



PRIVACY NOTICE

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1. Privacy Notice

This notice sets out how Margetts Fund Management Ltd (Margetts) uses and protects your personal information.

Margetts is the Data Controller for personal data about our clients, suppliers, employees and shareholders. We aim to hold a minimum amount of personal data in order to provide our services and we are committed to securely storing, transferring and removing your data.

We do not trade personal data for commercial purposes and will only disclose it if required by law or if we think it would be beneficial to deliver our services. Where possible Margetts use providers based in the European Economic Area (EEA) to process your data and if this is not possible, we will make it clear.

Transfers between Margetts and third parties are securely managed under our Information Security Policy. We will always aim to transfer the minimum amount of data necessary.

If you have any data protection queries then please contact us at DataProtection@Margetts.com 0121 236 2380 or write to us Margetts Fund Management, 1 Sovereign Court, Graham Street, Birmingham B1 3JR.

2. Your rights

As an individual whose personal data is processed by Margetts you have the following rights:-

- The right to be informed. This notice and any separate processing notices provide that information.
- The right of access. You have the right to access the personal data and supplementary information that we hold on you. You also have the right to verify the legality of the processing. To exercise this right then please contact DataProtection@margetts.com.
- The right to rectification. You have the right to ask us to rectify any inaccurate or incomplete information that we hold on you. We have one calendar month to respond to your request.
- The right to erasure. You have the right to ask us to remove personal information (known as 'the right to be forgotten'). We have one calendar month to respond to your request.
- The right to restrict processing. You have the right to ask us to stop processing your data. Whilst your data may still be stored, it cannot be used. We have one calendar month to respond to your request.
- The right of data portability. You have the right to ask for your personal data to be provided in an electronic format that can be readily used by you or other organisations. We have one calendar month to respond to you request.
- The right to object. You have the right to object to your personal data being used for marketing, research or on the basis of legitimate interests.
- Rights related to automated decision making, including profiling. You have the right to ask that any decisions that are made automatically be reviewed through human assessment. Margetts may use systems to verify your identity or to verify other information, should these not pass then we automatically review information through human assessment.

To exercise any of these rights or to discuss any aspect of our data processing activities, please contact us at our offices, call 0121 236 2380 or email DataProtection@Margetts.com. We may need to verify your identity to ensure your information is correctly protected.

If you are not happy with the way we have handled your data and are unable to resolve the issue with us personally, you can complain to the [ICO](#).

Read more about the data we process and store:

3. Investors

As an investor in Margetts funds or services we will hold personal data about you in order to provide you with investment services.

Most of this data will have been collected from the application form that you completed at the start of our relationship or any communication with us. Additionally, some data may be obtained from you as we provide our services.

If you have a financial adviser or another intermediary then we will hold relevant information that has been provided by that intermediary.

In addition, we will hold information received from services designed to detect, reduce or prevent fraud and money laundering.

The legal basis for processing your personal data is to fulfil our contract, to meet our legal obligations and for legitimate interest in providing the best possible products and services.

We transfer your information to other organisations in order to provide our services or where required by law. The following third parties are currently engaged, however the list may not be comprehensive.

Unless specified, any service we employ will be a data processor and cannot use the information transferred to them.

- Bravura Services. Bravura services provide Margetts with a hosted service to manage and store the register of investors.
- External Auditors maybe appointed and information may be disclosed to them in the provision of this service.
- Electronic Anti-Money Laundering or Fraud Services. Margetts uses a number of services to prevent money laundering and fraud. We may provide your personal data to third party services that help to detect, reduce or prevent fraud and money laundering. In some cases, these providers may be classed as data controllers or joint controllers of your information. This means that they can use your data in their own right. We carefully select partners and will only select partners that we believe will not infringe on your rights and will treat your data appropriately.
- Printing Services. We may employ companies to print documents, which may be sent to you, such as contract notes or statements. Any service we use will act as a data processor and

cannot use the information transferred to them. The details of these suppliers are available on request but may change without notice.

If you have appointed a financial adviser or other intermediary then we will share your information with them and provide additional information about your investments if requested. As your appointed Financial Adviser or Intermediary they are also data controllers of your data and will act under their own Privacy Notice.

If your appointed financial adviser or intermediary asks that we provide information about your investments to third parties then we will disclose your data to those third parties as if they were the intermediary in line with those instructions.

We are required to hold information about your investments for a minimum of seven years after the relationship ends. The end of the relationship is defined as the last transaction that leaves a zero balance in your account(s).

Additionally, if we receive any correspondence from you following the end of the relationship, as defined above, this data may be held for a minimum of one year.

4. Intermediaries

Registered Users

If you have acted as an intermediary for an investor then we will hold personal data on you in order to deliver our services.

The personal information we hold will have been directly gathered through:-

- Direct communication with you or your office
- Investors that have appointed you to their account
- The FCA website
- Marketing efforts
- Other direct sources

We may also have gathered supplementary information through:-

- Credit agencies
- Anti-fraud or anti-money laundering services
- The internet
- Other supplementary sources

The legal basis for processing your personal data is to negotiate or fulfil our contract and legal obligations and for legitimate interest in providing the best possible products and services.

We may transfer your information in order to provide our services or where required by law. The following third parties are currently engaged, however the list may not be comprehensive.

Unless specified, any service we employ will be a data processor and cannot use the information transferred to them.

- Bravura Services. Bravura services provide Margetts with software to manage and store the register of investors.

