

INFORMATION ABOUT THE PRIVACY OF YOUR DATA

Privacy Notice



THE THOUGHTFUL INVESTOR

PRIVACY NOTICE

WHO ARE WE?

Castlefield is a family of investment and advisory businesses comprising of Castlefield Investment Partners LLP, Castlefield Advisory Partners Ltd, Castlefield Fund Partners Ltd and Castlefield Corporate Advisory Partners Ltd. Our group holding company is Castlefield Partners Limited. Whenever you see us speak about 'Castlefield' in this document we mean our whole group of companies.

For the purposes of data protection regulation, we're a 'data controller'. This means that we have responsibility for the data that we collect and we must exercise control over its processing in the course of our work. We must determine the purposes for our collecting your personal data in the first place and then monitor the way in which we process it, to make sure that we meet strict data protection regulations.

WHAT IS THIS NOTICE ABOUT?

On 25th May 2018 the General Data Protection Regulation (GDPR) comes into force in the UK and across Europe. The aim is to reshape and enhance the way that all organisations approach data privacy, making them more accountable for the way that they process and manage personal data and giving greater rights of protection to data subjects of the EU.

This notice will show you what we have done and will continue to do at Castlefield to meet the requirements of GDPR. It'll explain what data we collect about you, what we use it for and how we use it.

WHAT DO WE MEAN BY INFORMATION?

This notice will refer to 'personal data'. This means any information that can be used to identify a living individual and that can be used to distinguish between individuals.

It can apply to data that's already in the public domain or restricted personal data that you disclose to us.

In addition, there are extra regulations around 'sensitive personal data'. This is data of a more personal nature, which could feasibly be misused against an individual. At Castlefield we might collect sensitive personal data where we need it to provide a service to you. For example, to provide financial advice relating to your pension planning we may ask you questions about your health and medical condition, or to ensure that the investment products we supply to you are suitable we must ask for information relating to your financial situation. We'll only collect sensitive personal data where there is a lawful basis for us to do so.

Although GDPR, the data protection law that governs all organisations, specifically applies to living people, at Castlefield we take the view that personal information relating to deceased individuals should be treated in the same way as the living, and we apply the same restrictions to the way we process it.

HOW DO WE COLLECT YOUR INFORMATION?

In the main we'll ask you directly for your information so that we can use it to provide a service to you. For example, we'll ask for your address and telephone details so that we can contact you to discuss your investments. If you are ever unsure about providing information to us, one of the Castlefield team will be happy to explain more about why we're asking and how we'll use your data.

If Castlefield's services have been recommended to you by a third party, for example an external financial advice or investment firm, we may have received your information indirectly after you've given that party permission to share it with us.

WHY DO WE COLLECT YOUR INFORMATION AND HOW DO WE USE IT?

In a nutshell, we'll use your information to carry out the work that we need to do to provide the best service to you. If you don't provide information to us we might not be able to offer you the intended service; or at least not to its fullest extent.

Here are some examples of the types of information we might ask you for, what we do with it and the legal reasons we have for processing it:

- Your name, address and contact details are requested on our forms when you enquire about our financial advice or investment management services, or if you invest in one of our funds. We need these to fulfil our duties according to our contract with you and to contact you when we need to. We'll also let you know about other services offered by Castlefield if they're appropriate and we think you'd be interested
- We collect information to confirm your identity, such as your National Insurance Number, and any previous names and addresses. We'll also ask for proof of identity documentation, such as your passport, driving licence or recent utility bills. We need this information to confirm your identity and meet the legal obligations set out for us by our regulators, to prevent money laundering and help to detect criminal activity
- Information will be collected about your accounts with us and any accounts we advise you on, including cash movements and transactions on those accounts. This information allows us to advise you properly on your assets according to the contract we have with you, but we may also need it to fulfil reporting obligations set out by our regulators, such as sending you annual declarations of costs and charges, suitability reports or portfolio valuations
- Key information about the performance of your assets may be used to assess the competence of authorised persons within Castlefield, such as our financial advisers and investment managers. As far as possible we anonymise information to do this, but it isn't always appropriate. This type of monitoring is a regulatory requirement, but is also in the legitimate interests of Castlefield and all of our clients, to ensure that we are providing high standards of ongoing service

WHO MIGHT WE SHARE YOUR INFORMATION WITH?



We won't sell or pass your data to any third parties outside of our group of companies for marketing or research purposes. However, if we think a product or service offered by Castlefield would be of interest to you we may contact you to tell you about it.

