

Privacy Notice

This privacy notice sets out how Cavendish Asset Management Limited (“Cavendish”) will process personal information. It explains why we collect personal information, what personal information we collect and how we use it. It also explains the rights you have in respect of the personal information we hold for you.

About Cavendish

Cavendish is a UK investment management company that is registered in England and Wales under Registered No. 735076; and whose Registered Address is Chelsea House, West Gate, London; W5 1DR.

Cavendish Asset Management Limited is also Authorised and Regulated in the UK by the Financial Conduct Authority (“FCA”) under Firm Reference Number (“FRN”) 116252.

Cavendish processes personal information as a ‘Data Controller’. This term means that Cavendish determines the purposes and means of processing personal information.

Why we collect personal information

We collect and use personal information to provide our service or product to you and to comply with our legal and regulatory obligations; as follows:

- managing and administrating your investment account you may hold or is in the process of applying to open with Cavendish, including complying with our regulatory obligations under the FCA’s suitability and appropriateness requirements,
- to carry out anti-money laundering (“AML”) checks for the prevention of money laundering, terrorist financing, bribery, corruption, tax evasion and to prevent the provision of financial and other services to persons who may be subject to economic or trade sanctions, on an on-going basis,
- for the prevention of fraud,
- to comply with our legal obligations to report tax related information to tax authorities,
- to comply with our legal and regulatory obligations to report to regulators and other competent authorities,
- to monitor and record calls and electronic communications for investigation and fraud prevention purposes, for crime detection, prevention, investigation and prosecution, and to enforce or defend Cavendish’s legal or contractual rights,
- to monitor and record calls for quality, business analysis, training and related purposes.

Marketing

Cavendish does not use your personal information for marketing purposes.

The personal information we collect

We may collect the following types of personal information about you:

- Contact details such as:
 - name,
 - address,
 - telephone number,
 - email address,

- Identification information such as:
 - signature,
 - date of birth,
 - gender,
 - nationality,
 - residency,
 - national insurance number,
 - passport number,
 - driving licence,
 - birth certificate,
 - marriage certificate,
 - other national identity number,
 - tax identification numbers,
 - your utility bills,
- Information to understand your investment goals and circumstances such as:
 - occupation, employment status, employer, job title, qualification,
 - marital status,
 - investment goals
 - financial details, income, assets, liabilities, investments
 - tax rate,
 - bank account details,
- Recording and monitoring of telephoning calls,
- Other special or sensitive personal information such as:
 - information about your lifestyle, health or concerning criminal proceedings and offences.

Who do we share your information with

- Affiliates and third party vendors including our IT providers to process the information for the above mentioned purposes,
- To competent authorities, including regulatory and tax authorities, courts and other bodies as required by law or regulation,
- To credit reference agencies (e.g. Experian) to carry out money laundering and identity checks and comply with legal obligations,
- Our appointed auditors, accountants, lawyers and other professional advisers, to the extent that they require access to the information to provide advice or other services to Cavendish.

Transferring information outside the European Economic Area (“EEA”)

Cavendish does not transfer personal information outside the EEA.

How we ensure the security of your personal information

Cavendish has in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to use your personal information. They will only process your personal information on our instructions and are subject to a duty of confidentiality.

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. As part of our data security measures we ensure that we train our employees and have appropriate data protection policies in place to support our compliance.

How long do we retain your personal information

Cavendish will retain your personal information for as long as is required to perform the service we provide to you. We will retain your personal information in accordance with the purposes for which it was collected, and with the legal and regulatory obligations we must comply with. Where the personal information is no longer required, we will ensure that it is disposed of in a secure manner.

Your rights in connection with your personal information

You have the following rights, in certain circumstances, in relation to your personal information:

- Right to access your personal information.
- Right to rectify your personal information.
- Right to restrict the use of your personal information.
- Right to request that your personal information is erased.
- Right to object to the processing of your personal information.
- Right to data portability (in certain specific circumstances).
- In the event you were to provide your consent to the use of your personal information for marketing purposes, you would also have the right to withdraw your consent at any time. However please be reminded as explained above, Cavendish does not use your personal information for marketing purposes.

How to exercise your rights

You can make a request by contacting Cavendish in any of the ways set out in the '**How to contact us**' section below.

However, in addition we may always ask you to confirm your request in writing.

You will not usually have to pay a fee to exercise any of your rights. However, we may charge a reasonable administration fee, or not comply with a request, if a request is clearly unfounded, excessive, repetitive or unreasonable.

We may need to request specific information from you to help us confirm your identity and ensure you have the right to access the information you request (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not inappropriately disclosed to any person.

How to complain

Please contact us in any of the ways set out in the '**How to contact us**' section below if you wish to raise a concern about our handling of your personal information.

However, you also have the right to make a complaint at any time to the Information Commissioner's Office ("ICO"), the UK supervisory authority for data protection issues. You can contact the Information Commissioner's Office at:

Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

or telephone
0303 123 1113
www.ico.org.uk

How to contact us

Address:
Operations Manager,
Cavendish Asset Management Limited,
West World, West Gate,
London,
W5 1DT.

Phone: 020 8810 8041

Email: sarah.king@ltg-group.co.uk

Changes to our privacy notice

This privacy notice was last updated in May 2018.

We keep our privacy notice under regular review and we may update this policy and place a new version on our website. You should check the 'Literature' page of our website at <http://www.cavendisham.co.uk/Literature#> occasionally to ensure you are happy with any changes. In addition, we will advise you when we make any substantial update to this privacy notice.