

DATA PROTECTION PRIVACY POLICY

Church House Investments Limited (“Church House”), are authorised and regulated by the Financial Conduct Authority (“FCA”) to provide investment management services. We take the privacy and security of personal data of all of our clients very seriously. This policy explains the information that Church House collects about you and how we use that data.

What data is captured?

In providing investment services to our clients, we are legally obliged to obtain relevant information about each client to be able to provide suitable investment solutions. Such information will include **personal data**, such as:

- **Identity details** (such as name, age, date of birth, gender and national insurance number);
- **Contact details** (such as telephone number, email address, postal address, etc.);
- **Employment details** (such as position, length of employment, salary, etc.);
- **Family details** (such as direct relations and extended ones);
- **Financial information** (such as current investments, savings accounts, pensions, bank accounts, tax information, etc.);
- **Health information** (such that may impact the use/need for investments and any associated third parties who may provide assistance, for example, carers, etc.);
- **Authorised third parties** (such as accountants, solicitors, etc. with whom you authorise us to share financial information).

This information will be obtained directly from you as part of our client take-on process in order that we can be in a position to offer you the most appropriate investment service. We may also obtain your details from an authorised third party, which may be your registered independent financial adviser, a relative, a trustee of a trust you are connected with, anti-fraud agencies, insurers, banks and other financial institutions.

As part of our client take-on process, we are obliged by our regulator, the FCA, to obtain sufficient “suitability” information concerning your *attitude to risk*. This information may be obtained via a risk questionnaire, which will analyse your knowledge and experience of investments; your financial situation, including your ability to bear losses; and your investment objectives including risk tolerance. Church House does not make any automated decisions based upon the outcomes of the risk questionnaire.

How and why your data is used

Church House has established a number of legal bases for obtaining personal data from you:

- we are obliged to obtain personal data from you as a necessary part of entering into a contract with you to meet your specific investment needs;
- we have a legal obligation to obtain personal data from you as part of our legal and regulatory obligations; and
- we consider that we have a legitimate business interest in obtaining your personal data (but this does not override your right to privacy).

If you elect not to provide us with your personal data, this will restrict or prevent our ability to provide you with investment management services.

Church House will use your personal data for the following purposes:

Identity

We will use your personal data to identify and verify you so that we can ensure our investment services are appropriately suitable for your needs and to enable us to comply with our legal and regulatory obligations under the FCA. We store this data within personal client files via a Client Relationship Management (CRM) and portfolio management systems.

Communication

The personal data you provide, such as your telephone number(s), email and postal address, will be used by Church House to communicate with you in the course of providing investment management services to you. This will include, for example, sending you regular reports of your investments, quarterly reviews and tax packs.

Investment Management

We are obliged under the rules of the FCA to ensure that any investment products and services we recommend to you remain suitable for your investment needs. In order for Church House to assess the suitability of the investment services we provide to you, we use the following information to better design your portfolio:

- Employment
- Financial information (existing investments, source of wealth, bank details, etc)
- Knowledge & experience in investment
- Family and dependents
- Health information
- Approved third parties (such as accountant, solicitor)

We will also use your personal data to assess your overall risk attitude to define the most suitable investment solution. This will involve requesting you to complete a risk questionnaire, provided by Oxford Risk, which will assist us in helping to determine the most appropriate risk model for your investments. The results of the questionnaire will not be used in any automated decision-making processes.

Legal and regulatory obligations

We may be obliged to use your personal data to comply with our legal obligations, which may include the sharing of your data with law enforcement agencies, regulators (such as the FCA), courts or other public authorities, as required by law.

Record keeping

Church House handles a significant amount of information in the course of record keeping for the purposes of providing investment management services. We may use your personal data to ensure it is up-to-date and accurate.

We are obliged by our regulator, the FCA, to record telephone calls and other electronic communications. We maintain these records to monitor and improve our communications, the provision of our investment services and for training purposes. This data is stored securely in accordance with our data retention policies. Access to these recordings is strictly limited to those Church House employees who need to have access.

Marketing

Where you have consented on your agreement with Church House, we may contact you with information concerning our products and services that we think may be of interest. You have the right to indicate how you wish to be contacted – letter, telephone or email – and you also have the right to withdraw your consent at any time. On receipt of your withdrawal, we will no longer send you any marketing material.

Complaints

We will use your personal data to assist us in investigating and responding to any complaints you may have with Church House, or to settle any disputes that may arise. We will only use your information to provide evidence in any complaint or dispute to arrive at a mutually agreeable resolution.

Business Continuity

Church House regularly undertakes internal assessments of its operating systems and processes to ensure that the interests of Church House and its customers remains efficient and secure. We may use your personal data in the course of business disaster recovery, document storage and retention and operational continuity. This will ensure that we can continue to offer the high level of service that you expect from Church House.

