

# Privacy Policy

At SVM Asset Management Limited ("SVM") we are committed to protecting your personal data. This Privacy Policy contains information about what personal data we collect; what we do with that information and who we may share it with.

This policy may be amended or updated from time to time, please check our website for any updates or changes to this policy.

## Data Controller

For the purposes of data protection law, SVM Asset Management Limited ('SVM') having its registered office at 7 Castle Street, Edinburgh, EH2 3AH, is the data controller in respect of your personal data.

## Contact Us

If you have any questions about our Privacy Policy or the information that we collect about you, please contact us at:

Head of Risk and Compliance, SVM Asset Management Limited, 7 Castle Street, Edinburgh, EH2 3AH or email [info@svmonline.co.uk](mailto:info@svmonline.co.uk).

## Collection of your personal data.

We collect personal data about you when you, or someone representing you, (e.g. a financial adviser, your employer) provide it to us by completing application forms, signing up for regular newsletters, or by contacting us by phone, email, or by any other means. We collect your personal data in the ordinary course of our relationship with you e.g. in the course of your investment in our funds.

We may also receive your personal data from a third party where they have obtained your consent to share such information.

The personal data that we collect about you and use includes:

- Personal details about you e.g. Full name; Title; Date of Birth; National Insurance number or social security number; other government issued number (tax identification number); identification document(s) (e.g. passport, driving licence, utility bill)
- Personal data you may provide about other people: e.g. Joint account holders
- Contact details e.g. address including post code; telephone number; email address (personal and/or business)
- Financial details connected to your product or service e.g. account numbers; account holder name and details; and instruction records
- Records of any correspondence with you, or anyone acting on your behalf, and SVM e.g. phone calls, emails, letters
- Cookie information collected automatically when you visit our website. Cookies are small files of information which save and retrieve information about your visit to this website - for example, how you entered our site, how you navigated through the site, and what information was of interest of you. Further information is available in our cookie policy.

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## How we use your personal data

SVM are committed to protect your personal data and we will only collect and use your personal information where it is necessary, fair and lawful to do so. We may process your personal information for the following purposes:

- to verify your identity;
- to comply with anti-money laundering and terrorism obligations and to avoid fraud;
- to provide the products and services you have requested and to manage your account;
- to respond to instructions, complaints or enquiries received by you;
- to comply with applicable laws or regulatory obligations e.g. issue of account statements, fraud prevention and monitoring and recording of telephone calls;
- communication with you via mail or other means about our products and services;
- market research and/or analysis in order to assess and improve our business and the services we offer; and/or
- to provide marketing communications to you.

The legal basis on which SVM processes personal data is to comply with applicable laws and regulations, to fulfil the company's contractual obligations with you and/or to pursue SVM's legitimate interests where these are not outweighed by your interests.

You can opt out of receiving marketing communications at any time by contacting us at [info@svmonline.co.uk](mailto:info@svmonline.co.uk) or by calling us on 0131 226 6699.

If you do not wish us to collect and use your personal data in these ways, it may mean that we will be unable to provide you with our products and services.

## Disclosure of Personal Data to third parties

We will not disclose your personal information to any third party except as set out below.

We may disclose your personal data to third parties who are performing certain functions on our behalf and to cooperate with relevant authorities. These third parties include:

- Governmental, legal, tax and regulatory, or similar authorities including the Financial Conduct Authority (FCA), HM Revenue & Customs (HMRC), Financial Ombudsman Service, Information Commissioners Office (ICO)
- Your adviser
- Accountants, auditors, lawyers and other external professional advisers to SVM or to our funds
- Credit Agencies and Reference Agencies
- Transfer Agent
- Storage Facilities, printers and mailing houses

We may also disclose your personal information to third parties:

- if we are under a duty to disclose or share your personal information in order to comply with any legal obligation. This includes sharing information with other

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companies and organisations for the purposes of fraud protection and credit risk reduction; and/or

- In the event that we sell or buy any business or assets, in which case we may disclose your personal information to the prospective buyer or seller of such business or assets.

### Use of personal data by third party data processors

Where we have engaged a third party to process your personal data, it will act as a data processor. The data processor will be subject to binding contractual obligations to (1) only process your personal data in accordance with our instructions; and (2) have measures to protect the confidentiality and security of your personal data together with any additional requirements under applicable law.

### Transferring Personal Data outside the UK and European Economic Area (EEA)

The UK and all countries within the EEA have similar standards of legal protection for your personal information. To provide some products and services some of your information may be transmitted, transferred or processed by us or the third parties that we work with outside of the UK / EEA including countries such as India. Where your information is being transferred outside of the UK / EEA we shall ensure that your information is protected to at least an equivalent level as would be applied by UK / EEA data privacy laws, for example, we will put in place legal agreements with our third party suppliers and do regular checks to ensure they meet these obligations.

### How long we keep your personal data

How long we will hold your personal data will vary and the retention period will be determined by the following criteria:

- 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.

### Data Security

Information provided by you will be held in confidence by SVM and its agents. SVM is dedicated to ensure that your personal information is protected and held securely. SVM and its agent have implemented appropriate functional, technical and organisation security measures designed to protect your personal data against accidental or unlawful destruction, loss, alteration, unauthorised access and improper disclosure.

### Your Rights

You have a number of rights under Data Protection regarding the processing of your personal data, including:

- the right to request a copy of the personal data that we hold. In most cases this will be free of charge however in some limited circumstances e.g. additional copies, an administration fee maybe applied;
- the right to request any inaccurate or incomplete personal data is corrected;

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- the right to have any personal data deleted once there is no business need or legal requirement for us to hold it;
- the right to object or restrict some processing where we do not have other legitimate grounds for processing;
- the right to withdraw your consent to receive marketing material. We will only send you marketing communications where you have given your consent to us to do so or where we believe there is a legitimate reason for doing so. You can withdraw your consent at any time;
- the right to have personal data that you provided to us transferred to another organisation;
- the right to lodge a complaint with the data protection regulator if you think that any of your rights have been infringed by us.

To exercise any of these rights or to ask a question about these rights or any other aspect of this Policy, please contact us by email at [info@svmonline.co.uk](mailto:info@svmonline.co.uk) or by post to SVM Asset Management Limited, 7 Castle Street, Edinburgh, EH2 3AH.