



## TROY ASSET MANAGEMENT LIMITED

### PRIVACY NOTICE

#### About this notice

This notice (the “**Privacy Notice**”) provides information about how Troy Asset Management Limited (“**Troy**”, “**we**”, “**us**”, “**our**”) gathers and uses personal information. We are committed to respecting the confidentiality of the personal information you supply to us and all data will be processed in accordance with data privacy laws.

You have the right to be provided with clear, transparent and easily understandable information about how we use your information and your rights. This is why we are providing you with the information in this Privacy Notice.

If you do not agree with Troy's use of your personal data as set out in this Privacy Notice, you should not submit your personal information to us. However, if you do not wish to submit your personal information, or if you wish to exercise your rights to prevent us using your data, you should be aware that we may not be able to do business with you. For more information on this, please see sections 4.1 and 0.

#### About us

We are Troy Asset Management Limited (company number **3930846**), registered at Hill House, 1 Little New Street, London EC4A 3TR. For the purposes of data privacy legislation, we will be a ‘controller’.

#### Contacting us

Should you have any questions or concerns about this Privacy Notice or the processing of personal data we hold about you, please contact us:

By post:	Troy Asset Management Limited, 33 Davies Street, London W1K 4BP
By phone:	+44(0)20 7499 4030
By email:	info@taml.co.uk

#### Your rights

You have certain rights in relation to your personal data.

##### 4.1 Your rights in connection with personal information

Under certain circumstances, by law you have the right to:

- Object to processing of your personal information where we are relying on a legitimate interest (or that of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.



- Request access to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are processing it lawfully.
- Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- Request erasure of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see above).
- Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- Request the transfer of your personal information to another party in a machine-readable, commonly used and structured format.

If you want to exercise any of these rights then please contact us using the details at section 0. The various rights are not absolute and each is subject to certain exceptions or qualifications. For example, if you wish to withdraw your consent or object to processing, we may need to discuss with you whether our use of your data needs to continue for other lawful purposes, such as fulfilment of a legal or contractual requirement.

We will respond to your request within one month of receipt of your request. In some cases we may not be able to fulfil your request to exercise the right before this date, and may need to request more time. Where we cannot provide a full response to you for any reason, we will let you know about this in our initial reply to your request.

#### **4.2 Your duty to inform us of changes**

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your working relationship with us.

#### **4.3 Fees**

You will usually not have to pay a fee to access your personal information (or to exercise any of the other rights). In some cases, we may charge a reasonable fee if your request for access is clearly unfounded or excessive, or if you request multiple copies of the information. Alternatively, we may refuse to comply with the request in such circumstances and on reasonable grounds.

#### **4.4 What we may need from you**

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

#### **4.5 Right to complain**

If you wish to request further information about any of the above rights, or if you are unhappy with how we have handled your information please contact us (see section 0 for contact details).



If you are not satisfied with our response to your complaint or believe our processing of your information does not comply with data protection law, you can make a complaint to the Information Commissioner's Office: <https://ico.org.uk/global/contact-us/> or 0303 123 1113.

## Information we collect

We collect your personal information from a variety of sources, as set out in this Privacy Notice. Where necessary we collect information directly from you or indirectly from third parties, and through your use of our website.

### 5.1 Information you provide to us

This section details the information we collect about you in the course of your use of Troy's website and otherwise in your interaction and correspondence with Troy and representatives of Troy. We may collect:

- basic personal details including your name and address (and proof of name and address), email address, telephone number, any other contact details you supply, social security number and other tax details, nationality, citizenship, tax residency, date of birth and family connections;
- details of your company's directors, shareholders, secretaries, authorised signatories and identification documents;
- banking details;
- information on your assets and/or income and/or financial dealings;
- details of business advisers you employ including wealth managers and independent financial advisers;
- records of all communications including recordings of phone calls and electronic communications with our staff and meeting notes (see below for more details); and
- employment and education history (where you send us this information as part of a job application process).

Please note that we are required to record telephone (both mobile and landline) conversations, which we will do without a warning, and to keep copies of electronic communications. We may also record other forms of communication such as video conference calls or calls made using web based platforms. We are required to keep copies of these recordings and electronic communications for a period of at least five years (or up to seven years at the request of a regulator).

### 5.2 Information we collect from other sources

We may receive information about you from third parties such as third party service providers to our funds, your advisers (including independent financial advisers), our vendors and publically available sources such as LinkedIn or company websites. We may collect the following information from third parties:

- basic personal details including your name, address, email address, telephone number and other contact details;
- information on your assets and/or income and details of your investments;



- details of business advisers you employ including wealth managers and independent financial advisers;
- data received from background checks related to a job application process. This may include criminal record checks and credit history or bankruptcy checks as required for regulatory purposes;
- details of any complaints made by you with respect to your dealings with the relevant fund or service provider to the fund;
- data received from due diligence activities (such as anti-money laundering, politically exposed persons and sanctions checks);
- fraud enquiries (for example, information from police reports); and
- employment and education history (where we are sent this information by an employment agent).

