

Privacy Statement

Who we are

GHC Capital Markets Limited are registered with the Information Commissioner's Office (ICO) as a "Data Controller" and we are both a data controller and data Processor of the personal data you provide to us. Our Company registration number is 3113332 and registered address is 22-30 Horsefair Street, Leicester, LE1 5BD. We are authorised and regulated by the Financial Conduct Authority (FCA) Our FCA Firm Reference Number (FRN) is 152998.

What we need

In the conduct of business with you we will need to collect information about you which we will hold as data controllers under the General Data Protection Regulation (GDPR).

We collect information you provide to us which includes, but is not limited to:

Your name, email address, address or postal code, payment method and telephone number. We collect this information in a number of ways, including when you provide it as part of signing up to our services, interact with our Customer Service or other employees, or participate in surveys or marketing promotions;

We will not collect any personal data from you that we do not need for providing and overseeing the services that we will provide to you.

Why we need the information

Before we can establish and operate an Investment Portfolio Account on your behalf we, or your Financial Adviser, are obliged by the FCA Rules to assess the appropriateness of the service by obtaining sufficient information from you to establish your financial situation, your investment objectives, and your knowledge & experience.

In order to fulfil our contract with you we have a lawful basis for processing your data, as well as a legal obligation to the Financial Conduct Authority (FCA) and HMRC.

In accordance with data protection legislation we will handle all information we obtain about you in the course of providing our services, lawfully and fairly in accordance with our position as a data controller.

In accordance with legal and regulatory requirements, we will retain your personal record data for a minimum period of five years following the termination of any relationship between us. We will not act upon any request you give us to destroy records relating to your account unless all our regulatory obligations have been discharged.

What we do with it

We will use this information to ensure that our advice is suitable for your circumstances. All the personal data we hold about you will be processed by our staff in the United Kingdom and may also be disclosed to selected third parties such as the FCA and Financial Ombudsman Service (FOS) where there is a legal requirement to do so.

Please be aware that your information may be stored on a cloud-

based system whose services are located within the European Union.

The information we collect, and use, will depend on the nature of our business relationship with you as follows:

In relation to prospective investors, we may process personal data for identification purposes (prior to becoming an investor in our services), for the purposes of anti-money laundering, counter terrorist financing, suitability and appropriateness assessments, "Know Your Client" and credit-worthiness checks, and for any other applicable legal or regulatory reasons. Failure to provide relevant information will mean that we will not be able to take on a potential investor.

In relation to investors in our services, we may process information collected for the purpose of account administration and other general business purposes (for example, for processing subscriptions and investments; carrying out investor instructions; handling any complaints and enquiries; sending investor communications, including financial reports, valuations, corporate actions). In addition, in order to comply with regulatory obligations, we may collect and disclose certain information about our investors and certain related persons and their investments to HM Revenue & Customs and/or other relevant tax authorities overseas.

We may from time to time process personal data of investors to comply with legal and regulatory requirements impacting our business. In particular, we may need in the context of our business: to obtain legal advice on legal and regulatory requirements; to report to relevant regulators; to comply with market reporting requirements in the conduct of our business.

In relation to intermediaries who introduce investors into our services (such as distributors, platforms and financial advisers), we may process personal data to conduct market research, gauge product sales or product performance or assess the creditworthiness of intermediaries. In addition, we may process the personal data of investors introduced to our services, as outlined above.

If you use a financial adviser (as indicated on your investor application form), then details of your investments and valuations may also be provided to such financial adviser.

We may disclose to relevant tax authorities, regulators, government departments or competent authorities of the UK or of other countries, any personal data (including tax status, identity or residency or other personal and payment information, documents or self-certifications) in order to comply with a court order or to meet legal and regulatory requirements arising in the conduct of our business. Such disclosure may be made directly to such regulators or competent authorities or made indirectly to our advisers or providers who will make such filings or disclosures on our behalf.

