



OWL PRIVATE OFFICE

PRIVACY NOTICE

1. Data protection

Owl Private Office LLP (OWL) takes your privacy seriously. OWL adheres to high data protection standards as well as transparency of personal data collection and processing for our clients. This privacy notice contains general information on what personal data OWL collect, what they do with that information, and what rights you have. If you have any questions or comments, please contact info@owlprivateoffice.com

'Personal data' is any information that relates to an identified or identifiable natural person (rather than to a legal entity, such as a company).

As part of our commitment to protect your personal data in a transparent manner, we want to inform you:

- why and how OWL collects, uses and stores your personal data;
- the lawful basis on which your personal data is processed; and
- what your rights and our obligations are in relation to such processing.

2. What types of personal data do we collect?

OWL will, depending on the product or service we provide to you (if any), collect and process personal data about you including:

- personal details such as your name, identification number, date of birth, know your client (KYC) documents (including a copy of your passport or national identity card), phone number physical and electronic address, and family details such as the name of your spouse, partner, or children;
- financial information, including information relating to your assets (including fixed properties), financial statements, liabilities, taxes, revenues, earnings and investments (including your investment objectives);
- tax domicile and other tax-related documents and information;
- where applicable, professional information about you, such as your job title and work experience;
- your knowledge of and experience in investment matters;
- details of our interactions with you and the products and services you use;
- We do not currently record phone calls between you and OWL but we do keep contemporaneous notes of our calls;
- Where we have your email address stored in our CRM, we track and store email communications between you and OWL;
- where applicable, Power of Attorney details;
- identifiers we assign to you, such as your client codename;
- when you access our Website, data transmitted by your browser and automatically recorded by our website service provider (www.wordpress.com), including date and time of the access, name of the accessed file as well as the transmitted data volume and the performance of the access, your web browser, browser language and requesting domain, and IP address (additional data will only be recorded via our Website if their disclosure is made voluntarily, e.g. in the course of a registration or request). When you visit the OWL website, that website will contain additional information about how we use your information while you are visiting that website; and

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- in some cases (where permitted by law), special categories of personal data, such as your health information, and, to the extent legally possible, information relating to criminal convictions or offences.

In some cases, we collect this information from public registers (which, depending on the product or service you receive, may include beneficial ownership and other registers), public administration or other third-party sources, such as wealth screening services, credit reference agencies and fraud prevention agencies.

If relevant to the services we provide to you, we will also collect information about additional third parties related to you including, business partners (including other shareholders or beneficial owners), dependants or family members, representatives, and agents. Before providing OWL with this information, you should provide a copy of this notice to those individuals.

3. On which legal basis and for which purposes do we process personal data?

3.1 Legal basis for processing

Depending on the purpose of the processing activity (see section 3.2), the processing of your personal data will be one of the following:

- (i) necessary for the legitimate interests of OWL, without unduly affecting your interests or fundamental rights and freedoms (see below);
- (ii) necessary for taking steps to enter into or executing a contract with you for the services or products you request, or for carrying out our obligations under such a contract, such as when we use your data for some of the purposes in sections 3.2(a), (b) and (c) as well as certain of the data disclosures described in section 4);
- (iii) required to meet our legal or regulatory responsibilities, including when we conduct the checks referred to in section 3.2(a) below and make the disclosures to authorities, regulators and government bodies referred to in sections 3.2(e) and 4 below;
- (iv) in some cases, necessary for the performance of a task carried out in the public interest;
- (v) when we use special categories of personal data, necessary for establishing, exercising or defending legal claims or where the processing relates to personal data manifestly in the public domain; and
- (vi) in limited circumstances, processed with your consent which we obtain from you from time to time (for instance where required by laws), or processed with your explicit consent in the case of special categories of personal data.

Examples of the 'legitimate interests' referred to above are:

- pursuing certain of the purposes in sections 3.2(a) to 3.2(i) below;
- when we make the disclosures referred to in section 4 below, providing services and assuring a consistently high service standard across our business, and keeping our customers, employees and other stakeholders satisfied.; and
- meeting our accountability and regulatory requirements,

in each case provided such interests are not overridden by your privacy interests.

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Any consent OWL has obtained to process ordinary personal data does not apply for the purposes of the EU General Data Protection Regulation 2016/679 ("GDPR"). Instead, for the purposes of the GDPR, OWL relies on the lawful grounds of compliance with a legal obligation, contractual necessity or legitimate interests (as specified in this notice) and OWL's ability to rely on any such consent for the purposes of the EU GDPR is hereby waived or extinguished.

Where the personal data we collect from you is needed to meet our legal or regulatory obligations or enter into an agreement with you, if we cannot collect this personal data there is a possibility we may be unable to on-board you as a client or provide products or services to you (in which case we will inform you accordingly).

3.2 Purposes of processing

We always process your personal data for a specific purpose and only process the personal data which is relevant to achieve that purpose. In particular, we process personal data for the following purposes:

- a) our client take-on processes, including to verify your identity, and to conduct legal and other regulatory compliance checks (for example, to comply with anti-money laundering regulations, and prevent fraud);
- b) managing our relationship with you, including communicating with you in relation to the services you obtain from us and from our business partners, handling customer service-related queries and complaints;
- c) helping us to learn more about you as a customer, the services you receive, and other services you may be interested in receiving, for instance by looking at the types of products and services that you use from us, how you like to be contacted and so on;
- d) taking steps to improve our services and our use of technology, including testing and upgrading of systems and processes, and conducting market research to understand how to improve of our existing services or learn about other services we can provide;
- e) meeting our on-going regulatory and compliance obligations (e.g. laws of the financial sector, anti-money-laundering and tax laws), including in relation to recording and monitoring communications, disclosures to tax authorities, financial service regulators and other regulatory and governmental bodies, and investigating or preventing crime;
- f) ensuring the safety of our customers, employees and other stakeholders;
- g) undertaking transactional and statistical analysis, and related research;
- h) for the business' prudent operational management (risk management, insurance, audit, systems and products training and similar administrative purposes); and
- i) any other purposes we notify to you from time to time.