### 5.3 Information from your use of our website

We collect information about your use of our website and the devices you use. We collect information on:

- how often you access our website;
- the way in which you navigate around it;
- how long you spend on particular pages;
- the operating system, hardware, software versions, browser configuration, display size, browser configuration of the devices you use; and
- connection information such as IP addresses.

We also use cookies to log your behavioural information. For more information on our use of cookies, please refer to our cookie policy attached to this document. In particular, please note that cookies may be held by our third party website provider.

### 5.4 CCTV

We make use of CCTV at our premises for security and property management purposes and may retain recordings for such purposes.

## How we use the information we collect

### 6.1 General uses of information

The information which we collect and what we use it for will depend on the nature of our business relationship with you. We may use your information:

- to provide you with services which you have requested and to fulfil our contractual obligations towards you;
- to fulfil our contractual obligations to third parties to whom you have provided your information;



- for our internal business administration and record keeping purposes;
- to respond to your enquiries submitted through our website;
- for legal and regulatory compliance purposes, including as necessary to respond to governmental, regulatory or law enforcement agency requests;
- where required or considered appropriate, carrying out 'know-your-client' (KYC) checks and other procedures that we undertake prior to you becoming a client of ours and in the course of our ongoing business relationship; and
- for recruitment.

## 6.2 Information for marketing purposes

We may use your information to identify products and services events that we think may be of interest to you.

We will only send you marketing messages where you have consented to such contact, or in the case of products and services, where these are similar to those that we have already provided to you.

**You have the right to ask us not to send you marketing messages by post, telephone or e-mail or any combination of these at any time.** You can also let us know at any time that you wish to change your mind and to start receiving such messages.

You can do this:

- by replying directly to the marketing message;
- in case you wish to withdraw from all marketing communications, you can also unsubscribe from all marketing by clicking the appropriate link in any email you receive;
- at any time by contacting us (see section 0).

Periodically, we will remind you (possibly along with other communications) that you may unsubscribe if you no longer wish to receive communications from us. If you choose to unsubscribe, we will cease to send you such communications as mentioned above.

## Our bases for collecting and using the information

We are entitled to use your personal data in the ways set out in this Privacy Notice on the following bases:

- the use of personal data in this way is necessary for the performance of a contract with you for provision of our products and/or services or to take steps at your request prior to entering into such a contract;
- we have legal obligations that we have to discharge;
- the use of your personal data is necessary for our legitimate interests in:
  - ensuring the quality of the products and services we provide to you;
  - collecting information for marketing purposes;



- communicating with you;
  - the physical security of our premises (with regard to CCTV); and
  - statistical analysis;
- you have consented to such use; and
  - to establish, exercise or defend our legal rights for the purposes of legal proceedings.

We process your sensitive and special categories of information (this includes data concerning your health, personal data revealing your racial or ethnic origin, political opinions, religious or philosophical beliefs, or data concerning sexual orientation) where we have asked for your explicit consent or otherwise where this is necessary for the establishment, exercise or defence of legal claims, complying with a legal obligation or there is a substantial public interest in such processing.

In the case that you have obviously made information public (e.g. on social media) we will process sensitive/special categories of information for the purposes of carrying out our legal obligations.

If provision of your personal information is a legal or contractual requirement or a requirement necessary to enter into a contract with us, and you choose not to provide it, we may not be able to perform some of the tasks we need to in order to provide certain products or services to you.

If you do choose to provide your consent you can withdraw it at any time by contacting us (see section 0).

## Sharing your information

We will not disclose your personal information to third parties except as detailed in this Privacy Notice.

Where necessary, we disclose your personal data to third parties that are specifically engaged by us to provide services to us, in which case we will require those parties to keep that information confidential and secure and to use it solely for the purpose of providing the specified services to us. The following is a list of the types of third parties who may process your personal data on our behalf:

- we may share information with the following entities which we have appointed to process data on our behalf in order to allow us to provide products or services that you have requested:
  - fund administrators;
  - asset managers; and
  - custodians;
- we may provide your information to third parties engaged by us to provide services to us:
  - professional advisers, for example, accountants, auditors, compliance consultants, legal advisers and tax advisers;



- fraud prevention agencies;
  - couriers;
  - information technology, including providers of client relationship management systems, and information security providers;
  - analytics companies;
  - insurance brokers;
  - data storage suppliers;
- we may disclose to law enforcement agencies and regulators, government departments or competent authorities of the UK or of other countries, any personal data (including tax status, identity or residency or other personal and payment information, documents or self-certifications) where we are under a duty to disclose or share your information in order to comply with any legal or regulatory obligation, or if we reasonably consider that this is necessary to help prevent or detect fraud or other crime or to protect Troy's rights, property, or safety, or that of our customers or others. Such disclosure may be made directly to such regulators or competent authorities or made indirectly to our advisers or providers who will make such filings or disclosures on our behalf;
  - if we are under a duty to disclose or share your information with HM Revenue & Customs (HMRC) or other tax authorities, who may transfer it to the government or the tax authorities in another country where you may be subject to tax. Such disclosure may be made directly to such regulators or competent authorities or made indirectly to our advisers or providers who will make such filings or disclosures on our behalf;
  - if you have consented to any disclosure to a third party; and
  - if you use a financial or other adviser (as indicated on your investor application form), then details of your investments and valuations may also be provided to such adviser.

