

# Data Protection Policy

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Your personal data is data which by itself or with other data available to us can be used to identify you. MASECO LLP is a data controller and this statement sets out how we will use your personal data, the legal grounds for our use of your personal data and what your rights are in respect of the personal data which we hold, control and process, such as the right to move, copy or transfer your personal data ("data portability"). You can contact our Chief Operating Officer at Burleigh House, 357 Strand, London WC2R 0HS if you have any questions. The purpose of this Policy is to explain how we process your data in order to provide you with our services, how we collect your data, how we hold it securely and ensure that it is accurate, how you can gain access to the personal data we hold about you and the arrangements we have in place to ensure that we do not hold it for longer than is necessary.

## 1. Type of personal data we collect and use

Whether or not you become a client of ours, we will use the personal data you provide us with or which we obtain through other means (e.g. from social media) for the purposes set out below. If you become a client, we will use your personal data to provide you with the services with which we have agreed to provide you. Where we obtain personal data from sources other than you, this is mentioned in this statement. The personal data we use includes:

- Your name and personal details including contact information (such as your primary and other residential address; your business address; your email address; business and personal mobile telephone numbers; your unique tax identifier, such as your National Insurance number); your driving license and/or passport details;
- Your date of birth and/or age;
- Financial details, such as your salary and details of any other income and accounts held with other providers;
- Records of products and services you have held, how you have used them and the relevant technology used to access or manage them;
- Biometric data;
- Information from credit reference or fraud prevention agencies, electoral roll, court records of debt judgements and bankruptcies and other publicly available sources as well as information on any financial associates you may have, for example, through social and other media, such as LinkedIn;
- Family, lifestyle or social circumstances where relevant for the service with which we will provide you, such as the date of birth and/or age of any dependents (in order to assist us with financial planning);

- Education and employment details including employment status for credit and fraud prevention purposes and to assist us in understanding your level of knowledge and ability to understand the nature and associated risks of the services with which we may provide you; and
- Personal data about other named applicants, in which instances, you must have their authority to provide us with their personal data and you must provide them with a copy of this statement before providing us with any of their personal data and confirm to us the details of what you have agreed on their behalf.

## 2. Providing personal data

We will let you know if providing some personal data is optional including if we ask for your consent to process it. In all other cases, you need to provide your personal data otherwise this may affect our ability to provide you with our services.

## 3. Monitoring of communications

Subject to applicable law and regulation, we will monitor and record your telephone calls, emails, text messages and other communications in relation to your dealings with us. We will do this for regulatory compliance, self-regulatory best practices, crime prevention and detection, to protect the security of our communications systems and procedures, to check for obscene or profane content, for quality control and staff training and when we need to see a record of what has been said, for example, when investigating a complaint. We may also monitor activities on your account where necessary for these reasons and this is justified by our legitimate interests or our legal obligations.

## 4. Using your personal data: Legal basis and purpose

We will access your personal data:

- a. as necessary to perform our contract with you for the relevant service, including:
  - i. to manage and perform that contract;
  - ii. to update our records;
  - iii. to trace your location to contact you about your portfolio and recover any outstanding payments.
- b. as necessary for our own legitimate interests or those of other persons or organisations or regulatory authorities, including:
  - i. for good governance, accounting, managing and auditing of our business operations;

- ii. to monitor emails, telephone calls and other communications and activities on your portfolio;
  - iii. to send you marketing information about our services.
- c. as necessary to comply with a legal obligation, including:
- i. to ensure compliance with legal and regulatory requirements
  - ii. to establish and defend legal rights;
  - iii. for activities relating to the prevention of crime;
  - iv. to verify your identity and make credit, fraud prevention and anti-money laundering checks;
  - v. to monitor emails, telephone calls and other communications and activities on your portfolio.
- d. based on your consent:
- i. where you request us to disclose your personal data to other people or organisations, such as your tax advisers or solicitors, or otherwise agree to disclosures;
  - ii. where we process any sensitive personal data (such as your racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, biometric data or data concerning your physical or mental health, gender orientation or sex life);
  - iii. send you marketing communications where we have asked for your consent to do so.
- g. courts in the UK and overseas, to comply with legal requirements, and for the administration of justice;
  - h. in an emergency situation or to otherwise protect your interests;
  - i. to protect the security or integrity of our business;
  - j. other parties connected with your portfolio e.g. power of attorney, and other people named on the Client Profile as having authority in relation to your portfolio, including joint account holders who will see your transactions;
  - k. if we restructure or sell the business or its assets or have a merger or re-organisation, including a change of legal person;
  - l. market research organisations engaged by us to improve our services;
  - m. anyone else where we have your consent or as required by applicable law and regulation.

