

## Data Processing Policy

### Overview

This Data Processing Policy is applicable to North Capital Management Ltd's (NCM) core discretionary investment management function. This policy should be read in conjunction with the Firm's standard terms of business. The Chief Operating Officer is responsible for this policy.

### Introduction

Changes to UK data privacy law came into effect on the 25<sup>th</sup> of May 2018. The new regulation passed by the European Parliament is the General Data Protection Regulation (GDPR). This Privacy Notice explains how we use your personal data, describes the categories of personal data we process and for what purposes. We are committed to collecting and using such data fairly and in accordance with the regulatory requirements.

At NCM, we take your privacy and the protection of your personal data very seriously. We have reviewed our internal systems, processes and third parties that hold your data and are satisfied that it is secure and GDPR compliant. You can find out more here about your privacy rights and how we gather, use and share your personal information.

### Summary

#### Who we are

NCM, of 58 North Castle Street, Edinburgh EH2 3LU acts as a data controller for personal information relating to yourself.

#### Your rights

You have the right to object to how we process your personal information. You also have the right to access, correct, restrict and sometimes delete the personal information we use. In addition, you have a right to complain to us and to the data protection regulator. Contact details are shown here.

- George Renouf – [george.renouf@northcapital.co.uk](mailto:george.renouf@northcapital.co.uk) or write to us at the address shown above.
- UK Information Commissioner: [ico.org.uk/global/contact-us](http://ico.org.uk/global/contact-us)

Your privacy rights are detailed on the following pages and this policy document acts as a guide to that.

We will not share your information with any other party, except as indicated in this Privacy Policy Statement, or where required to do so by any statutory, governmental or regulatory body for legitimate purposes.

### **Sharing and transferring personal information**

Where necessary to the provision of our service, we may share your personal information with third parties. The categories of third party are listed later in this notice. Sometimes we transfer personal information to countries outside the European Economic Area for these purposes, but only where suitable protection is in place.

### **Keeping personal information**

We keep your personal information securely for as long as we need to for the purpose of providing you with the expected level of service or, for as long as we are required to by relevant regulations.

### **Legal basis for collecting/processing information**

We have a legitimate interest in processing and holding your personal data. This legitimate interest allows us to gather and hold your personal information to enable us to deliver our expected level of service to you or, an individual connect with yourself. However, some types of sensitive information require your explicit consent. In particular, in relation to any adverse health history you might have. We will seek your consent if required. Where you have given us consent, you have the right to withdraw it at any time.

### **Our Policy on your Privacy Rights**

You have the right to see what personal information we hold about you and you can ask us to correct inaccuracies, delete or restrict personal information or ask for some of your personal information to be provided to someone else. You have the right to object to how we use your personal information. If you need to contact us in relation to any of your rights or wish to make a complaint about how we have used your personal information, please direct queries to us or to the Information Commissioner's Office. You can use the contact details indicated on the first page of this notice.

- **Right to withdraw consent:** Where you have given us your consent to use personal information, you can withdraw your consent at any time.
- **Access to your personal information:** You can request access to a copy of your personal information. We will not normally charge for providing this information to you.
- **Portability:** You can ask us to provide you or a third party with some of the personal information that we hold about you in a commonly used electronic form.
- **Rectification:** You can ask us to change or complete any inaccurate or incomplete personal information held about you.
- **Erasure:** You can ask us to delete your personal information where it is no longer necessary for us to use it, you have withdrawn consent, or where we have no lawful basis for keeping it. Note that we might be required by regulations to retain your information even if you want it to be deleted.
- **Right to object:** You can object to our processing of your personal information.
- **Restriction:** You can ask us to restrict the personal information we use about you where you have asked for it to be erased or where you have objected to our use of it.

### **What kinds of personal information we use**

We use information relating to your personal situation and financial position.

### **How we gather your personal information**

We obtain personal information:

- directly from you, usually in a face to face meeting but potentially also by recorded telephone call or other means;
- from other organisations such as investment/pension/tax/insurance providers, where you have provided authority for them to share information relating to your existing plans;
- from your professional advisers, where you have provided authority for them to share information.

### **How we use your personal information**

We hold your personal information as Data Controllers in accordance with the requirements of the Data Protection Act 2018 and the EU General Data Protection Regulation, together referred to as the 'Regulations'.

We use this information to analyse your current and future financial needs so that we can ensure that any subsequent advice takes due account of, and is suitable to, your circumstances.

We will not share your information with any other party, except as indicated in this Privacy Statement or where required to do so by any statutory, governmental or regulatory body for legitimate purposes.

### **Sharing and transferring personal information**

Where necessary to the provision of our service, we may share your personal information with third parties. The categories of third party are listed below.

- Insurance Providers
- Pension Providers
- Investment Providers
- Investment Platforms
- Compliance Advisers
- Legal Advisers
- Professional Advisers
- Back Office Systems Providers
- Third Party Software Providers

We will only share your data in accordance with GDPR and where necessary to implement the service that you require. Sometimes we transfer personal information to countries outside the European Economic Area for these purposes, but only where suitable protection is in place.

**This data protection policy is reviewed regularly by the NCM Board and is available on request to clients**