

# RJD PARTNERS LIMITED

## PRIVACY NOTICE

### 1 About this notice

This notice (the “**Privacy Notice**”) provides information about how RJD Partners Limited (“**we**”, “**us**”, “**our**”) gathers and uses personal information. We are committed to respecting the confidentiality of the personal information you supply to us and all data will be processed in accordance with applicable data privacy laws.

You have the right to be provided with clear, transparent and easily understandable information about how we use your information and your rights. This is why we are providing you with the information in this Privacy Notice.

If you do not agree with our use of your personal data as set out in this Privacy Notice, you should not submit your personal information to us. However, if you do not wish to submit your personal information, or if you wish to exercise your rights to prevent us using your data, you should be aware that we may not be able to do business with you. For more information on this, please see sections 4.1 and 7.

### 2 About us

We are RJD Partners Limited (company number 04245768), registered at 6-7 Queen Street, London, EC4N 1SP. For the purposes of data privacy legislation, we will be a ‘controller’.

### 3 Contacting us

Should you have any questions or concerns about this Privacy Notice or the processing of personal data we hold about you, please contact us:

By post:	6-7 Queen Street, EC4N 1SP
By phone:	+44 (0) 207050 6868
By email:	Leo.scanavino@rjdpartners.com

### 4 Your rights

You have certain rights in relation to your personal data.

#### 4.1 Your rights in connection with personal information

Under certain circumstances, by law you have the right to:

- **Object to processing of your personal information where we are relying on a legitimate interest (or that of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.**
- Request access to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are processing it lawfully.
- Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.

- Request erasure of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see above).
- Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- Request the transfer of your personal information to another party in a machine-readable, commonly used and structured format.

If you want to exercise any of these rights then please contact us using the details at section 3. The various rights are not absolute and each is subject to certain exceptions or qualifications. For example, if you wish to withdraw your consent or object to processing, we may need to discuss with you whether our use of your data needs to continue for other lawful purposes, such as fulfilment of a legal or contractual requirement.

We will respond to your request within one month of receipt of your request. In some cases we may not be able to fulfil your request to exercise the right before this date, and may need to request more time. Where we cannot provide a full response to you for any reason, we will let you know about this in our initial reply to your request.

#### 4.2 **Your duty to inform us of changes**

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your working relationship with us.

#### 4.3 **Fees**

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). In some cases, we may charge a reasonable fee if your request for access is clearly unfounded or excessive, or if you request multiple copies of the information. Alternatively, we may refuse to comply with the request in such circumstances.

#### 4.4 **What we may need from you**

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

#### 4.5 **Right to complain**

If you wish to request further information about any of the above rights, or if you are unhappy with how we have handled your information, please contact us on the contact details contained in section 3.

If you are not satisfied with our response to your complaint or believe our processing of your information does not comply with data protection law, you can make a complaint to your supervisory authority. For example, if you live in the UK, you can contact the Information Commissioner's Office: <https://ico.org.uk/global/contact-us/> or 0303 123 1113.

### 5 **Information we collect**

We collect your personal information from a variety of sources, as set out in this Privacy Notice. Where necessary we collect information directly from you or indirectly from third parties, and through your use of our website.

## 5.1 Information you provide to us

This section details the information we collect about you in the course of your relationship with us and otherwise in your interaction and correspondence with us and our representatives. We will collect:

- basic personal details including your name and address (and proof of name and address), email address, telephone number, any other contact details you supply;
- banking details; and
- records of all communications including recordings of phone calls and electronic communications with our staff and meeting notes (see below for more details).

## 5.2 Information we collect from other sources

We will receive information about you from third parties. We will collect the following information from third parties:

- basic personal details including your name, address, email address, telephone number and other contact details; and
- data received from due diligence activities (such as anti-money laundering, politically exposed persons and sanctions checks).

## 6 How we use the information we collect

### 6.1 General uses of information

The information which we collect and what we use it for will depend on the nature of our business relationship with you. We use your information:

- to provide you with services which you have requested and to fulfil our contractual obligations towards you;
- to fulfil our contractual obligations to third parties to whom you have provided your information;
- for our internal business administration and record keeping purposes;
- for legal and regulatory compliance purposes, including as necessary to respond to governmental, regulatory or law enforcement agency requests; and
- where required or considered appropriate, carrying out 'know-your-client' (KYC) checks and other procedures that we undertake prior to you becoming a client of ours and in the course of our ongoing business relationship.