Because we're a business with social responsibility at our core you can trust that we'll always try to keep mailings to a minimum. Occasionally though we might like to keep you informed about Castlefield products, events and opportunities. You can opt out of this at any time by emailing opt-out@Castlefield.com.

On occasion we might need to share your information with third parties outside of Castlefield who we use to carry out certain activities. This is usually either to allow us to arrange or provide a service and fulfil our contract with you, or because of a regulatory or legal requirement.

Here are some of the times we might currently share your data and why:

- To conduct identity verification checks, we use third party agencies. It's a legal requirement that Castlefield complete these checks, as it is for any other regulated financial services company. The agencies we currently use are: 'Sanctions Search' provided by The Professional Office Limited and GBG Plc
- Castlefield works with a number of external providers to deliver our products and services to you. For example, we may use an external custodian to hold your investments or utilise a webmail service to send a communication to our clients. We conduct due diligence on the parties we choose to work with including, amongst many things, checking to ensure that they have sufficiently robust data protection policies and procedures in place of their own
- We are legally obliged to share information, on request, with our regulatory and supervisory authorities, including the Financial Conduct Authority (FCA), the Information Commissioner's Office (ICO) and the Financial Ombudsman Service (FOS)
- In some instances, we may be required to share information with law enforcement agencies in the detection and prevention of crime. This would happen where there is a legal requirement or if it were in the public interest
- We may share your information with HMRC for tax reporting purposes, if we have a legitimate interest in doing so. One example of this is where we send annual reports to HMRC relating to our clients' ISA accounts

WHAT DO WE DO TO PROTECT THE SECURITY OF YOUR INFORMATION?

Data protection is at the centre of our operational culture here at Castlefield. All employees undergo regular data protection training and sign annual declarations to say that they'll adhere to the strict codes of practice required of them.

We use the services of a local, UK based IT firm, 'Ashmore IT', who carry out regular testing to ensure our software systems and servers are protected by rigorous e-safety measures, such as using data encryption, firewalls and password protection.

Most of our employees are based at our office in Manchester, which is our headquarters. We mainly store your data electronically on our servers in a secure UK data centre. Access is strictly controlled so that only authorised personnel can use it. When we receive or use your data in a physical form we have strict procedures surrounding this too. For example, we operate a clear desk policy, whereby all physical documents are locked securely away when we're not using them, and are shredded when no longer required.

Some of our employees, such as our financial advisers, need to gain remote access to our computer systems outside of the office. When they do so, they use devices that are securely protected by measures that are at least equal to those we use for our office based systems. These measures include strict password protection and where possible, data is encrypted so that anybody attempting to intercept would not be able to read it.

HOW LONG DO WE KEEP HOLD OF YOUR INFORMATION?

We'll retain your information for as long as we're providing our professional services to you. If you decide to end your relationship with Castlefield, we'll keep your information on file for as long as we have a legal requirement to do so.

We're subject to regulatory requirements to retain your data for specified minimum periods. These include five years for investment business, three years for insurance business and indefinitely for any pension transfers and opt-outs.

Exactly how long we'll need to keep your data on file will vary depending on the individual case, however we aim to retain personal information for no longer than we have a legal basis on which to do so.



THE RIGHTS OF ACCESS THAT YOU HAVE TO YOUR DATA

You have the right to request a copy of the information that we hold about you. Please write to us at the following address.

THE DATA PROTECTION OFFICER

Castlefield Partners Limited
111 Piccadilly
Manchester
M1 2HY

The GDPR introduces further rights for data subjects in the UK including their right to be informed, right to rectification, right to restrict processing and right to erasure (also known as the 'right to be forgotten'). You can find out more about these from the Information Commissioner's Office's own website: www ICO.org.uk.

As you can appreciate, the way that we would approach each of these rights here at Castlefield, would depend on the specific nature of the individual request. If you would like to know more about the provisions that we've put in place please contact us at the above address or ask your usual contact, who would be happy to explain further.



ABOUT THIS PRIVACY NOTICE

Please contact us at the above address if you have any further questions about this privacy notice. You can also speak to your usual contact at Castlefield, who would be happy to provide you with more information about this notice and answer any questions that you may have.

In line with our ongoing commitment to data protection we keep our privacy policy under regular review.

This policy will be published on our website, www.castlefield.com, where any changes will also be kept up to date. The most recent version of this policy was published in May 2018.





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