

OUR PRIVACY POLICY

The term Zodiac Partners Limited or 'us' or 'we' refers to the owner of the Website whose registered office is Rye House, Kart R, Rye Road, Hoddesdon, EN11 0EH, United Kingdom. Our company registration number is 10647615 and place of registration. The term 'you' or 'your' refers to the user or viewer of our Website.

This "Privacy Policy" details how we manage the personal information provided to us by you or a third party in connection with our provision of services to you or which we collect from your use of our services and/or our website. If you have any questions about this Privacy Policy please contact our Data Privacy Representative;

Wayne Davis +44 (0)20 8396 6890

info@zodiacpartners.co.uk

If you do not agree to the following policy, you may wish to cease viewing/using this Website, and or refrain from submitting your personal data to us.

We may change this notice from time to time by updating this page. You should check this page from time to time to ensure that you are happy with any changes. This notice is effective from 25 May 2018. For the purposes of meeting the Data Protection Act 2018 territorial scope requirements, the United Kingdom is identified as the named territory where the processing of personal data takes place.

If you have any requests concerning your personal data or any queries with regard to this notice, please contact Zodiac Partners Limited, Rye House, Kart R, Rye Road, Hoddesdon, EN11 0EH, United Kingdom. We are registered with the Information Commissioner's Office ('ICO'); our registration number is ZA478869. Information on the Data Protection Act 2018 and the General Data Protection Regulation (the GDPR) is also available on the Information Commissioner's website. Under the GDPR, your individual rights in relation to your personal data are as follows;

- the right to be informed about the personal data being processed,
- the right of access to the data,
- the right to rectification,
- the right to erasure,
- the right to restrict processing,
- the right to data portability (to receive an electronic copy of your personal data),
- the right to object to processing of your personal data and
- the right not to be subject to automated decision-making. including profiling.

Personal data we collect

We collect your personal data typically when you register for our services or otherwise interact with us. Below are examples of the categories of the data we collect on you.

Technical Information

For the most part, you may visit our website without having to identify yourself. However, certain technical information is normally collected by us as a standard part of our services. This information relates to your IP address, information about your device and other technical information your browser provides us with, and data about your use of our website (such as when you use the website and how you interact with its content). If you call us, additional information such as your telephone number may be saved as a standard part of that communication.

Information you provide to us. To allow us to provide you with the services you have requested, or to communicate with you, we may ask you to provide us with certain information such as your name, date of birth or age, email address, home or postal address, or financial situation. In registering for our services, you may create usernames, passwords and other credentials that we use to authenticate you and to validate your actions. You may send us copies of your personal identity documents or details about other financial products to which you may be a party.

Our services may ask you to submit information about other people, for example, members of your family or household, or close links. You may also indirectly provide us with information through your consents, preferences and feedback.

Your transactions with us

We collect details of the queries or requests you have made, the products and services provided (including delivery details), purchasing details (including payments made, credit card details, billing address, credit checks and other such financial information), details of agreements between us, records of contacts and communications, information and details relating to the content you have provided us with and other such transactional information. We may, in accordance with applicable law, record your communication with our customer care team or with other similar contact points.

Location data

Certain services may involve the use of your location data. Use of your location data is, however, subject to your prior consent for each service.

Personal data obtained from third parties. We may obtain personal data about you from third party sources such as:

- Veriphy
- SmartSearch
- Former employers (references)
- Professional contacts (e.g. lawyer, accountant)

Use of personal data

We collect and process your data for one or more of the following grounds:

To fulfil our contract with you

We use your personal data as is necessary to provide you with our products and services in line with our overall contract. We process and use your personal data to provide you with a personalised service and the product or service you have requested, to fulfil your other requests, process your order(s), and as otherwise may be necessary to perform or enforce the contract between us.

We are required to do so by law or regulation. We are required to process and store some of your data in order to fulfil our regulatory obligations. This may include the information we need to establish your needs and requirements and to provide you with a personalised recommendation or advice. We may capture and share your personal data with organisations that can confirm your identity and provide information necessary to prevent fraud or other financial crimes. We may also be required to share your personal details where requested to by legal or regulatory authorities or the Financial Ombudsman Service.

- Please note that we keep records of your trading history including:
- Products you trade and their performance
- Products we trade on your behalf and their performance
- Historical data about the trades and investments you made including the amount invested
- Your preference for certain types of services and products.

