



Privacy Policy – General

The information contained in this document is effective from **06/04/2019**.

Slater Investments Limited ('Company') is a 'data controller' and gathers and uses certain information about you. In this notice, references to 'we' or 'us' means the Company.

How To Contact Us

Please contact us if you have any questions about this privacy notice or the information we hold about you.



General Enquiries: +44 (0) 207 220 9460



The Operations Department, Slater Investments Ltd.
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Who We Are

We collect, use and are responsible for certain personal information about you. When we do so we are regulated under the **General Data Protection Regulation** which applies across the European Union (including in the United Kingdom) and we are responsible as 'controller' of that personal information for the purposes of those laws.

The Personal Information We Collect and Use

Information Collected by Us

In the course of opening and operating your account with us, we collect the following personal information when you provide it to us including, for example:

- Personal identification and contact information such as your name and address, NI number, ID or passport number;
- Financial and tax information, such as bank details, tax codes; and
- In the case of a corporate entity, similar details in respect of the Directors, Partners, Trustees, Shareholders and any Authorised Persons who operate the account.

Information Collected from Other Sources

We may also obtain personal information from other sources, for example, credit rating agencies, regulatory bodies, Companies House, your advisors (where applicable).

How We Use Your Personal Information

We use your personal information in order to open an account and operate your account with us in accordance with our Terms & Conditions and internal policies and procedures.

Your personal information will also be used in order for us to comply with our legal, tax and regulatory obligations, to carry out money laundering, financial and credit checks, and for fraud prevention and detecting purposes.

Who We Share Your Personal Information With

We routinely share your personal details with our Fund Administrators, the Depository/Trustee and Custodians. This data sharing enables your account with us to be opened, administered and operated.

We will share personal information with law enforcement or other public or governmental authorities if required by applicable law.

During the course of Company audits, we may be required to share your personal information with our auditors. However, where possible, this information will be anonymised.

We will not share your personal information with any other third party unless you specifically request us to do so.

How Long Your Personal Information Will Be Kept

We will hold your personal data for no longer than reasonably necessary to fulfil the purpose for which it was collected. Once those purposes have been completed we shall hold them for no longer than any period required by law.

Updating Your Personal Information

It is important to inform us of any changes in your personal information to ensure the information held is accurate and kept up to date. If you need to do this please contact us immediately either by email, calling us or in writing.

Transfer Of Your Information Out Of The EEA

We may transfer your personal information outside the European Economic Area (EEA).

Our Fund Administrators may hold your personal information on its network in Jersey and undertake processing in South Africa in order to facilitate the administration of the Funds. South Africa, however, do not have the same data protection laws as the United Kingdom and the EEA, and we will therefore ensure that any transfer of your personal information is protected and transferred in a manner consistent with the legal requirements applicable to the information; thereby ensuring your privacy rights are safeguarded as well as providing remedies in the unlikely event of any misuse of your information.

If you would like further information about the safeguards we have in place to protect your personal information, please contact operations@slaterinvestments.com.

Your Rights

Under the [General Data Protection Regulation](#) you have a number of important rights free of charge.

In summary, those include rights to:

- fair processing of information and transparency over how we use your personal information;
- access to your personal information and to certain other supplementary information that this Privacy Notice is already designed to address;
- require us to correct any mistakes in your information which we hold;
- require the erasure of personal information concerning you in certain situations;
- receive the personal information concerning you which you have provided to us, in a structured, commonly used and machine-readable format and have the right to transmit those data to a third party in certain situations;
- object at any time to processing of personal information concerning you for direct marketing;
- object to decisions being taken by automated means which produce legal effects concerning you or similarly significantly affect you;
- object in certain other situations to our continued processing of your personal information;
- otherwise restrict our processing of your personal information in certain circumstances.

For further information on each of those rights, including the circumstances in which they apply, see the [Guidance from the UK Information Commissioner's Office \(ICO\) on individual's rights under the General Data Protection Regulation](#).

If you would like to exercise any of those rights, please:

- email, call or write to us;
- let us have enough information to identify you, for example, account number, your name, registration details;
- let us have proof of your identity and address (a copy of your driving licence or passport and a recent utility or credit card bill); and
- let us know the information to which your request relates, including any account or reference numbers, if you have them.

Where you have provided consent to us to process your data in a certain way, you also have the right to withdraw that consent. Where you have provided us with consent to send you any direct marketing information and would like to unsubscribe from any of those communications, you can also click on the 'unsubscribe' button at the bottom of the emails. Or, alternatively, email, call or write to us.

Keeping Your Personal Information Secure

We have appropriate security measures in place to prevent personal information from being accidentally lost, or used or accessed in an unauthorised way. We limit access to your personal information to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

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

How To Complain

We hope that we can resolve any query or concern you raise about our use of your information.

The **General Data Protection Regulation** also gives you right to lodge a complaint with a supervisory authority, in particular in the European Union (or European Economic Area) state where you work, normally live or where any alleged infringement of data protection laws occurred. The supervisory authority in the UK is the Information Commissioner who may be contacted at <https://ico.org.uk/concerns/> or telephone: 0303 123 1113.

Changes To This Privacy Notice

We may change this privacy notice from time to time.