### 6.2 Information for marketing purposes

We use your information to identify products, services and events that we think may be of interest to you.

We will only send you marketing messages where you have consented to such contact, or in the case of products and services, where these are similar to those that we have already provided to you.

**You have the right to ask us not to send you marketing messages by post, telephone or e-mail or any combination of these at any time.** You can also let us know at any time that you wish to change your mind and to start receiving such messages.

You can do this:

- by replying directly to the marketing message;
- at any time by contacting us (see section 3).

If you choose to unsubscribe, we will cease to send you such communications as mentioned above.

## 7 **Our bases for collecting and using the information**

We are entitled to use your personal data in the ways set out in this Privacy Notice on the following bases:

- the use of personal data in this way is necessary for the performance of a contract with you for provision of our products and/or services or to take steps at your request prior to entering into such a contract;
- we have legal obligations that we have to discharge;
- the use of your personal data is necessary for our legitimate interests in:
  - ensuring the quality of the products and services we provide to you;
  - collecting information for marketing purposes;
  - communicating with you; and
  - statistical analysis;
- you have consented to such use; and/or
- to establish, exercise or defend our legal rights for the purposes of legal proceedings.

If provision of your personal information is a legal or contractual requirement or a requirement necessary to enter into a contract with us, and you choose not to provide it, we may not be able to perform some of the tasks we need to in order to provide certain products or services to you.

If you do choose to provide your consent you can withdraw it at any time by contacting us (see section 3).

## 8 **Sharing your information**

We will not disclose your personal information to third parties except as detailed in this Privacy Notice.

Where necessary, we disclose your personal data to third parties that are specifically engaged by us to provide services to us, in which case we will require those parties to keep that information confidential and secure and to use it solely for the purpose of providing the specified services to us. We may provide your information to third parties engaged by us to provide services to us:

- professional advisers, including accountants, auditors, compliance consultants, legal advisers and tax advisers;
- fraud prevention agencies;
- information technology providers, including providers of client relationship management systems, and information security providers;

- fund administrators
  - insurance brokers; and
  - data storage suppliers.
- we may disclose to law enforcement agencies and regulators, government departments or competent authorities of the UK or of other countries any personal data (including tax status, identity or residency or other personal and payment information, documents or self-certifications) where we are under a duty to disclose or share your information in order to comply with any legal or regulatory obligation, or if we reasonably consider that this is necessary to help prevent or detect fraud or other crime or to protect our rights, property, or safety, or that of our customers or others. Such disclosure may be made directly to such regulators or competent authorities or made indirectly to our advisers or providers who will make such filings or disclosures on our behalf;
  - if we are under a duty to disclose or share your information with HM Revenue & Customs (HMRC) or other tax authorities, who may transfer it to the government or the tax authorities in another country where you may be subject to tax. Such disclosure may be made directly to such regulators or competent authorities or made indirectly to our advisers or providers who will make such filings or disclosures on our behalf; and
  - if you have consented to any disclosure to a third party.

## 9 **Where we store your information**

We do not transfer, use and/or store your personal information outside of the European Economic Area (“**EEA**”)

Transfers to our third party service providers are to enable them to use and store your personal information on our behalf. We will, however, put in place appropriate security procedures in order to protect your personal information. Where your information is transferred to any country outside the EEA, we ensure that this is done using specific legally-approved safeguards. You can request further details and a copy of these safeguards by contacting us (see section 3).

## 10 **Keeping your information**

We will keep your information only for as long as necessary depending on the purpose for which it was provided. Any information will be held for a period of five years after the termination of the relationship between you and us.

## 11 **Security**

We acknowledge that the information you provide may be confidential and will maintain the confidentiality of and protect your information in accordance with our normal procedures and all applicable laws. We employ appropriate technical and organisational security measures to help protect your personal data against loss and to guard against access by unauthorised persons. We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

In addition, those employees, agents, contractors and other third parties who process your personal data will only do so on our instructions and they will be subject to a duty of confidentiality.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data. Any transmission is at your own risk. Once we have received your information, we will use procedures and security features to try to prevent unauthorised access.

12 **Links to other websites**

Links on our website may take you to third party sites over which we have no control. While such links are provided for your convenience, you should be aware that the information handling practices of the linked websites might not be the same as ours. You should review any privacy notices on those linked websites. We are not responsible for any linked websites.

13 **Changes to our Privacy Notice**

We reserve the right, at our discretion, to change, modify, add to, or remove portions from, our Privacy Notice. We will of course notify you of any changes where we are required to do so.