

Privacy Policy

This notice describes how Addington Capital uses personal data. It outlines Addington Capital's data protection obligations and your data protection rights under the regime introduced by the EU General Data Protection (Regulation 2016/679, the "General Data Protection Regulation").

The GDPR applies to "personal data" meaning any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier.

Addington Capital needs to use your personal data to provide its services to you, so this notice outlines the following points about the processing of your personal data:

- which data items are used, how they are used and with whom they are shared;
- why this is done and the lawful basis;
- your rights and Addington Capital's obligations.

Why Addington Capital needs to process personal data

Your data is collected to effectively and properly manage your account(s) with us. Data is stored for specific purposes and only data that is relevant to that purpose will be stored. We will use the Data for several different purposes, including;

to provide consultancy services and to carry out obligations arising from any agreements entered into between you and Addington Capital

to provide you with information, products or services that you request from us (including through our website) or which we feel may interest you, where you have consented to be contacted for such purposes;

to make our procedures more efficient, to implement security measures and to combat fraud and other crimes;

to competent authorities (including tax authorities), courts and bodies as required by law or requested or to affiliates for internal investigations and reporting and to notify you about changes to our products and services and your investments.

If at any time you wish to be removed from marketing mailing lists or for any limits to be applied with respect to marketing materials received by you, please let us know. You can do this by e-mailing us at info@addington.uk.com.

Data Collection

Addington Capital may collect data:

- when you or an agent of yours contacts Addington Capital in relation to business and services offered;
- when you complete documents or forms during the course of business with Addington Capital
- from Service Providers and other third parties that assist us in conducting business;
- when you telephone Addington Capital and
- when you use the Addington Capital website or online services.

Data Storage

Addington Capital stores your data on physical and electronic media. Data is safeguarded by Addington Capital and its Service Providers by maintaining physical and electronic security controls that are designed to comply with applicable legal standards.

The Data that is collected or held in relation to you may be transferred to, and stored at, a destination outside the European Economic Area (“EEA”). It may also be processed by staff operating outside the EEA who works for us or for one of our Service Providers. In some cases, the laws of the destination country may not provide the same level of data protection as countries within the EEA. However, all Data wherever they are held by Addington Capital will be afforded a high level of protection against any unauthorised or accidental disclosure, access or deletion. By submitting your Data you agree to this transfer, storing or processing.

Unfortunately, the transmission of information via the internet is not completely secure. Although Addington Capital will do its best to protect your Data, we cannot guarantee the security of your Data transmitted electronically. Any such transmission is at your own risk.

Types of data that might be collected

During Addington Capital’s relationship with you, Addington Capital will collect and process Data about you, including:

- information which individuals and entities provide when contacting us (including through using this website) (such as their names, postal addresses, telephone numbers, identification documents and e-mail addresses);
- corporate information;
- details of services provided to you;

Data sharing

Addington Capital uses Service Providers to conduct aspects of its business, so information may be disclosed to them and their affiliates Data that you have provided in order to fulfil the purposes for which the Data is held. These Service Providers may disclose such Data to each other and to each other’s affiliates in order to achieve the same purposes.

Addington Capital and its Service Providers may also be required to disclose your Data to governmental agencies, self-regulatory organisations, industry associations and similar bodies in order to fulfil legal and regulatory requirements. In addition, the laws of certain countries and states give people involved in lawsuits and other legal proceedings the right under certain circumstances to obtain information from Addington Capital and its Service Providers, including your Data. Addington Capital and its Service Providers will comply with these laws to the extent required.

Addington Capital will not sell your Data to any third party. Wherever possible, Service Providers are required to enter into confidentiality agreements that prohibit them from selling or improperly using your Data.

Data retention

Addington Capital will retain your personal information for a period of up to seven years following the point where the business relationship has ceased.

It may be necessary to retain your personal information beyond this period depending on additional legal/regulatory obligations. Thereafter, Addington Capital will refrain from collecting any further personal information on you and shall take appropriate steps to dispose of any records containing your personal information to the extent this is operationally feasible and proportionate.

Cookies

Addington Capital does use cookies on its website.

Your personal data is not currently collected by Addington Capital using cookies. Further details are available in our cookie policy.

Lawful basis for processing

Addington Capital assesses all personal data that is collected or stored to ensure that there is a legal basis for each type of data under GDPR. Given that Addington Capital is an appointed representative of a FCA regulated firm (Thornbridge Investment Management), the majority of lawful basis for Addington Capital processing is to meet its obligations to the FCA (legal obligation basis) or to fulfil its obligations to you under contract (contract basis).

Other lawful basis may be used where Addington Capital assesses this is necessary and appropriate.

Data subject rights

You have the following rights, in certain circumstances, in relation to your personal information:

- Right to access your personal information (in an easily readable form);
- Right to rectify your personal information;
- Right to restrict the use of your personal information (in certain specific circumstances);
- Right to request that your personal information is erased (in certain specific circumstances).
- Please note that the right for your data to be erased (the "right to be forgotten") that applies in some contexts under the General Data Protection Regulation is not likely to be applicable to most, if not all, of the personal information you provide to Addington Capital given the specific nature of the purposes for which Addington Capital uses the data, as described above;
- Right to object to processing of your personal information (in certain specific circumstances);
- Right to data portability (in certain specific circumstances);
- Right to withdraw consent (in certain specific circumstances); and
- Right to receive information regarding any entities we disclose your data to.

Where Addington Capital or its Service Provider(s) requires your personal information to comply with AML or other legal requirements, failure to provide this information means Addington Capital will not be able to accept you as a client or investor.

Addington Capital shall notify you of any personal information breach affecting you that is likely to result in a high risk to your rights and freedoms.

Changes to this notice

Addington Capital will need to update its privacy notice in response to regulatory requirements or changes to its business. The latest notice will always be available on the Addington Capital website (<http://www.addington.uk.com/>).

How to contact Addington Capital

Under the GDPR, data subjects can make a complaint to the supervisory authority including the Member State in which they reside or work or the place of the alleged infringement.

If you have any questions or concerns about personal data or this privacy policy or you wish to make a complaint about how Addington Capital has processed your personal data, please contact Addington Capital by writing to info@addington.uk.com or by post at the following address:

Addington Capital LLP

6 Heddon Street

London

W1B 4BT

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