

ALVARIUM

Alvarium Data Privacy Notice

Alvarium (comprising Alvarium Investments Limited, as defined below, and its subsidiaries and other associated companies) is committed to protecting and respecting your personal data.

This data privacy notice, together with any other documents referred to in it, sets out the basis on which Alvarium group companies in the UK and Portugal will process any personal data we hold about you. If you use the services of any Alvarium group company outside of the UK or Portugal, please review the applicable privacy notice(s) in respect of such services.

Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it. Alvarium may make amendments to this data privacy notice from time to time. We will notify you of any material changes to this privacy notice by email if the changes impact how we will process your personal data. We will also post any revised notice on our website at <https://alvariuminvestments.com/legal-information/> and on <https://gwmp.pt/>. We may notify you in other ways from time to time about the processing of your personal data.

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

In this data privacy notice, the term “personal data”, "data controller”, “process” and "processing" shall have the meanings ascribed to them in the General Data Protection Regulation (EU/2016/679) ("GDPR") and in any implementing or replacement UK legislation.

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1. About us

Alvarium Investments Limited is a company registered in England and Wales with company number 09111421 and with its registered office at 10 Old Burlington Street, London W1S 3AG.

The Alvarium group comprises many different entities which provide different services. When we mention “**Alvarium**”, “**we**”, “**us**” or “**our**” in this privacy notice, we are referring to the relevant company or companies in the Alvarium group in the UK and/or Portugal responsible for processing your data. We will make clear to you which Alvarium entity is providing the services which you receive. Please contact us if you are unsure which entity is providing you with services.

Alvarium Investments Limited is registered as a data controller with the UK Information Commissioner's Office under registration number ZA311052.

2. What personal data we collect and how we collect your personal data

In most cases, we will hold personal data which has been given to us by you or by your representative, including your family members or person you have appointed to deal with us on your behalf. This will include:

- names, contact details and other verification of identification, including information about your tax residency;
- financial and career information, for example the amount of experience you have in dealing with financial instruments and information about your investment objectives;
- information about your preferences and priorities in respect of the services we provide to you, for example your attitude towards risk;
- details of your lifestyle and social circumstances, such as information about your dependents and about the assets which you own; and
- other information necessary or ancillary to our provision of our services to you, which will depend on the nature of the services which we agree to provide to you.

We do not usually collect 'special categories' of personal data unless you have specifically asked us to. 'Special categories' of data are categories of data that might be considered to be more sensitive and are therefore subject to more protection, such as details about your health. We may also collect information in respect of actual or alleged criminal offences as part of our standard anti-money laundering and 'know your client' procedures.

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with our services). In this case, we may have to cancel the service(s) you have with us but we will notify you if this is the case at the time.

Where you have a relationship with one of our group companies, your information (including personal data) may be shared with other companies within the Alvarium group. This will only happen if these group companies assist in the provision of services to you.

In some cases, we will also receive information from third parties. This usually occurs if we use the services of a third party to assist us in meeting our legal or regulatory obligations, for example

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by assisting us in verifying your identity, and in respect of identifying any actual or alleged offences.

3. How and why we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- **Where we need to perform the contract we are about to enter into or have entered into with you.**

We will use your personal data to provide you with the services that we have agreed. For example, we will need your contact and identity data to enable us to provide our services to you.

- **Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.**

We will use your personal data to notify you about any changes to our services or this privacy notice.

If you are a current or former client, will we use your personal data to provide you with information about other services we offer that we feel may be of interest to you. You will receive marketing communications from us unless you have opted out of receiving such communications.

We will also use your personal data for our own internal business purposes, including (but not limited to) record-keeping, monitoring, our own regulatory compliance and analysing the performance of our services, for our internal administration and business management, and in the context of any business reorganisation or group restructuring exercise.

If you feel that your interests and fundamental rights outweigh our business purposes, and that we should therefore stop processing your data, please let us know.

- **Where we need to comply with a legal or regulatory obligation.**

Where necessary for the services we provide to you, we will use your personal data to verify your identity and otherwise discharge our legal and regulatory obligations, and/or to assist other entities with their obligations to verify your identity or otherwise discharge their legal and regulatory obligations.