We may record any communications, electronic, by telephone, in person or otherwise, that we have with you in relation to the services we provide to you and our relationship with you. These recordings will be our sole property and constitute evidence of the communications between us. Any telephone conversation may be recorded without the use of a warning tone or any other further notice. Please note that our offices or premises may have CCTV which will record your image.

There is a substantial public interest in doing so. There is a substantial public interest in the efficient functioning of financial services industry and its markets which requires those who advise upon, arrange, underwrite or administer an insurance contract or claim to process personal data, including 'sensitive' information about your health or criminal convictions.

You have provided us with your informed consent. Where you have given your informed consent, we will process your data in accordance with the permission you have given us and this privacy notice. You may withdraw your consent at any time by contacting us at info@zodiacpartners.co.uk.

Our other legitimate interests in using your data

Taking into account your interests, we process your personal data for the following purposes:

To verify your identity during on-boarding

We process and use your personal data to ensure the functionality and security of our products and services, to identify you and the instructions you give us, and to prevent and detect fraud and other misuses.

Development of products and services

We process and use your personal data to develop our products and/or services. However, for the most part we use only aggregated and statistical information in the development of our products and services, and not data directly identifiable to you. We may also process and use your personal data to personalise our offerings and to provide you with service more relevant to you, for example, to make recommendations and to display customised content and advertising. We may combine personal data collected in connection with your use of a particular product and/or service with other personal data we may hold about you, unless the purpose for which we collected that data is incompatible with amalgamation.

Communicating with you and marketing

We process and use your personal data to communicate with you, for example, to provide information relating to our products and/or services you are using or to contact you for customer satisfaction queries. We may process and use your personal data for marketing. Marketing purposes may include using your personal data for personalised marketing or research purposes in accordance with applicable laws, for example, to conduct market research and to communicate our products, services or promotions to you via our own or third parties' electronic or other services. When contacting you for the purpose of marketing, we will take into account any preferences you have expressed to us, including any desire not to receive marketing.

Any email marketing messages we send are in accordance with the GDPR and the Privacy and Electronic Communication Regulations (PECRs). We provide you with an easy method to withdraw your consent (unsubscribe) or manage your preferences/the information we hold about you at any time. See any marketing messages for instructions on how to unsubscribe or manage your preferences.

Profiling

We may process and use your personal data for profiling for such purposes as targeted direct marketing and improvement of our products or services. We may also create aggregated and statistical information based on your personal data. Profiling includes automated processing of your personal data for evaluating, analysing or predicting your personal preferences or

interests in order to, for example, send you marketing messages concerning products or services suitable for you.

Tracking remuneration due to us or our partners

We use your personal data to ensure that we receive the remuneration or commission due to us from, or payable by us to, any third-party product providers or distributors.

Insurance

We process personal data as required to enable us to periodically obtain insurance cover for our business and to notify and process claims with our insurers.

Business continuity

In the event of an interruption or cessation of our business, we need to ensure that we can implement our business continuity procedures (for example, we may need to rebuild our IT systems) or wind down planning to protect your interests. This may involve a transfer of your personal data to a third party (see below).

How do we secure your personal data?

We have robust procedures in place within our business:

- to protect data against accidental loss,
- to prevent unauthorised access, use, destruction or disclosure,
- to ensure business continuity and disaster recovery where required,
- to restrict access to personal information,
- to conduct privacy impact assessments in accordance with the law and our business policies,
- to train staff and contractors on data security, and
- to manage third party risks, through use of contracts and security reviews

How long do we keep personal data?

We will keep your personal data only for so long as it is reasonable for us to do so, depending upon the nature of the data and our processing, and the grounds upon which we collected it. In general, we will delete redundant account information within 14 days of our relationship ending. However, we are obliged to keep certain records of our relationship to comply with the FCA's and other regulatory rules, in which case we will instead restrict access through our archiving processes. Subject to any actual or potential legal claim or regulatory investigation, the maximum time that we envisage retaining any of your information is seven years, after which time it will be destroyed.

Information we use for marketing purposes will be kept by us until you notify us that you no longer wish to receive this information. If you do notify us that you no longer wish to receive

marketing information, we will keep an encrypted version of your contact information to ensure we respect your wishes.

Other websites

Our website may contain links to other websites which are outside of our control and are not covered by this privacy notice. If you access other websites using the links provided, the operators of these websites may collect information from you which will be used by them in accordance with their privacy notice which may be different to our own. You should exercise caution and look at the privacy notice applicable to the website in question.