Website Cookies

The Church House website uses cookies. Cookies are small text files that are stored on your device (computer, smartphone, tablet, etc.). This information is used by Church House to identify browsing actions and patterns as a means to improve the operation of our website. Cookies may also enable us to identify how you use our website and distinguish you from other users so that we can understand your browsing preferences on our website.

Church House does not use your personal data for anything other than providing our investment management services and the marketing of such. We will never sell your data to third parties for financial gain.

How your data is stored

All personal data is securely stored electronically and, where necessary, in hard copy paper format. Any paper copies are filed in lockable cabinets, which are only accessible by relevant employees.

Data systems on which personal data is recorded are password protected. Only those employees who need to see the data have access. The data is used purely for the provision of investment management services and/or the communication of relevant information concerning our products and services. Clients can opt to either receive or not receive marketing communications.

How long we keep your data

We will retain records of personal data for all of our clients on an on-going basis and will endeavour to ensure that these records are accurate and up-to-date. We are obliged by our regulator, the Financial Conduct Authority, to keep data records of our clients for at least five years from the date of the last communication, although this may be extended to seven years under HMRC rules. Where the information relates to pension transfers, pension conversions, pension opt-outs or FSAVCs, we are obliged to retain such records indefinitely.

If you have been contacted by Church House, either through the client take-on process or through promotional correspondence, it is likely that we will have recorded some personal data relating to you. If you have elected not to proceed to becoming a client or have received some promotional correspondence that you would prefer not to

continue to receive in the future, you are entitled to request Church House to delete your personal details from their records (“right to be forgotten”).

Who do we share your data with

In order to perform our duties as investment manager, Church House will share personal data with selected third parties. The third parties with whom we do share personal data have either been selected by Church House for the purposes assisting of us in fulfilling our duties as investment manager or have been identified and/or agreed by you to whom we may share your personal data, such as your accountant or your solicitor.

All of those third parties which Church House has selected have been subject to rigorous and ongoing due diligence reviews. We have in place with each such third party an agreement which identifies mutual responsibilities regarding the handling, storing and processing of personal data to ensure that the interests of our clients are protected. Such third parties include organisations that:

- Print and distribute our client-related materials, such as valuation reports, quarterly reviews, tax packs, etc.;
- Provide essential IT operating systems to enable Church House to provide the investment management services to you;
- Provide identify verification via credit reference agencies (such as Equifax and Experian) to meet our anti-money laundering obligations; and
- Act as registrars and custodians to securely hold your financial assets and money.

We may be legally obliged to share your personal data with other third parties by law, such as the Financial Conduct Authority and Her Majesty’s Revenue and Customs.

We do **not** share personal data with any third party for the purposes of marketing.

Your rights and transparency

You are entitled to request details from Church House of the personal data we hold about you on our records:

Right to be informed

You are entitled to obtain from Church House clear and understandable information about how we use your personal data, which should be provided in a concise, transparent, intelligible and easily accessible format. We provide you with our Data protection Privacy Notice, representing a concise summary of this policy.

Right of access

You have the right to request from Church House access to the personal data which we hold together with information regarding how we use that data and with whom it is shared.

Right of rectification

You have the right to request Church House to amend any of its records of your personal data which is incorrect. We will be required to rectify inaccurate personal data without undue delay.

Right to erasure ('right to be forgotten')

You have the right to request Church House to delete all of your records, but only where Church House no longer has a legitimate basis for processing your data, there are no legal grounds for Church House to retain the data and/or because you are no longer or have never been a client of Church House.

Please note, however, where you are an existing client, we will not be able to erase your data since it is necessary for us to meet our legal obligations in managing your investment needs. Furthermore, if you are no longer a client, we are obliged under the record-keeping rules of the Financial Conduct Authority, to retain your personal data for a minimum of five years from the date of the last communication between us. This period is extended to seven years for the purposes of HMRC. Where your investments relates to pension transfers, pension conversions, pension opt-outs or FSAVCs, the FCA require us to maintain your records indefinitely.

Right to object

You have the right to object at any time to the processing of your personal data by Church House but this would severely restrict our ability to provide you with any investment services and any such agreement between you and Church House would end. You are entitled to object to the use of your personal data for marketing purposes by simply withdrawing consent to receive any such material from Church House by contacting your Account Manager or member of the Client Services team.

Enquiries

Any enquiries or concerns about how your personal data is used by Church House should be sent to the Data Protection Officer at Church House, who can be contacted via dpo@church-house.co.uk or in writing at York House, 6 Coldharbour, Sherborne DT9 4JW.

Changes to this Data Protection Privacy Policy

This policy will be kept regularly under review. We may update it from time to time and make notification of such changes via our website, where this policy can be obtained.

About Church House

Church House Investment Management is the trading name of Church House Investments Limited, authorised and regulated by the Financial Conduct Authority (190548).

The registered office is York House, 6 Coldharbour, Sherborne, Dorset DT9 4JW. Registered in England, number 3475556.