

Privacy Notice

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General Data Protection Regulation (“GDPR”)

Our Privacy Notice explains how we use your personal data, describes the categories of personal data we process and for what purposes. We are committed to collecting and using such data fairly and in accordance with the requirements of the Data Protection Act 2018.

Why are we providing this notice?

The General Data Protection Regulation (“GDPR”) applies to the collection, processing and storage of personal data undertaken by organisations within the European Economic Area (EEA), as well as to firms outside the EEA that handle personal data relating to the offering of goods or services to individuals in the EEA.

The GDPR has two key purposes:

- (a) to set guidelines for the collection, processing and protection of personal data and
- (b) to give individuals certain rights in relation to their personal data (such as to access and correct it and object to further processing).

This Privacy Notice is intended to ensure that individuals outside our organisation with whom we interact, including visitors to our website, personnel of service providers or other suppliers and others who interact with us whether via our website or by corresponding with us by other means (e.g. by emailing or phoning us) (“you”, or “your”) are aware of the categories of your personal data Ptarmigan Capital Limited (“we”, “us” or “our”) may collect, how we collect it, what we use it for and with whom we share it in accordance with the GDPR.

Your rights in relation to your information

You have rights as an individual which you can exercise in relation to the information we hold about you under certain circumstances. These rights are to:

- › request access to your personal data (commonly known as a “data subject access request”) and request certain information in relation to its processing;
- › request rectification of your personal data;
- › request the erasure of your personal data;
- › request the restriction of processing of your personal data;
- › object to the processing of your personal data;
- › request the transfer of your personal data to another party.
- › If you would like to exercise one of these rights, please contact us.

You have the right to object to how we process your personal information. You also have the right to access, correct, sometimes delete and restrict the personal information we use. In addition, you have a right to complain to us and to the data protection regulator. If you would like further information or to make a complaint, please do not hesitate to contact us. Our contact details are shown here.

- › Andrew Case (Head of Compliance) can be contacted by email (acase@ptarmigancapital.co.uk) or by writing to us at the address shown above.

- › Information Commissioner: ico.org.uk/global/contact-us

Your privacy rights are detailed more fully on the following pages.

Legal basis for collecting/processing information

The legal basis on which most of the information that you provide will be collected and processed is to enable us to provide the financial advice that we have agreed you require.

However, some types of information require your explicit consent. In particular, where we identify that it is relevant to obtain details from you in relation to any adverse health history you might have, we will seek your explicit consent.

Where you have given us consent, you have the right to withdraw it at any time.

Personal Data

“Personal data” means any information relating to you, but does not include data where you can no longer be identified from it such as anonymised aggregated data.

We will be a data controller in respect of your relationship with us. A data controller is responsible for deciding how to hold and use personal data about you. We may process your personal data ourselves or through others acting as data processors on our behalf.

Special Category Personal Data

There are more limited bases for processing special category personal data which require your explicit consent. This is personal data which reveals or contains racial or ethnic origin, political opinions, religious and philosophical beliefs, trade union membership, genetic data, biometric data, health data, sex life and sexual orientation. We do not intend to actively collect special category data about you. Whilst we will use reasonable efforts to limit our holding of such data, please be aware that we may hold such data incidentally. For example, where you volunteer special category data to us, such as if you send us an email containing special category data.

The one special category of personal data where we might identify that it is relevant to obtain details from you is in relation to any adverse health history you might have (as outlined above in Legal Basis for collecting/processing information).

What Kinds of Personal Information We Use

We use information relating to your personal situation and financial position which may include, but is not necessarily limited to, your name, address, place of business, email address, other contact details, corporate contact information, job title, signature, correspondence records, information about how you use our website and other technical data such as your IP address, login data for our web portal, browser type and version, time zone setting and location.

How do we collect this information?

We typically collect personal data about you when you provide information to us or others acting on our behalf:

- › directly from you, usually in a face-to-face meeting but potentially also by telephone or other means;
- › from other organisations such as investment/pension/insurance providers, where you have provided authority for them to share information relating to your existing plans;
- › from your professional advisers, where you have provided authority for them to share information.

- › We may also obtain some personal information from recording calls or meetings or by making contemporaneous notes of calls or meetings.

How we use your personal information

We hold your personal information as Data Controllers in accordance with the requirements of the Data Protection Act 2018.

We use this information to analyse your current and future financial needs so that we can ensure that any subsequent advice takes due account of, and is suitable to, your circumstances.

We will not share your information with any other party except as indicated in this Privacy Statement or where required to do so by any statutory, governmental or regulatory body for legitimate purposes.

Sharing and Transferring Personal Information

Where necessary to the provision of our service, we may share your personal information with third parties. The categories of third party are listed below.

We may need to share your personal data with:

- › professional advisers including lawyers, bankers, auditors and insurers, pension providers, providers of pension transfer comparison reports to the extent such information is relevant to their performance of their services;
- › Your selected custody bank;
- › Money Laundering and Know Your Client Provider;
- › Our Back Office System Provider;
- › Our Compliance Advisor, Thistle Initiatives;
- › regulators; and
- › any of our service providers where such information is relevant to their performance of such services;

We may also need to share your personal data with a regulator or to otherwise comply with applicable law or judicial process or if we reasonably believe that disclosure is necessary to protection our rights and/or to comply with judicial or regulatory proceedings, a court order or other legal process.

We will confirm the actual third parties with whom we will share your information when we have identified the product/service providers that we recommend you use. This will usually be done in our suitability report in which we will detail our recommendations to you.

Until you have been informed of the actual third parties with whom we will share your information, and provided that you have not terminated our contract or otherwise objected to that sharing, we will only share in a way that does not enable the third party to identify you.

Where necessary to implement the service that you require, your personal information might be transferred to other countries outside the UK, but only to jurisdictions where suitable protection is in place.

What if you do not provide the personal data requested?

Unless and until you make a decision to invest or otherwise engage in a business transaction with us or invest in one of our investment products (at which point we will send you a copy of any relevant privacy notice) you are not required to provide us with any information although please note that our website may automatically collect certain technical data (further details on this are in the 'How do we collect this information?' section).

Change of purpose

We will only use your personal data for the purposes for which we collected it (as identified above in the 'Purpose' column), unless we reasonably consider that we need to use it for another reason which is compatible with the original purpose. If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Keeping personal information

We keep your personal information securely for as long as we need to for the purpose of providing you with financial advice under the terms of our service/fee agreement (contract) or for as long as we are required to by relevant regulations.

Accuracy of information

It is important that the personal data we hold about you is accurate and current. Please let us know if your personal data which we hold changes during your relationship with us.

Fees

You will not usually have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is manifestly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

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 data is not disclosed to any person who has no right to receive it.

Changes to this privacy notice

We reserve the right to update this Privacy Notice at any time, and we will make an updated copy of such Privacy Notice available to you and notify you when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal data.