

# Privacy Notice

## Privacy Notice

This policy sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

Satis Asset Management Limited (Satis) is a Private Limited Company registered in England and Wales (07998681) and regulated by the Financial Conduct Authority (761140). Our registered office is 45 Pall Mall, London, SW1Y 5JG. Associated companies covered by this notice include Hillier Hopkins LLP, Hillier Hopkins Group Limited, Sublime Accounting Limited, HH Accounting & Tax Services Limited and Pall Mall Business Services Limited.

We confirm when processing data on your behalf that we will comply with the relevant provisions of the Data Protection Legislation. You will also ensure that any disclosure of personal data to us complies with the Data Protection Legislation.

## Information we collect and why we collect it

Satis will collect personal data about you when you engage us for financial and tax planning, investment management and accounting services. This information will relate to your personal and financial circumstances. It may also include special categories of personal data about your health, where this is necessary for the provision of our services. Where special category data is required we will obtain your explicit consent in order to collect and process this data.

The primary legal basis Satis intend to use for the processing of your data is necessity for fulfilment of contract. The information that we collect about you is essential for us to be able to carry out the services that you require and for us to fulfil our legal and regulatory obligations.

Examples include:

Entering into a contract - At the beginning of our relationship we will need you to provide us with personal and financial information to allow us to decide the suitable service for you this could be before you engage us fully as a client.

Complete a contract – where you invest via a third party such as a platform it will be necessary for Satis to provide information to the provider to complete contractual obligations.

Satis may need to gather personal information about your close family members and dependants in order to provide our service to you effectively. In such cases it will be your responsibility to ensure that you have the consent of the people concerned to pass their information to us. Where required Satis will provide further copies of this privacy notice.

## Sharing of information

In order to deliver our services to you effectively we may send your details to third parties such as those that we engage for professional compliance, accountancy or legal services as well as product and platform providers that we use to arrange financial products for you. To fulfil our obligations in respect of prevention of money laundering and other financial crime we may send your details to third party agencies for identity verification purposes.

Where third parties are involved in processing your data we will have a contract in place with them to ensure that the nature and purpose of the processing is clear, that they are subject to a duty of confidence in processing your data and that they will only act in accordance with our written instructions.

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Where it is necessary for your personal data to be forwarded to a third party appropriate security measures to protect your personal data in transit will be used.

Sometimes a product or service may be administered from a country outside Europe. If this is the case, Satis have put a contract in place to ensure that your information is adequately protected.

## **Retention of data**

In principle, your personal data should not be held for longer than is required under the terms of our contract for services with you. However, we are subject to regulatory requirements to retain data for specified minimum periods. We also reserve the right to retain data for longer than this due to the possibility that it may be required to be provided to a regulator outside of these minimum periods. Once engaged as a client Satis will not retain your personal data for longer than 20 years after being notified of your death (or cessation for a legal entity). If you do not engage us to work on your behalf we will retain the data collected for 1 year after our last contact with you. If you cease to be a client with Satis Asset Management after engagement we will archive and restrict access to the information that we continue to hold on you.

## **Your rights**

Under Data Protection legislation, subject to our own legal obligation you have the right to:

- Be informed how Satis will process your data. This is the intention of this document, if after reading this you feel you require further information in regards to our arrangements please contact us.
- Request deletion of your personal data. We will comply with this request, subject to the restrictions of our regulatory obligations and our retention of data policy.
- Request a copy of the information that we hold about you. If you require a copy of some or all of your personal information held please email or write to us using the contact details noted below.
- Ask us to move your personal data to another organisation for their use where your personal data is processed by automated means.
- Object to your data being processed, this right does not apply where the data is necessary for the fulfilment of contract.
- Request restriction of your data. This will allow Satis to retain the data collected but no longer process it, this will automatically take place should you end your relationship with Satis.

We have an obligation to ensure that your personal information is accurate and up to date. Please ask us to correct or remove any information that you think is incorrect.

## **Telephone calls**

As part of our regulatory responsibilities we may record incoming and outgoing telephone calls, the data collected through these calls is treated in the same manner and held to the same standards as all other data collected.

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## **Requests and Complaints**

Requests in relation to your rights must be made in writing to the Data Protection Manager at Satis Asset Management Ltd, 45 Pall Mall, London, SW1Y 5JG or via email to

[DPManger@satisuk.com](mailto:DPManger@satisuk.com)

To lodge a complaint with the supervisory authority for data protection the contact details are Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF. Telephone 0303 123 1113 (local rate)

## **Privacy Notice Updates**

This Privacy Notice is regularly reviewed and was last updated on 27th April 2018.