4. Who has access to personal data and with whom are they shared?

4.1 Within OWL

OWL employees have access to personal data in order to ensure a consistently high service standard across our business, and to provide services to you.

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4.2 Third Parties

When providing services to you, we will obtain explicit consent in order to share personal data with persons acting on your behalf or otherwise involved in the transaction (depending on the type of service you receive from us), including, where relevant the following types of companies.

- other financial institutions, credit reference agencies or credit bureaus (for the purposes of obtaining or providing credit references);
- any third-party fund manager who provides asset management services to you; and
- any introducing broker or intermediary (e.g. Lawyer, Accountant, Tax Adviser) to whom we provide introductions or referrals.

4.3 Service providers

In some instances, we also share personal data with our suppliers, including other business partners who provide services to us, such as IT and hosting providers, communication services, credit reference agencies, and others. When we do so we take steps to ensure they meet our data security standards, so that your personal data remains secure.

4.4 Public or regulatory authorities

If required from time to time, we disclose personal data to public authorities, regulators or governmental bodies, including when required by law or regulation, under a code of practice or conduct, or when these authorities or bodies require us to do so.

4.5 Others

- We may need to disclose personal data to exercise or protect legal rights, including ours and those of our employees or other stakeholders, or in response to requests from individuals or their representatives who seek to protect their legal rights or such rights of others.

5. International transfers of personal data

The Recipients referred to in section 4 above may be located outside the UK. In those cases, except where the relevant country has been determined by the Information Commissioner's Office to provide an adequate level of protection, OWL requires such recipients to comply with appropriate measures designed to protect personal data contained within a binding legal agreement. If and to the extent required by applicable law, we implement the necessary legal, operational and technical measures and/or enter into an agreement with you before such transfers.

6. How long do we store your data?

We will only retain personal data for as long as necessary to fulfil the purpose for which it was collected or to comply with legal, regulatory or internal policy requirements. To help us do this, we apply criteria to determine the appropriate periods for retaining your personal data depending on its purpose, such as facilitating client relationship management, and responding to legal claims or regulatory requests. Examples of retention periods are set out in section 11 below.

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7. Your rights

You have a right to ask OWL to rectify inaccurate personal data we collect and process and the right to request restriction of your personal data pending such a request being considered.

Where we process your personal data on the basis of your consent, you have the right to withdraw that consent at any time. Please also note that the withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.

You have a right to ask us to stop processing your personal data, or to request deletion of your personal data – these rights are not absolute (as sometimes there may be overriding interests that require the processing to continue, for example), but we will consider your request and respond to you with the outcome.

Where we process your personal data on the basis of your consent, or where such processing is necessary for entering into or performing our obligations under a contract with you, you may have the right under applicable data protection laws to request your personal data be transferred to you or to another controller. You have the right to ask OWL for a copy of some or all of the personal data we collect and process about you.

You can exercise the rights set out above by contacting us using the details in section 8 of this notice.

8. Exercising your rights, and complaints

If you are not satisfied with any aspect of the processing of your personal data by OWL, we would like to discuss it with you to understand how we can rectify the issue. If you would like to speak to us about our use of your personal data, you can do this:

- by contacting an employee of OWL or
- by contacting info@owlprivateoffice.com

If you are not satisfied with OWL's response, you have the right to make a complaint to the data protection authority in the jurisdiction where you live or work, or in the place where you think an issue in relation to your data has arisen.

If you wish to make a subject access request, please request a subject access request form from info@owlprivateoffice.com

9. Security Note

We have in place appropriate technical and organisational measures to prevent unauthorised or unlawful access to the personal data you have provided to us. As complete data security cannot be guaranteed for communication via e-mails, instant messaging, and similar means of communication, we would recommend sending any particularly confidential information by an alternative secure means and using appropriate passwords when using unsecure mediums of communication.

10. Changes to personal data

We are committed to keeping your personal data accurate and up to date. Therefore, if your personal data changes, please inform us of the change as soon as possible.

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11. Example of retention periods

In general, OWL will retain personal data for the period of your relationship or contract with OWL plus 7 years, reflecting the length of time for which legal claims may be made following termination of such relationship or contract. An ongoing or anticipated legal or regulatory proceeding may lead to retention beyond this period. Due to requirements laid down by the Financial Conduct Authority (FCA), OWL must furthermore store all electronic correspondence (e-mails, etc.) and evidence of any calls made on business telephones by employees for a period of 7 years. OWL must also make this information available to the FCA on demand. OWL also stores all incoming and outgoing business and private communication data (in particular e-mails with attachments) in a separate, protected electronic archive located in Ireland for a period of 7 years.

12. Status of this privacy notice

This privacy notice was updated in May 2018. It is a notice explaining what OWL does, rather than a document that binds OWL or any other party contractually. We reserve the right to amend it from time to time. If the notice has been updated, we will take steps to inform you of the update by appropriate means, depending on how we normally communicate with you, such as through your account statement.

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