

## Privacy Notice for International Asset Management Limited

International Asset Management Limited (UK company registration number 2355655) (IAM) is committed to protecting the privacy of our clients. This notice sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by IAM.

The General Data Protection Regulation (GDPR) (Regulation (EU) 2016/679) is a new regulation which replaces the Data Protection Regulation (Directive 95/46/EC). The Regulation aims to harmonise data protection legislation across EU member states, enhancing privacy rights for individuals and providing a strict framework within which commercial organisations can legally operate.

Even though the UK has expressed its intention to leave the EU in March 2019, the GDPR will be applicable in the UK from 25th May 2018. The Government intends for the GDPR to continue in UK law post Brexit and has also introduced a Data Protection Bill to replace the current Data Protection Act in due course.

Your new rights under the GDPR are set out in this notice but will only apply once the GDPR becomes law on 25th May 2018.

Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

For the purposes of data protection legislation in force from time to time, the data controller is IAM of 11a Regent Street, London, W1S 4LR. Our Data Protection Officer is Alexander von Mühlen.

### Who we are and what we do

IAM is authorised and regulated by the Financial Conduct Authority (FCA) and are an Alternative Investment Fund Manager (AIFM) as defined by the Alternative Investment Fund Managers Directive (2011/61/EU). We provide discretionary and advisory investments management services to our clients. IAM is both a data controller and data processor.

We may collect the personal data of the following types of people to allow us to undertake our business;

- employees
- customers and clients
- suppliers
- complainants, enquirers
- professional advisers and consultants.

The personal data we collect includes but may not be limited to:

- personal details
- family details
- life-style and social circumstances
- employment details
- financial details
- goods or services
- business activities of the person whose personal information we are processing.

## **Purposes of the processing and the legal basis for the processing**

We process personal data to enable us to provide investment management services, conduct research, maintain our own accounts and records, promote our services and to manage and support our employees.

Our legal basis for the processing of personal data is our legitimate business interest, described in more detail below, although we will also rely on contract, legal obligation and consent for specific uses of data.

We will rely on contract if we are negotiating or have entered into an agreement with you or your organisation or any other contract to provide services to you or receive services from you or your organisation.

We will rely on legal obligation if we are legally required to hold information on you to fulfil our legal obligations.

Should we want or need to rely on consent to lawfully process your data we will request your consent orally, by email or by an online process for the specific activity we require consent for and record your response on our system. Where consent is the lawful basis for our processing you have the right to withdraw your consent to this particular processing at any time.

## **Our legitimate business interests**

Our legitimate interests in collecting and retaining your personal data is described below:

As a regulated investment management services firm we are required to hold personal data on our clients and employees. In delivering our services we regulatory conduct research on other firms and their owners/employees. We also conduct marketing and distribution in respect of our services and products.

## **Disclosure of your information inside and outside of the EEA**

We will share your personal information with:

Any member of our group of companies both in the EEA and outside of the EEA.

Selected third parties including but not limited to reference/back-ground checking agencies, payroll service providers, insurance brokers, compliance consultants, financial institutions, regulators, digital storage facilities and other service providers.

The lawful basis for the third party processing will include:

- their own legitimate business interests in processing your personal data
- satisfaction of their contractual obligations to us as our data processor
- for the purpose of a contract in place or in contemplation
- to fulfil their legal obligations.

## **Where we store and process your personal data**

The data that we collect from you may/will be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). It may be transferred to third parties outside of the EEA for the purpose of our investment services, currently this is for data administration purposes primarily – for example we employ cloud solutions for certain electronic communications and certain files/records may be stored on servers at group companies. It may/will also be processed by staff operating outside the EEA who work for us or for one of our suppliers. By submitting your personal data, you agree to this transfer, storing or

processing. IAM will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy notice.

All information you provide to us is stored on our secure servers or secured facilities. We will use strict procedures and security features to try to prevent unauthorised access.

### **How long will we keep your personal information?**

We will only retain the information we gather from you for a period of seven years from the date of termination of our relationship with you, or for such other period as may be required from time to time under relevant laws and regulations, including those relating to record keeping and prescription periods. Such information may be retained after your account with us has been closed, and for customer identification purposes in accordance with our record keeping policy.

### **Your rights**

If you believe that any of the centrally held information, including your personal information, is incorrect or inaccurate, you should notify us so that the information can be updated or corrected, as appropriate.

You have the right to:

- access your personal information
- request correction, restriction, portability or erasure of the information that we process about you.

These rights are subject to any applicable exemptions under the data protection laws.

You may seek to exercise these rights at any time by sending a request by email to [amuhlen@iam.uk.com](mailto:amuhlen@iam.uk.com) or writing to Data Protection Officer, 11a Regent Street, London, SW1Y 4LR and providing further information (including appropriate proof of identity) as requested by us.

You can withdraw your consent to the processing of your personal information (where we are processing your personal information based on your consent). If you object to the processing of your personal information, or if you have provided your consent to processing and you later choose to withdraw it, we will respect that choice in accordance with our legal obligations. However, this may limit or prevent us from providing the products or services you have asked for. It may also make it more difficult for us to advise you or suggest appropriate alternatives.

If you feel that we do not comply with applicable privacy rules you have the right to lodge a complaint with a competent data protection authority.