Sensitive personal data

While doing business with us you may either directly or inadvertently provide us with information about your health

conditions, religious beliefs or sexual orientation. This type of information is known under the law as “special category information” (you may also know this as “sensitive personal data”) and we require your explicit consent to process this type of information. GHC Capital Markets Limited do not require or process this information for any purpose, nor will we actively seek to receive it.

Communications

Whilst we do take reasonable steps to keep information about you secure when in our possession we cannot guarantee the security of any information you disclose on-line. You accept the inherent security implications of providing information over the Internet and will not hold us responsible for any breach of security or disclosure of your information unless we have been negligent.

Sharing information

We may disclose the information we hold on you without reference to you, to other financial services institutions seeking to verify your identity for anti-money laundering purposes.

We and other companies in our group of companies, and our agents provided they have similar obligations in respect of data processing, may hold and process by computer or otherwise any information we hold about you and may use any of that information to administer and operate your account and to provide any service to you, to monitor and analyse the conduct of your account, to assess any credit risk limit and to enable us to carry out statistical and other analysis.

To facilitate the provision of services by us we may also transfer information we hold about you to countries both inside and outside the European Economic Area, which may or may not have data protection laws for any of the purposes described in this clause.

In accordance with the Council Directive 2003/48/EC and HMRC regulation, information relating to your savings income in the form of interest earned may be reported to, received from or exchanged with tax authorities of EU member states or other countries prescribed by applicable regulation.

We may disclose to the FCA, HMRC and to any other competent regulatory authority, investment exchange or clearing house or government agency investigators, inspectors or agents appointed by them, information relating to you or, if relevant, any of your clients or any beneficiaries.

We may pass information we obtain about you to third parties:

- to enable you to gain access to restricted parts of this Website or any other website;
- to enable us to provide or for you to receive and/or pay for a Service;
- to enable you to receive information you have requested to be sent to you in order to fulfil a request you may have made.

Your responsibility

We rely upon the information you provide to us and any subsequent updates. You are responsible for telling us if this information changes.

You should not assume or infer we are aware of changes in any of the above on the basis of other communications, such as receipt of a cheque from a new bank account. Failure to keep us up to date

with any of the above may impact the quality of the services we provide to you or affect the receipt of communications between us and you or your agent.

All information you supply will be accurate and we may, as we consider necessary, make enquiries, obtain references and undertake electronic verification checks on any data you provide to us. We may supplement the information you provide to us with information we receive from third parties.

Your rights

Under the data protection legislation, you have several rights regarding the use of your personal data as follows:

- The right to be informed
- The right of access
- The right to rectification
- The right to erasure
- The right to restrict processing
- The right to data portability
- The right to object
- Rights in relation to automated decision-making and profiling

You may contact us at any point in respect of these rights.

However, you should be aware that in some cases, such as restricting processing, this may result in us being unable to fulfil our contractual obligations to you, and we will therefore no longer be able to provide a service. You should also note that certain legal obligations will also take precedent over these rights.

Financial Promotions

From time to time we may wish to contact you regarding investment products or send you our newsletters that we hope you will find of interest. We will not provide this without first receiving consent from you, and you may withdraw your consent to receiving marketing contact and the associated processing of your data at any time which you can do this via telephone or email or post. At no time are you obliged to accept recommendations given in our newsletters or promotions

Please be assured that it will not affect your relationship with GHC Capital Markets Limited or any services we provide you with if do not give your permission for us to contact you for marketing purposes.

How to complain about the use of your data

If you wish to raise a complaint about how we have handled your personal data, including in relation to any of the rights mentioned above, you can contact our Data Breach Liaison & Reporting Officer by telephone on 0116 204 5500 or by email at customerservices@ghcl.co.uk and we will investigate your concerns.

Alternatively, you may write to us at:

The Data Breach Liaison & Reporting Officer
GHC Capital Markets Limited
22-30 Horsefair Street
Leicester
LE1 5BD

If you are not satisfied with our response, or believe we are processing your data unfairly or unlawfully, you can complain to the Information Commissioner’s Office (ICO). You can find further information about the ICO and their complaints procedure at the following link <https://ico.org.uk/concerns>.