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- **Electronic Anti-Money Laundering or Fraud Services.** We may provide your personal data to third party services that help to detect, reduce or prevent fraud and money laundering. In some cases these providers may be classed as data controllers or joint controllers of your information. This means that they can use your data in their own right. We carefully select partners and will only select partners that we believe will not infringe on your rights and will treat your data appropriately.
- **Printing Services.** We may employ companies to print documents, which may be sent to you, such as contract notes or statements. Any service we use will act as a data processor and cannot use the information transferred to them. The details of these suppliers are available on request, but may change without notice.

We will retain our records for a minimum of seven years after the end of the relationship with your last investor. The end of the relationship would be after the last transaction that leaves a zero balance in the account.

Additionally, if we receive any correspondence from you following the end of the relationship, as defined above, this data may be held for a minimum of one year.

General Users

If you do not currently act for investors that use Margetts services then we may hold your personal data for marketing purposes.

The information is most likely to have been gathered through a meeting with a sales representative or as a referral from a third party.

The legal basis for processing your personal data is our legitimate interest in delivering our investment services through a diverse range of intermediaries.

We may transfer your data to services which help us to deliver our message to potential customers. These providers will act as a data processor and will not use your personal data.

If you do not have any investors with Margetts then we will retain your information for a minimum of three years after the last correspondence with you. If you do not wish to hear from us then you will always be given the option to opt out and we will stop processing your information. We may need to hold some information in order to ensure that we do not send any further unsolicited communication.

5. Web users

Registered Users

If you are an investor or an intermediary that uses Margetts services and have registered on the website then you will have entered some personal data for us to link you to your account. This information is used for verification and will already be stored on our systems.

Once you successfully register for our web services, personal data, including transaction histories and investment details, will be stored on our dedicated web server.

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The legal basis for processing your personal data is to fulfil our contract and for legitimate interest in providing the best possible products and services.

This information will be stored for as long as you are registered on this service and remain an investor or intermediary. For timescales about how long information is stored at the end of our relationship please see the above relevant sections.

Your email and a small amount of data may be stored on the server.

Contact Form Users

If you get in touch with us via the contact form on the website, we may save the details you share with us. This way, if you get in touch in future we can refer to our previous conversations.

The legal basis for processing your personal data are contractual and our legitimate interest in providing several avenues for contact and being able to offer coherent communication.

This information will be held for a minimum of three years if you do not become an investor in the Margetts funds, or an intermediary with investors in the Margetts funds. If you use our services then for timescales about how long information is stored at the end of our relationship please see the above relevant sections.

General Users

We use Google Analytics (GA) to track site user interaction. We have GA code installed on our site which creates one or more text files on your computer (called a “cookie”). The cookies contain an ID number which is used to uniquely identify your browser and track each site you visit that has GA enabled.

We use this data to determine the number of people using our site and to better understand how they find and use our web pages. With this information we can continually improve the information that we provide on our site.

The legal basis for processing your personal data is our legitimate interest in delivering our investment services with the right amount of information, targeted in the right way to inform existing investors and attract new investors.

Google analytics stores the following data:

- Time of visit, pages visited, and time spent on each page of the webpages
- Interactions with site-specific widgets
- Referring site details (such as the URL a user came through to arrive at this site)
- Type of web browser
- Type of operating system (OS)
- Flash version, JavaScript support, screen resolution, and screen colour processing ability
- Network location and IP address
- Document downloads
- Clicks on links leading to external websites

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- Errors when users fill out forms
- Clicks on videos
- Scroll depth

Google also collects information about you from its DoubleClick tracking and profiling service, from ad-supported apps on your Android or iOS device, from your YouTube and Gmail activity and from your Google account. This data is put together and used to make inferences about your age, gender, interests, hobbies, shopping habits and living circumstances.

Your rights

If you already have GA cookies, they will be updated with the latest information about your visit to the site.

As we cannot access any personal data about you ourselves, we are not the Data Controller for your Google Analytics or DoubleClick profile data. You would need to contact Google directly for this information.

You have the right to object to this tracking and to stop it happening and there are methods to prevent this information being collected. An internet search should help you to implement your choice.

If you would like more detail about how we use this data then please contact us.

6. Employees and Job Applicants

If you apply to work at Margetts, we will only use the information you give us to process your application. We may need to disclose your information to someone outside Margetts, if we need a reference, or for background or credit checks. You can ask us for more information about our processes.

In addition, if you have been referred by a recruitment consultant or other intermediary then we will disclose information about you to them. You will have appointed the recruitment consultant and they will act as a data controller and will have provided you with their own Privacy Notice.

If you are unsuccessful in your job application, we will hold your personal information for a minimum 6 months after we've finished recruiting the post you applied for. After this date we will remove your information. We keep de-personalised statistical information about applicants to develop our recruitment processes, but this does not contain any information that could be used to identify individual job applicants.

If you begin employment with us, we will put together a file about your employment which may include information related to credit checks, criminal records or health issues such as allergies. In regard to health-related data this will not be shared with first aiders or fire marshals without the employees written consent

We keep the information in this file secure and will only use it for matters that apply directly to your employment.

The legal basis for processing your personal data is to negotiate and fulfil our contract and legal obligations.

Once you stop working for us, we will keep this file for 6 years according to our Record Retention and Destruction Standard.

7. Shareholders

As a shareholder of Margetts, we will record your personal data in the share register of the company, in order to; record your interest in the business, to communicate with you and, to make dividend payments.

The legal basis for processing your personal data is to fulfil our legal obligations.

8. Suppliers

If you are an employee of supplier or potential supplier to Margetts then we may hold personal data in order to correspond, such as your name and email address.

If you provide personal data on invoices or correspondence that is required for accounting purposes then this information will be stored for audit purposes.

The time we retain this information may vary depending on when it is provided and for what purpose. Some records may be held indefinitely, although you retain the same rights as above and can ask us to remove the information.

The legal basis for processing your personal data is to fulfil our contract with your employer.