

Privacy Policy

We take your privacy very seriously. 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 Information. It also explains your rights in relation to your Personal Information and how to contact us or supervisory authorities in the event you have a complaint.

We collect, use and are responsible for certain Personal Information about you. When we do so we are subject to data protection laws applicable in the United Kingdom and we are responsible as 'Controller' of that Personal Information for the purposes of those laws.

Key terms

It would be helpful to start by explaining some key terms used in this policy:

We, us, our	Waystone Fund Services (UK) Limited, a company registered in England and Wales with registered address 64 St. James's Street, Nottingham, NG1 6FJ (registered company number 03720363)
Personal Information	Any information relating to an identified or identifiable individual

Personal information we collect about you

We may collect and use the following Personal Information about you:

- your name, residential address, date of birth, email address, telephone number, driving licence number, national insurance number, tax residency number, bank account name, account number and sort code.

This Personal Information is required to provide our product and/or services to you and satisfy regulatory and legal obligations. If you do not provide Personal Information we ask for (with the exception of your telephone number and email address), we cannot provide our product and/or services to you.

How your personal information is collected

We collect most of this Personal Information directly from you—on application forms, in person, by telephone, text or email and/or via our website and apps. However, we may also collect information:

- from publicly accessible sources, eg Companies House or social media websites;
- directly from a third party, eg:
 - sanctions screening providers;
 - credit reference agencies;
 - customer due diligence providers;
 - from a third party with your consent;
- from cookies on our website—for more information on our use of cookies, please see our website’s Cookies Policy; and
- via our IT systems, eg: automated monitoring of our websites and other technical systems, such as our computer networks and connections, CCTV and access control systems, communications systems, email and instant messaging systems.

How and why we use your personal information

Under data protection law, we can only use your Personal Information if we have a proper reason for doing so. In order to use your Personal Information, we rely on the following legal bases:

- processing is necessary for the performance of the products and/or services we provide to you (including preventing unauthorised access and modification to our systems);
- processing is necessary for the purposes of the legitimate business interests pursued by us (in particular, undertaking statistical analysis to help us manage our business e.g. in relation to financial performance, client base and work type); and
- processing is necessary for compliance with a legal obligation to which we are subject (including undertake screening for financial and other sanctions or embargoes and conduct checks to identify you and verify your identity.)

With whom we share your personal information

We routinely share Personal Information with:

- third parties we use to help deliver our products and/or services to you, e.g. payment service providers, banks, software providers and cloud providers;

- other third parties we use to help us run our business, e.g. auditors;
- third parties approved by you, e.g. your fund manager and your appointed Financial Adviser (if applicable);
- credit reference agencies;
- sanctions screening provider; and
- our insurers and brokers.

We only allow our service providers to handle your Personal Information if we are satisfied they take appropriate measures to protect your Personal Information. We also impose contractual obligations on service providers relating to ensure they can only use your Personal Information to provide services to us and to you. We may also share Personal Information with external auditors, e.g. in relation to ISO accreditation and the audit of our accounts.

We may disclose and exchange information with law enforcement agencies and regulatory bodies to comply with our legal and regulatory obligations.

We may also need to share some Personal Information with other parties, such as potential buyers of some or all of our business or during a re-structuring. Usually, information will be anonymised but this may not always be possible. The recipient of the information will be bound by confidentiality obligations.

We will not share your Personal Information with any other third party.

How long your personal information will be kept

We will keep your Personal Information while you have an account with us or we are providing products and/or services to you. Thereafter, we will keep your Personal Information for as long as is necessary:

- to respond to any questions, complaints or claims made by you or on your behalf;
- to show that we treated you fairly; and
- to keep records required by law

We will not retain your Personal Information for longer than necessary for the purposes set out in this policy. Different retention periods apply for different types of Personal Information. Further details on this are available on request using the contact details set out below.

When it is no longer necessary to retain your Personal Information, we will delete or anonymise it.

Transferring your personal information out of the EEA

To deliver services to you, it is sometimes necessary for us to share your Personal Information outside the European Economic Area (EEA), for example with our service providers located outside the EEA.

These transfers are subject to special rules under European and UK data protection law.

These non-EEA countries do not have the same data protection laws as the United Kingdom and EEA. We will, however, ensure the transfer complies with data protection law and all Personal Information will be secure.

If you would like further information regarding the mechanisms used to comply with data protection law, please contact us (see *How to Contact Us*, below).

Your rights

You have the following rights, which you can exercise free of charge:

These are the rights to:

Access	The right to be provided with a copy of your Personal Information (the right of access)
Rectification	The right to require us to correct any mistakes in your Personal Information
Be forgotten	The right to require us to delete your Personal Information—in certain situations
Restriction of processing	The right to require us to restrict processing of your Personal Information—in certain circumstances, e.g. if you contest the accuracy of the data
Data portability	The right to receive the Personal Information you provided to us, in a structured, commonly used and machine-readable format and/or transmit that data to a third party—in certain situations
Object	The right to object: <ul style="list-style-type: none">○ at any time to your Personal Information being processed for direct marketing (including profiling);

- in certain other situations to our continued processing of your Personal Information, e.g. processing carried out for the purpose of our legitimate interests.

Not be subject to automated individual decision-making

The right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you

For further information on each of the rights above, including the circumstances in which they do (and may not) apply, please contact us or see the:

Guidance from the UK Information Commissioner's Office (ICO) on individuals' rights under the General Data Protection Regulation.

If you would like to exercise any of those rights, please:

- email us at clientservices@waystonefs.co.uk ; or
- write to our Client Services Department at our registered address (See *How to Contact Us*, below); or
- apply in person at our registered address (See *How to Contact Us*, below); and
- let us have enough information to identify you (*eg your full name, address and customer or matter reference number*); and
- 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 what right you want to exercise and the information to which your request relates.

Keeping your personal information secure

We have appropriate security measures to prevent Personal Information from being accidentally lost, or used or accessed unlawfully. We limit access to your Personal Information to those who have a genuine business need to access 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.

If you want detailed information from *Get Safe Online* on how to protect your information and your computers and devices against fraud, identity theft, viruses and many other online problems, please visit www.getsafeonline.org. Get Safe Online is supported by HM Government and leading businesses.

How to complain

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

The General Data Protection Regulation and the UK's Data Protection Act 2018 also give you right to lodge a complaint with a supervisory authority, in particular in the European Union (or European Economic Area) state where you work, normally live or where any alleged infringement of data protection laws occurred. The supervisory authority in the UK is the Information Commissioner who may be contacted at <https://ico.org.uk/concerns> or telephone: 0303 123 1113.

Changes to this privacy policy

This privacy notice was originally published in May 2018 and was last reviewed and updated in October 2023.

We may change this privacy notice from time to time as our business requirements or the law changes. Any changes to this privacy notice will be updated on our website: www.waystone.com

How to contact us

Please contact us by post, email or telephone if you have any questions about this Privacy Policy or the information we hold about you.

Our contact details are shown below:

Waystone Fund Services (UK) Limited

64 St. James's Street

Nottingham

NG1 6FJ

United Kingdom

Email: clientservices@waystonefs.co.uk

Telephone: 01159 888 200

October 2023