

## PRIVACY NOTICE

### 1. GENERAL

Marsham Investment Management LLP (“we” or “our”) is committed to protecting and respecting your privacy. This policy sets out the basis on which personal information you provide will be processed or used by the Firm.

### 2. DATA CONTROLLER

We are the data controller responsible for your personal data and are registered with the Information Commissioner’s Office (“ICO”) with reference number ZA176582.

### 3. APPOINTED PERSONS

We have opted not to appoint a Data Protection Officer, which is within the GDPR. If there are any matters relating to Data Protection, you can contact us via the website.

### 4. INFORMATION WE COLLECT ABOUT YOU

We collect and process personal information about you for the following reasons:

- a. Provision of services;
- b. Enter into a contract for the performance of our services; and
- c. Comply with our legal obligations, for example, we need to verify your identity for the purposes of fraud prevention under the Money Laundering Regulations 2017.

We will collect your personal information from you directly. These documents can be provided to us by email.

### 5. HOW YOUR INFORMATION WILL BE USED

- a. Establish your financial circumstances, investment objectives, knowledge and experience, and risk tolerance in relation to those objectives;
- b. Provide you with information on any relevant regulatory matters or changes to our policies or process that may impact you;
- c. Verify your identity to protect against fraud, comply with anti-financial crime laws and to confirm your eligibility to use our services; and
- d. Improve our services

### 6. MARKETING

We do not use your data for marketing purposes and will not be sending you any marketing communications. Should this change, we will notify you in advance and provide you with an updated copy of our Privacy terms.

### 7. DISCLOSURE OF YOUR INFORMATION

We will only disclose your personal information to third parties if we are legally obliged to do so or where we need to comply with our contractual duties, for instance we may need to provide certain information to counter parties as part of the course of our services.

### 8. DATA STORAGE AND INTERNATIONAL TRANSFERS

We use cloud-based storage providers to safely and securely store your data, which means that your information may be processed outside of the EEA in order We will take all steps to ensure that your data is treated securely and in accordance with this privacy policy.

## 9. RETAINING YOUR PERSONAL INFORMATION

As an FCA authorised Firm, we are obliged to retain your information for a certain period. As such. We will retain your information for a period of five years after the termination of our business relationship.

## 10. YOUR LEGAL RIGHTS

### 10.1. Under the GDPR and Data Protection Act 1998, you have the rights to:

**a. Request access to your personal data (commonly known as a "data subject access request"):**

**b. Request correction of the personal data that we hold about you:**

You can request that we correct any incomplete or inaccurate data we hold about you. We may however, need to verify the accuracy of the new data you provide to us.

**c. Request erasure of your personal data:**

- You can ask us to delete or remove personal information where there is no good reason for us continuing to process it.
- You can ask us to delete or remove your personal information where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law.

Note:

We may not always be able to comply with this request. As an FCA authorised firm, we are under certain obligations to retain certain data for a minimum period. Please note that these requirements supersede any right to erasure requests under applicable data protection laws.

**d. Object to processing of your personal data:**

This is in situations where we are relying on a legitimate interest and there is something about your situation which makes you object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. As an FCA authorised firm, we are under obligations to process and retain certain data for compliance purposes. Please note that these requirements will supersede any right to objection requests under applicable data protection laws. If you still object to the processing of certain data, we may not be able to provide you with our services.

**e. Request restriction of processing of your personal data:**

You can request that we suspend the processing of your personal data in the following scenarios:

- a. if you want us to establish the data's accuracy;
- b. where our use of the data is unlawful, but you do not want us to erase it;
- c. where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or
- d. you have objected to our use of your data, but we need to verify whether we have overriding legitimate grounds to use it. Please note that any requests in relation to the restriction of the processing of your data means that we may not be able to perform the contract we have or are trying to enter with you. In this case, we may have to cancel your use of our services, but we will notify you if this is the case at the time.

**f. Request the transfer of your personal data to you or to a third party:**

We will provide you or an authorised third party with your personal information in a structured, commonly used, machine-readable format, which you can then transfer to an applicable third party.

**g. Withdraw consent at any time where we are relying on consent to process your personal data**

### **10.2. No fee usually required**

You will not have to pay a fee to access your personal information. However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

### **10.3. Time limit to Respond**

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made several requests. In this case, we will notify you and keep you updated.

## **11. IF YOU FAIL TO PROVIDE PERSONAL DATA**

You are not obliged to provide your personal information to us. However, as we require this information to comply with our legal obligations and provide our services, we will be unable to provide you with our services.

## **12. COMPLAINTS**

You have the right to make a complaint at any time to the ICO at

**Email:** [www.ico.org.uk](http://www.ico.org.uk).

**Post Address:** Information Commissioners Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

## **13. CHANGES TO PRIVACY POLICY**

Any changes we may make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail.