



B O W M O R E
A S S E T M A N A G E M E N T

PRIVACY NOTICE

The General Data Protection Regulation ('GDPR') governs the processing, such as the use or holding, of personal data, which is essentially any information about identifiable living individuals, and also gives those individuals certain rights and remedies in respect of that information. This privacy policy will lay out the essentials such as the what, where, when and how in relation to the personal information collected from you. This should help you feel more confident about the privacy and the security of your personal information.

Identity and contact details of the Data Controller

Bowmore Asset Management Limited (Company Number 09051799 and FCA Reference 626431) whose registered office is at Farleigh House, Farleigh Court, Old Weston Road, Flax Bourton, Bristol BS48 1UR is the Data Controller and is committed to protecting the rights of individuals in line with the GDPR.

Contact details concerning Data Protection

Bowmore is not required to appoint a Data Protection Officer however if you have any questions relating to data protection, please get in touch using the contact details below.

What information do we collect about you?

We collect information about you when you engage us for Discretionary Portfolio Management services. It may consist of any of the following:

- Your contact details, such as your name, address, telephone number and email address;
- Your date of birth, nationality, country of birth, country of residence, employment status and tax identification number (i.e., National Insurance Number);
- Passport details, driving licence and utility bills;
- Details of the services you request from us;
- Any records held by financial crime prevention agencies, on the Electoral Register and by providers of utility services; and
- Details of your employment status, income, health and source of wealth.

Before we can begin providing you with our services, we need to obtain certain information about you, so that we can verify your identity. This is so that we can meet our obligations under the Money Laundering, Terrorist Financing and Transfer of Funds Regulations 2017 along with any other applicable legislation and for the purpose of crime prevention and fraud prevention. **We are obliged to collect this information and without it we will be unable to provide you with our services.**

We may also collect information when you voluntarily complete client surveys or provide feedback to us. Information relating to usage of our website is collected using cookies. These are text files placed on your computer to collect standard internet log information and visitor behaviour information. We may use this information collected from the website to improve our website over time.

Why do we need to collect and use your personal data?

The primary legal basis that we intend to use for the processing of your data is for the performance of our contract with you. The information that we collect about you is essential for us to be able to carry out the services that you require from us effectively. Without collecting your personal data we'd also be unable to fulfil our legal and regulatory obligations.

Where special category data is required, we'll obtain your explicit consent in order to collect and process this information.

How will we use the information about you?

We collect information about you in order to provide you with the services for which you engage us.



We use information held about you in the following ways:

- To process your application to use our services;
- To undertake checks such as identification verification with fraud prevention agencies to enable us to comply with our anti-money laundering obligations and for the purposes of crime prevention and fraud prevention;
- To comply with our obligations arising from any contracts entered into between you and us and to provide you with the information, products and services that you request from us;
- To help protect your information and prevent unauthorised access to it;
- To deal with any queries, complaints or problems reported by you;
- To generate statistics relating to use of our website, such as the popularity of certain features or services. We do not use personally identifiable information for these purposes;
- To provide you with information about other services we offer that are similar to those that you have already engaged us to provide or enquired about. In such instances Bowmore will only do so where we have received explicit consent from you and for each separate method of communication. **You may opt out of receiving this information at any time by contacting us using the contact details below;**
- If required to do so by law and to the extent necessary for the proper operation of our systems, to protect us/our customers, or for the enforcement of any agreement between you and us;
- To notify you of changes to our services; and
- To help improve the services we provide to you.

Unless otherwise stated in this Privacy Notice, the legal basis for our use of your personal data will be for legal or contractual reasons.

Who might we share your information with?

If you agree, we may email you about other products or services that we think may be of interest to you.

We won't share your information for marketing purposes with other companies.

In order to deliver our services to you effectively we may send your details to third parties such as:

- Businesses that are legally part of the same group of companies within Bowmore, or that become part of that group;
- Our IT providers, services providers and agents in order to provide and maintain the provision of the services;
- Our appointed auditors, accountants, lawyers and other professional advisers (e.g., compliance consultants), to the extent that they require access to the information in order to advise us;
- Fraud prevention agencies and other organisations to allow us to undertake the checks set out below. We will supply details of such agencies on request;
- Providers of investments or services we recommend, including investment platforms, discretionary management services, or other such products or services. We may also be required to share information with auditors appointed by the providers of such products or services;
- The regulators, the Financial Conduct Authority, or any relevant regulatory authority where they are entitled to require disclosure;
- Relevant Body to meet applicable law, the order of a Court or market rules and codes of practice applicable to the circumstances at the time;
- Relevant body to investigate or prevent fraud or activities believed to be illegal or otherwise in breach of applicable law;



- Relevant tax, payments and customs authorities who may pass this on to tax authorities in other jurisdictions. Tax regulations require us to collect information about each investor's tax residency;
- A prospective seller or buyer of Bowmore Asset Management or its assets (in the event that we sell or buy any business or assets), in which case we may disclose your personal information. If all of Bowmore's assets are acquired by a third party, personal information held by it about its clients may be one of the transferred assets.