Transfers of your personal data

We may transfer your personal data to the third parties noted below, or as required by law.

Material service providers

We may transfer your personal data to the following third parties who provide us with a material service:

- Veriphy
- SmartSearch

Generic service providers (data processors)

We may transfer your personal data to third parties who process personal data on our behalf to enable the efficient technical and logistical provision of our services. These service providers may, for instance, supply us with cloud data storage, data security services, customer relationship management software, and other support services. We may substitute a technical or logistical service provider from time to time. Such parties are generally not permitted to use your personal data for any other purposes than that for which your personal data was collected, and we require them to act consistently with applicable laws and this Privacy notice as well as to use appropriate security measures to protect your personal data.

Event-driven transfers

We may transfer your personal data to third parties in certain events where it is necessary to protect your, or our, legitimate interests. This includes the cessation, sale or transfer of our business, civil or criminal legal, or regulatory, proceedings or insurance claims.

International transfers

Our products and services may be provided using resources and servers located in various countries around the world. Therefore, your personal data may be transferred outside the country where you use our services, including to countries outside the European Economic Area (EEA). We will transfer data in such circumstances only if the level of data protection in

that jurisdiction is deemed adequate and if there are appropriate safeguards in place to protect your privacy.

Given that the Internet is a global environment, using the Internet to collect and process personal data necessarily involves the transmission of information on an international basis. Therefore, by browsing the Website and communicating electronically with us, you acknowledge and agree to Zodiac Partners Limited processing personal data in this way.

What are your rights?

You have the right to request information on and access to the personal data we hold about you. You also have the right to request that we correct or delete any incomplete, incorrect, unnecessary or outdated personal data we hold about you. However, we cannot delete personal data that is necessary for compliance with our binding legal or regulatory obligations or if the personal data must be retained according to applicable laws, or is required for the exercise or defence of a legal or regulatory claim.

In case you consider your personal data collected by us to be inaccurate but you do not wish your personal data to be deleted, if we have used your personal data unlawfully or you have objected to the processing and the existence of legitimate grounds for processing is still under consideration, you may request restriction of processing of your personal data.

You may also at any time object to your personal data being processed for direct marketing purposes, sending promotional materials, profiling, or for the performance of market research. Where your personal data is processed based on your consent, you have the right to withdraw your consent for such processing at any time.

In case you wish to make use of your rights mentioned above, you may, as appropriate and in accordance with applicable laws, exercise such rights by contacting us through the contact points referred in the marketing materials or below in this notice. In some cases, especially if you wish us to delete or cease the processing of your personal data, this may also mean that we may not be able to continue to provide the services to you.

Please note that we may need to identify you and to ask for additional information in order to be able to fulfil your requests. Please also note that applicable law may contain restrictions and other provisions that relate to your above rights.

Subject access rights

You have a right to a copy of and details of the personal data held about you. To obtain a copy of the personal data Zodiac Partners Limited holds about you, please write to us at Zodiac Partners Limited, Rye House, Kart R, Rye Road, Hoddesdon, EN11 0EH. No charge will normally be made by Zodiac Partners Limited, for providing this information. If your request is considered to be repetitive, wholly unfounded and/or excessive, we are entitled to charge a reasonable administration fee.

Use of cookies

A cookie is a small piece of code, sent from a website to a user's internet browser, which allows that website to track the user's previous activity when they return to that website. This allows us to provide you with the experience that you expect from us and lets us continually improve our service.

You can block cookies by changing the settings on your browser, but if you do you will not be able to access all or parts of our website.

The types of cookies we may use are:

Strictly necessary cookies

These are cookies that are required for the operation of our website. They include, for example, cookies that enable you to log into secure areas of our website. or make use of e-billing services.

Analytical/performance cookies

These allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily.

Functionality cookies

These are used to recognise you when you return to our website. This enables us to personalise our content for you, greet you by name and remember your preferences (for example, your choice of language or region).

Targeting cookies

These cookies record your visit to our website, the pages you have visited and the links you have followed. We will use this information to make our website and the advertising displayed on it more relevant to your interests. We may also share this information with third parties for this purpose.

We do not have any control over the use of cookies by third parties, including our partners and affiliates. To manage cookies from third party websites, you will need to visit their site to adjust your settings.

For queries please contact;

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(This Policy was updated on 4th September 2020)