## 6. International transfers

Your personal data may be transferred outside the UK and the European Economic Area. While some countries have adequate protections for personal data under applicable law and regulation, in other countries we will take the necessary steps to ensure appropriate safeguards apply. These include imposing contractual obligations of adequacy or requiring the recipient to subscribe or be certified with an 'international framework' of protection.

## 5. Sharing your personal data

Subject to applicable data protection law, we may share your personal data with:

- a. other persons or companies who assist us in providing our services, such as the software suppliers of the risk modelling tool we ask clients to complete;
- b. the manufacturers of the products in which we may invest your portfolio to the extent required by applicable law and regulation, for example, where the manufacturer demands confirmation that its product has been distributed by us to the target market identified by the manufacturer;
- c. our legal and other professional advisers;
- d. fraud prevention agencies, credit reference agencies both at the time we commence the provision of our services and periodically during the term of our appointment;
- e. other organisations who use shared databases for identify and income verification;
- f. government bodies and agencies in the UK and overseas (e.g. HM Revenue & Customs who may in turn share it with relevant overseas tax authorities and with regulators, such as the Financial Conduct Authority, the Securities & Exchange Commission in the US and the UK's Information Commissioner's Office);

## 7. Identity verification and fraud prevention checks

We will supply your personal data to credit reference agencies in order to verify your identity. When we carry out a search at a credit reference agency, this will place a footprint on your credit file. If you are a director of a company incorporated in the UK, we will seek confirmation from the credit reference agencies that the residential address you provide is the same as that shown on the restricted register of directors' usual addresses at Companies House.

The personal data we collect from you at the beginning of the client onboarding process and thereafter will be shared with fraud prevention agencies who will use it to prevent fraud and money laundering and to verify your identity. If fraud is detected, you could be refused certain services, finance or employment in the future. We may also search and use our internal records for these purposes.

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## 8. Your marketing preferences

We will use your home address, telephone numbers, email address and social media (such as Facebook) to contact you according to your preferences. You can change your preferences or unsubscribe at any time by contacting us.

If you have previously told us that you don't want information on other services we provide or to be included in market research, we will continue to respect your wishes.

## 9. Data retention

We will retain your personal data for 6 years after the date on which you cease to be a client. After this time, we will review the personal data we hold on record about you and determine whether we still have a legitimate interest in that data (for example, we are dealing with a complaint) or not. If not, we will arrange for the data to be destroyed or anonymised subject to any applicable legal or regulatory requirements which require us to continue to hold such data.

## 10. Data anonymisation and aggregation

Your personal data may be converted into statistical or aggregated data which can't be used to identify you, then used to produce statistical research, reports and regulatory filings. This aggregated data may be shared and used in all the ways described in this notice.

## 11. Visiting our offices

We have CCTV in operation at our offices. CCTV will capture images in real time wherever the cameras are pointed and these cameras will capture footage of you whilst you are on the premises. We collect and process personal information via the CCTV system for the following purposes:

- a. to ensure the health and safety of employees and visitors to our offices;
- b. to detect, prevent or reduce the incidence of crime;

- c. to prevent and respond effectively to all forms of possible harassment and disorder; and
- d. to assist with employment issues, for example, discipline, where appropriate to do so.

We may be asked to provide footage to assist any law enforcement agency with any criminal damage or other investigation. We may also be asked for footage from insurance companies should there be an incident involving an accident on the premises. However, there is no planned regular or scheduled sharing of CCTV footage with any third party.

The CCTV system will keep footage for 4 days at which point it will be automatically overwritten by the system.

## 12. Your rights under applicable data protection law

The EU GDPR gives you the following rights as a 'data subject':

- a. the right to be informed about how we will process your personal data;
- b. the right to have your personal data corrected if it is inaccurate and to have personal data completed;
- c. the right to object to our processing of your personal data;
- d. the right to restrict processing of your personal data;
- e. the right to have your personal data deleted (known as the "right to be forgotten");
- f. the right to request access to your personal data and information about how we process it;
- g. the right to move, copy or transfer your personal data ("data portability"); and
- h. rights in relation to automated decision making including profiling.

You also have the right to complain to the UK's Information Commissioner's Office. It has enforcement powers and can investigate compliance with data protection law. Their website is [ico.org.uk](http://ico.org.uk). For more details on all of the above you can contact our Chief Operating Officer at Burleigh House, 357 Strand, London WC2R 0HS, United Kingdom.

