

# Privacy Notice

“Paradigm”, “we”, “us” and “our” means Paradigm Investment Partners Limited.

We are a London based investment management and corporate advisory firm incorporated in the UK, regulated by the Financial Conduct Authority and registered as a data controller with the Information Commissioners Office.

For the purposes of data protection law, we are a controller in respect of your personal data. Paradigm is committed to protecting your privacy and ensuring you are fully aware of the information we may hold on you and how that information might be used in the course of providing Services to you.

This Privacy Notice applies to you if you are:

- (a) an individual client of Saranac; or
- (b) an individual representative of a client of Saranac.

This policy (together with our Terms of Business) explains how we collect, and safeguard your personal data.

Please take the time to read and understand this Privacy Notice.

## Personal data we collect or generate about you

### (a) Information that you provide to us

We collect personal data as part of our due diligence process on both existing and prospective clients. The process includes the collection of physical forms of identity and address verification such as copies of passports, driving license or other legal documents from you.

You may provide additional information by corresponding with us via phone, email, or other means including interactions with our website or our dedicated client portal where we have granted you access.

The information you provide may include your (or your client’s) name, address, email address, phone number, financial information, holdings, transactions and data on real assets or other relevant personal details you choose to share with us. We will avoid requesting or holding special categories of personal data (racial or ethnic origin; political opinions; religious beliefs; trade union membership; physical or mental health or condition; sexual life) or personal data relating to criminal convictions or offences except where necessary to comply with our regulatory obligations.

By sharing these details with us, you confirm that you are entitled to share personal data, and where you are acting in a third party capacity that you have received the necessary authorisations to share information on behalf of the underlying client.

### (b) Information we collect or generate about you

We may monitor or record phone calls, video calls, emails and chat applications in case we need to check we have carried out your instructions correctly, to resolve queries or issues, for regulatory purposes, to help improve our quality of service, and to help detect or prevent fraud or other crimes. Conversations may also be monitored or reviewed for staff training purposes.

### (c) Information we gather from other sources

In the process of gathering information on you as a prospective client or providing services to you we will engage with a range of third party providers such as credit and fraud prevention agencies in order to gather relevant data about you and your circumstances as well as gathering intelligence from publicly available sources. These agencies may also give us additional details and information from the Electoral Register in order to aid identify verification.

If you have authorised a third party to contact us, or authorised us to contact a third party on your behalf you acknowledge we may receive and store additional information they provide to us. When dealing with any third party in relation to your details we will always undertake a thorough security check prior to any discussion.

### Retention period

How long we hold your personal data for will vary. The retention period will be determined by various criteria including:

- the purpose for which we are using it – we will need to keep the data for as long as is necessary for that purpose; and
- legal obligations – laws or regulation may set a minimum period for which we have to keep your personal data.

### How we use your information

We will continually review and assess the quality and quantity of personal data we hold, and observe your rights under applicable privacy and data protection laws. Where we provide investment services you agree and acknowledge personal data will be shared with your underlying custodian on an ongoing basis.

Information you give us may be used in the following ways:

1. to provide you with information (by various means including but not limited to post, email and phone), products and services that you have requested from us or which we may reasonably believe would be of interest to you;
2. to carry out our obligations as a result of any contracts entered into between you and us, and any investments entered into through us;
3. to comply with our legal and regulatory obligations;
4. for research and development of products and services;
5. to ensure that content of our website or client portal is presented in the most efficient manner for you and your computer;
6. to notify you about changes to our website or policies and;
7. to allow you to participate in any interactive site features, which we may make available, should you choose to do so.

You may be able to exercise your right to prevent such processing by checking certain boxes on the forms we use to collect your data. You may also be able to exercise this right at any time by contacting us.

We may also use your personal data to provide you with information about services of carefully selected associates or affiliates of Paradigm where you agree for us to share certain information with those parties. Where this occurs, those parties are also required to protect your personal data.

We are entitled to use your personal data in these ways because:

- we need to process your personal data in order to enter into a contract with you;
- we have legal and regulatory obligations that we have to discharge;
- we may need to in order to establish, exercise or defend our legal rights or for the purpose of legal proceedings; or
- the use of your personal data as described is necessary for our legitimate business interests (or the legitimate interests of one or more of our affiliates), such as:
  - maintaining our client records;
  - communicating with our clients in relation to funds

#### When we disclose your personal data

We may disclose your personal data to our affiliates in the circumstances detailed below:

- to ensure the delivery of products or services to our clients;
- for internal research and statistical analysis purposes

We will take steps to ensure that the personal data is accessed only by employees of such affiliates that have a need to do so for the purposes described in this notice.