## Where we store your information

We may transfer, use and/or store your personal information outside of the UK and/or the European Economic Area ("EEA") and the laws of some of these destination countries may not offer the same standard of protection for personal information as the UK and countries within the EEA. It may also be processed by staff operating outside the UK who work for us or for one of our suppliers (for example, those who supply support services to Troy).

We currently transfer data to the following countries outside of the UK and EEA:

United States of America.

We may update this list from time to time and any changes will be communicated to you via an update to this Privacy Notice.

Transfers to our third party service providers are to enable them to use and store your personal information on our behalf. We will, however, put in place appropriate security procedures in order to protect your personal information. We also ensure that, where your information is transferred to any country outside the UK this is done using specific legally-approved safeguards. You can request further details and a copy of these by contacting us (see section 0).



## Keeping your information

We will keep your information only for as long as necessary depending on the purpose for which it was provided. Details of retention periods for different aspects of your personal information are available on request by contacting us (see section 0).

When determining the relevant retention periods, we will take into account factors including:

- our contractual and business relationships with you;
- legal obligations under applicable law to retain or dispose of data for or after a certain period of time;
- statute of limitations under applicable law(s);
- (potential) disputes; and
- guidelines issued by relevant supervisory authorities.

## Security

We acknowledge that the information you provide may be confidential and will maintain the confidentiality of and protect your information in accordance with our normal procedures and all applicable laws. We employ appropriate technical and organisational security measures to help protect your personal data against loss and to guard against access by unauthorised persons. We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

In addition, those employees, agents, contractors and other third parties who process your personal data will only do so on our instructions and they will be subject to a duty of confidentiality.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, for example by encrypting our outgoing email communications, we cannot guarantee the security of your data transmitted to our website; any transmission is at your own risk. Once we have received your information, we will use procedures and security features to try to prevent unauthorised access.

## Links to other websites

Links on Troy's website may take you to third party sites over which we have no control. While such links are provided for your convenience, you should be aware that the information handling practices of the linked websites might not be the same as ours. You should review any privacy notices on those linked websites. We are not responsible for any linked websites.

## Changes to our Privacy Notice

We reserve the right, at our discretion, to change, modify, add to, or remove portions from, our Privacy Notice. We will of course notify you of any changes where we are required to do so. Any such notifications may be made by way of our website.



## USE OF COOKIES ON OUR WEBSITE

### What is a cookie?

Cookies are small data files that many internet sites automatically download to a user's computer, phone or tablet's hard disk. They are primarily used to collect standard internet log information and visitor behaviour information. This information is used to track visitor use of a website, improve the functionality of a website and to compile statistical reports on website activity.

### What cookies will this website use and for what purpose?

This website uses cookies to store information on your computer phone and/or tablet. By storing information such as location and web pages visited, Troy Asset Management Limited ("Troy", "we", "us") can improve your browsing experience and the quality of the services we provide you. These cookies are set when you submit a form or interact with this website by doing something that goes beyond clicking on simple links. We also use some non-essential cookies to anonymously track visitors or enhance your experience of this website. The cookies that this website uses include:

*Single session cookies.* These enable this website to keep track of your movement from page to page in order to ensure that you will not be asked for the same information you have previously given during your visit to this website. These cookies allow you to proceed through this website quickly and easily without having to authenticate or reprocess each new area you visit. We may use such cookies to analyse user behaviour, such as which pages have been visited during the session, in order to improve your overall experience, for example enabling us to determine and display more relevant content.

*Persistent cookies.* These cookies enable us to collect information such as the number of visitors to this website and the pages visited (in aggregate) in order to analyse user behaviour. This information is collected in an anonymous form and will be collated with similar information received from other users to enable us to compile reports in order to develop and improve user experience by displaying more tailored and relevant content.

### Information tracking

We may use third party technology, such as Google Analytics, to provide us with information about how you use this website. This may include the use of cookies to collect anonymous information, including the number of visitors to this website, where they have come to this website from, the pages they visit and the length of



time they have spent on this website. We may use this information to compile statistics and to help us to improve our website and the services we offer. Google's privacy policy is available at <http://www.google.com/policies/privacy>.

This data is collected primarily for monitoring the usage and performance of our website. We may use your IP address and track browser types to build a profile of our users.

### **Further information about cookies**

For further information about cookies, visit [www.aboutcookies.org](http://www.aboutcookies.org) or [www.youronlinechoices.eu](http://www.youronlinechoices.eu). You can set your web browser not to accept cookies and the above websites tell you how to remove cookies from your browser. However, some of our website features may not function as a result. The way in which you adjust your browser security setting varies from browser to browser.