



Slater Investments Limited

Investor Privacy Policy July 2024

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	1.0	Feb 2022		
Policy updated	1.1		July 2023	C&R Committee
Policy review and update	1.2		July 2024	C&R Committee

Slater Investments Limited

Investor Privacy Policy

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.

Who we are

We take your privacy very seriously and protecting your personal information is extremely important to us. Please read this privacy policy carefully as it contains important information on who we are and how and why we collect, store, use and share your personal data. It also explains your rights in relation to your personal data and how to contact us or supervisory authorities in the event you have a complaint.

We collect, use and are responsible for certain personal data about you. When we do so we are subject to the UK General Data Protection Regulation (UK GDPR).

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 numbers, ID, driving licence 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, agencies we engage to undertake AML, PEP and Sanctions checks, Companies House, your advisors (where applicable). We may collect information from you electronically through our website. We use cookies and similar technologies to support the functioning of our websites and applications. Please see our separate Website Privacy and Cookie Policy for further information.

How and why we use your personal information

We can only use your personal data if we have a proper reason. e.g.

- where you have given consent.
- to comply with our legal and regulatory obligations.
- for the performance of a contract with you or to take steps at your request before entering into a contract; or
- for our legitimate interests or those of a third party.

We use your personal information in order to open an account and operate your account with us, in accordance with our agreement with you, our terms and 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 detection purposes.

To use your personal data for any other purpose we will rely on a condition known as 'legitimate interests'. It is in our legitimate interest to collect your personal data as it provides us with information

that we need to provide our services to you more effectively as long as this does not override your own rights and interests. We will carry out an assessment when relying on legitimate interests to balance our interests against your own.

Marketing

We will use your personal data to send you marketing information about our products and services where you have provided your consent for us to do so. You have the right to opt out of receiving marketing information at any time by:

- contacting us at operations@slaterinvestments.com ; or
- using the 'unsubscribe' link in emails.

We may ask you to confirm or update your marketing preferences if you ask us to provide further products and services in the future, or if there are changes in the law, regulation, or the structure of our business.

We will always treat your personal data with the utmost respect and never sell or share it with other organisations for marketing purposes.

Who we share your personal information with

We routinely share your personal details with our Fund Administrators, the Depositary/Trustee, your appointed Independent Financial Adviser/Adviser (where applicable) and Custodians. This data sharing enables your account with us to be opened, administered and operated.

We may share your personal details with our appointed service providers who undertake Anti-Money Laundering, PEP and Sanctions checks on our behalf.

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 require all third-party service providers to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

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 the personal data for no longer than any period required by law.

Where your personal data is held

Personal data may be held at our offices and those of our service providers, representatives and agents as described above (see above: '***Who we share your personal data with***').

Some of these third parties may be based outside the UK. For more information, including on how we safeguard your personal data when this happens as described below (see below: '***Transferring your personal data out of the UK and EEA***').

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 UK and the EEA

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

Under data protection law, we can only transfer your personal data to a country or international organisation outside the UK/EEA where:

- the UK government or, where the EU GDPR applies, the European Commission has decided the particular country or international organisations ensures an adequate level of protection of personal data (known as an ‘adequacy decision’).
- there are appropriate safeguards in place, together with enforceable rights and effective legal remedies for data subjects; or
- a specific exception applies under data protection law.

Our Fund Administrators may hold your personal information on its network in Guernsey, Jersey and undertake processing in South Africa in order to facilitate the administration of the Funds. Whilst Guernsey and Jersey are not within the EEA, they are considered by the European Commission to provide an adequate level of protection.

South Africa, however, does 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.

Where we transfer your personal data outside the UK, we do so on the basis of an adequacy regulation or (where this is not available) legally approved standard data protection clauses. In the event that we cannot or choose not to continue to rely on either of those mechanisms at any time we will not transfer your personal data outside the UK unless we can do so on the basis of an alternative mechanism or exception provided by the UK data protection law and reflected in an update to this policy.

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

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, please contact us (see '**How to contact us**' below) or see the Guidance from the UK Information Commissioner's Office (ICO) on individuals' rights.

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.

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.

Contacts and complaints

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

If you have any questions about this Privacy Policy or wish to exercise any of your rights including your marketing preferences, please contact us (see below '**How to contact us**'). We hope we will be able to resolve any issues you may have.

You also have the right to lodge a complaint with the Information Commissioner. The Information Commissioner may be contacted at <https://ico.org.uk/make-a-complaint> or telephone: 0303 123 1113.

Changes to this privacy notice

We will update this policy from time to time. You should regularly return to this page so you can review any changes we make. The effective date of this policy will always be shown on the first page.

How to contact us

If you wish to contact us, please send an email to operations@slaterinvestments.com, write to: The Operations Department, Slater Investments Limited, Nicholas House, 3 Laurence Pountney Hill, London. EC4R 0EU or call 020 7220 9460.

Do you need extra help?

If you would like this policy in a more accessible format (for example audio, large print, braille) please contact us (see above '**How to contact us**'). Please tell us what format you need.