and on Our Site are used in accordance with current Cookie Law.

Before Cookies are placed on your computer or device, you will be shown a pop up requesting your consent to set those Cookies. By giving your consent to the placing of Cookies you are enabling us to provide the best possible experience and service to you. You may, if you wish, deny consent to the placing of Cookies; however certain features of Our Site may not function fully or as intended. You will be given the opportunity to allow only first-party Cookies and block third-party Cookies.

Certain features of Our Site depend on Cookies to function. Cookie Law deems these Cookies to be “strictly necessary”. An example includes a “Session cookie” which is integral to the code that runs the content management system. Your consent will not be sought to place these Cookies, but it is still important that you are aware of them. You may still block these Cookies by changing your internet browser’s settings as detailed below, but please be aware that Our Site may not work properly if you do so. We have taken great care to ensure that your privacy is not at risk by allowing them.

Our Site uses analytics services, for example Google Analytics. Website analytics refers to a set of tools used to collect and analyse anonymous usage information, enabling us to better understand how Our Site is used. This, in turn, enables us to improve Our Site and the products AND services offered through it.

The analytics service(s) used by Our Site use(s) Cookies to gather the required information. You do not have to allow us to use these Cookies, however whilst Our use of them does not pose any risk to your privacy or your safe use of Our Site, it does enable us to continually improve Our Site, making it a better and more useful experience for you.

In addition to the controls that We provide, you can choose to enable or disable Cookies in your internet browser. Most internet browsers also enable you to choose whether you wish to disable all Cookies or only third-party Cookies. By default, most internet browsers accept Cookies, but this can be changed. For further details, please consult the help menu in your internet browser or the documentation that came with your device.

You can choose to delete Cookies on your computer or device at any time, however you may lose any information that enables you to access Our Site more quickly and efficiently including, but not limited to, login and personalisation settings.

It is recommended that you keep your internet browser and operating system up-to-date and that you consult the help and guidance provided by the developer of your internet browser and manufacturer of your computer or device if you are unsure about adjusting your privacy settings.

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

15. **How Do I Contact You?**

To contact us about anything to do with your personal data and data protection, including to make a subject access request, please use the following details:

Data Protection Team  
Oaksmore Portfolios AIFM Limited  
1 Northumberland Avenue  
London, England  
WC2N 5BW

16. **Changes to this Privacy Policy**

This notice is the latest version as at September 2018 and We may change this Privacy Policy from time to time. This may be necessary, for example, if the law changes, or if We change Our business in a way that affects personal data protection.

Any changes will be immediately posted on Our Site and you will be deemed to have accepted the terms of the Privacy Policy on your first use of Our Site following the alterations. We recommend that you check this page regularly to keep up-to-date.