4. Disclosure of your personal data

We may share your personal data with any member of the wider Alvarium group companies (details of which can be found at <https://ljfiduciary.com>, <https://alvariumprivate.com> and <https://alvariuminvestments.com>) and with our service providers such as banks and other financial institutions, technical service providers and other sub-contractors.

We may share your information in any of the following situations:

- if we are under a duty to disclose or share your personal data in order to comply with any of our legal or regulatory obligations;

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- in order to enforce or apply our agreements, or to protect the rights, property, or safety of Alvarium, you, our other clients, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction;
- in the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets; or
- if Alvarium (or any entity within the Alvarium group) or substantially all of its assets are acquired by a third party, in which case personal data we hold about you may be one of the transferred assets.

5. Where we store personal data

The personal data that Alvarium holds about you may be transferred to, and stored in, a different jurisdiction. It may also be processed by staff operating in other countries who work for us or for one of our service providers. Such staff may be engaged in, among other things, providing you with investment services, providing you with administrative services, managing your Account(s) and the provision of support services.

If we transfer your personal data outside of the EEA to a country which the European Commission does not deem to have adequate data privacy laws, we will ensure that such transfer(s) are in accordance with applicable data privacy laws by implementing the Model Clauses pursuant to Commission decisions 2004/915/EC or 2010/87/EU (as appropriate) with the recipient(s) of your personal data; and/or ensuring that the recipient of your data is registered with the EU-US Privacy Shield.

6. Data security

We are committed to protecting your personal data, and whilst we have put in place appropriate security measures to safeguard your personal data which follow industry standards, including the ISO/IEC 27001 guidelines. Unfortunately, the transmission of information via the internet is not completely secure. We cannot guarantee the security of any data transmitted electronically, and any such transmission is at your own risk. Once we have received your personal data, we implement strict procedures and security features to minimise the risk of unauthorised access.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

7. How long we store your personal data for

Alvarium will only hold your personal data for as long as is necessary to allow Alvarium to provide you with services, or for as long as we are required to in order to comply with our legal or regulatory obligations, in either case in line with our Data Retention Policy. A copy of our Data Retention Policy is available upon request.

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8. Your rights

Data protection legislation provides you with certain rights in relation to your personal data. These rights include the right to ask us for all the personal data which we hold about you or to correct the personal data which we hold about you, if the information we hold is inaccurate or incomplete. You also have other rights which may be available in some situations, such as the right to ask us to delete the information we hold about you or to restrict or object to how we use your personal data.

You also have the right to require that we provide you with the information that we hold about you in a structured, commonly used and machine-readable format and to withdraw your consent to our using your data for marketing purposes at any time.

If you wish to exercise any of the rights above, please contact us by emailing dataprotection@alvariuminvestments.com.

9. What to do if you are unhappy about how we use your personal data

If you are unhappy about our use of your personal data or the information we hold about you, or if you are unhappy about how we have responded to any request to exercise your data protection rights, please contact your Alvarium relationship manager in the first instance. If you would like to escalate any matter, you can also contact our Data Security Officer at datasecurityofficer@alvariuminvestments.com or write to us, marking your letter for the attention of the Data Security Officer.

You also have the right to complain about our use of personal data to the authority which supervises us for data protection purposes.

The relevant authorities are:

- In the UK: The Information Commissioner's Office (<https://ico.org.uk/>)
- In Portugal: The National Commission for Data Protection (<https://www.cnpd.pt/index.asp>)

However, we would be grateful if you would contact us in the first instance, so we can endeavour to deal with your concerns direct.

10. Contact

If you have any questions about the personal data that Alvarium holds about you or about this data privacy notice, you should contact your Alvarium relationship manager. Alternatively, you can email the Alvarium Data Security Officer at datasecurityofficer@alvariuminvestments.com or write to us at our registered office given above, marking your letter for the attention of the Data Security Officer.

Last updated: 11 March 2019