We may also share your personal data outside of Paradigm and our affiliates:

- to perform our obligations under our agreement with you, including by sharing your personal data with our third party vendors.
- to third party agents or contractors (for example, the providers of our electronic data storage services) for the purposes of providing services to us. These third parties will be subject to confidentiality requirements and they will only use your personal data as described in this privacy notice.
- if we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our Terms and Conditions and other agreements or to protect the rights, property, or safety of Paradigm, our clients, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction, or with law enforcement or regulatory agencies and in order to comply with any legal obligation, establish, exercise or defend our legal rights.
- in the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets.
- if Paradigm or substantially all of its assets are acquired by a third party, as the personal data we hold about our customers will be one of the transferred assets.
- with our auditors, advisors and our regulator, the Financial Conduct Authority (FCA) in the course of their normal duties.

#### Transfers of your personal data outside the European Economic Area and/or the UK

We may disclose your personal data to third parties, located anywhere in the EEA (European Economic Area) and/or UK. Your personal data may be disclosed to our service providers outside the EEA/UK or be processed by staff operating outside of the EEA who work for our affiliates or for one of our suppliers.

Where we transfer your personal data outside the EEA/UK, we will ensure that it is protected in a manner that is consistent with how your personal data will be protected by us in the EEA/UK. This can be done in a number of ways, for instance:

- the country that we send the data to might be approved by the European Commission or UK Government (as applicable); or
- the recipient might have signed up to a contract based on “model contractual clauses” approved by the European Commission or UK Government (as applicable), obliging them to protect your personal data.

In other circumstances the law may permit us to otherwise transfer your personal data outside the EEA and/or UK. In all cases, however, we will ensure that any transfer of your personal data is compliant with data protection law.

You can obtain more details of the protection given to your personal data when it is transferred outside the EEA/UK (including a copy of the standard data protection clauses which we have entered into with recipients of your personal data) by contacting us in accordance with the “Contact details” section below.

### Cookies

Our websites use cookies to distinguish you from other users of our web site. This allows us to improve our site and provide an enhanced experience for our clients.

### Your rights

You have a number of legal rights in relation to the personal data that we hold about you.

These rights include:

(a) Right of access

You have the right to obtain information regarding the processing of your personal data and access to the personal data which we hold about you.

(b) Right to rectification

If you believe the data we hold is inaccurate or incomplete you are entitled to have this rectified.

(c) Right to erasure

You have the right to request that we erase your personal data in certain circumstances. Please note that there may be circumstances where you ask us to erase your personal data but we are legally entitled to retain it.

(d) Restriction on and objection to processing

You have the right to object to, and the right to request that we restrict, our processing of your personal data in certain circumstances. Again, there may be circumstances where you object to, or ask us to restrict, our processing of your personal data but we are legally entitled to continue processing your personal data and / or to refuse that request.

(e) Right to data portability

In some circumstances, you have the right to receive some personal data in a structured, commonly used and machine-readable format and/or request that we transmit those data to a third party where this is technically feasible. Please note that this right only applies to personal data which you have provided to us.

(f) Complaints

If you believe that we have processed your data in a way that does not comply with the GDPR you have the right to complain directly to the Information Commissioners Office (ICO). See the ICO's website at

[www.ico.org.uk/concerns](http://www.ico.org.uk/concerns) or telephone on 0303 123 1113. Alternatively, you can contact the Data Protection Officer using the details set out in 'Contacts' below.

Our site may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates ('Third Party Sites'). If you follow a link to any of these Third Party Sites, please note that these Third Party Sites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these Third Party Sites.

#### Changes to the notice

Any future changes to our Privacy Notice or to other policies found on this site will be posted to the relevant pages, and where appropriate, notified to you by email. We know that you are concerned with how your personal data is dealt with. This Privacy Notice sets out our current policies and demonstrates our commitment to your financial privacy. We may change the content or services found on our Site at any time without notice, and consequently our Privacy Notice may change at any time in the future.

#### Contact details

Questions, comments and requests regarding this Privacy Notice are welcomed and should be addressed via email to the Data Protection Officer at [info@paradigmip.net](mailto:info@paradigmip.net) or phone 0203 998 8075.