Where third parties are involved in processing your data, we'll have a contract in place with them to ensure that the nature and purpose of the processing is clear, that they are subject to a duty of confidence in processing your data and that they'll only act in accordance with our written instructions.

Where it's necessary for your personal data to be forwarded to you or a third party we'll use password protection as a security measure to protect your personal data in transit.

How long do we keep hold of your information?

In principle, your personal data shouldn't be held for longer than is required under the terms of our contract for services with you. However, we're subject to regulatory requirements to retain data for specified minimum periods. We also reserve the right to retain data for longer than this due to the possibility that it may be required to defend a future claim against us.

We shall keep recordings of the following for 5 years:

- Call recordings, electronic communications and minutes of face-to-face meetings;
- Periodic statements (for example, valuations); and
- All orders and transactions in financial instruments on your behalf (including information about your identity).

Bowmore retain copies of all records aforementioned for a maximum of 7 years unless regulatory requirements say otherwise.

You have the right to request deletion of your personal data. We'll comply with this request, subject to the restrictions of our regulatory obligations and legitimate interests as noted above.

Where we rely on your consent to use your personal data, you have the right to withdraw that consent at any time.

How can I access the information you hold about me?

You have the following rights (unless exemptions apply), which can be exercised by contacting us using the details provided below. These include the right -

- To ask us not to process your personal data for marketing purposes;
- To access personal data held about you and to obtain a copy of it;
- To prevent any processing of personal data that is causing or is likely to cause unwarranted and substantial damage or distress to you or another individual;
- To request the rectification or completion of personal data which are inaccurate or incomplete;
- To restrict or object to the processing of your personal data (from 25th May 2018 onwards);
- To request its erasure under certain circumstances;
- In certain circumstances, to receive your personal data, which you have provided to us, in a structured, commonly-used and machine-readable format and the right to transmit that data to another data controller without hindrance, or to have that personal data transmitted to another data controller, where technically feasible (from 25th May 2018 onwards);



- To be informed about any use of your personal data to make automated decisions about you, and to obtain meaningful information about the logic involved, as well as the significance and the envisaged consequences of this processing; and
- To lodge a complaint about the way in which your personal data is being used to your Data Protection Authority: The Information Commissioner's Office (United Kingdom).

If you'd like a copy of some or all of your personal information, please email or write to us using the contact details noted below.

When you contact us to exercise any of the rights above, we may ask you to provide some additional information in order to verify your identity, such as your name, your address and proof of identity.

We have an obligation to ensure that your personal information is accurate and up to date. Please ask us to correct or remove any information that you think is incorrect.

Marketing

In the future we may like to send you information about our products and services which may be of interest to you. If you agree to receive marketing information, you may opt out at a later date.

You have a right at any time to stop us from contacting you for marketing purposes.

Cookies

Cookies are files which our server uses to identify your computer. Cookies cannot identify which person is using the computer. No personal details are collected, and we don't personalise the website for repeat visits.

Cookies can only be placed on a computer where the user has given their express consent. Most web browsers automatically accept cookies, but you can set your browser not to accept cookies and the below website tells you how to remove cookies from your browser. However, in a few cases some of our website features may not function as a result.

For further information visit <http://www.allaboutcookies.org/>

Other websites

Our website contains a link to our Client log in page. You are responsible for maintaining the confidentiality of your User ID and password which relate to your access to any login portals this website is linked to or any account you set up with us. You agree to accept responsibility for all activities which occur in relation to the same. This privacy policy only applies to this website so when you link to other websites using our website, you should read their own privacy policies. Equally, if you believe your User ID or password may have been compromised when accessing such login portals, please follow the contact procedures such privacy policies may provide.

You should not permit other people to use your User ID or password. We will not be responsible to you if there is unauthorised access to your login details or unauthorised activity on this website as a result of someone else using your login details unless we caused this to happen because of our negligence.

What can you do if you are unhappy with how your personal data is processed?

If you have any concerns, do please contact us to discuss these either by phone, email or by post:

0203 617 9206

enquiries@bowmoream.com

One Heddon Street, Mayfair, London W1B 4BD.

You also have a right to lodge a complaint with the supervisory authority for data protection. In the UK this is:

0303 123 1113 (local rate)



Changes to our privacy policy

We keep our privacy policy under regular review, and we'll place any updates on our website. This privacy policy was last updated on 11th May 2021.

