

Psigma Privacy Policy

Effective date: 23rd April 2018

Psigma Investment Management Limited (Psigma, we, us or our) knows that you care how your information is used and shared and we appreciate your trust in us to do that carefully and sensibly. Your privacy is important to us and we are committed to protecting and respecting your privacy.

This Privacy Policy explains how we use your personal data, that of your dependants, and that of all authorised persons under any account you have with us. It is your responsibility to ensure that a copy of this privacy policy is provided to all such persons, and that you have the consent or other lawful justification for the provision of such data to us. This is information about you that we may collect directly from you, or it might be information that is provided to us about you by your Professional Adviser (if you have one).

Your personal data will be collected by us when you use our website, or when you complete our account opening paperwork to become a client using our services or products.

It is important that the personal data we hold about you, your dependants, authorised persons and your appointed advisers is accurate and up to date. If any of this information changes, please ensure that you let us know promptly.

- [Who we are](#)
- [Personal Data we may collect](#)
- [Personal Data we obtain from third parties](#)
- [Why we collect and use your personal data](#)
- [Who we share your personal data with](#)
- [When we process your personal data outside the EU](#)
- [How long we will retain your personal data](#)
- [Cookies and similar technologies](#)
- [Marketing and research](#)
- [Applications for employment](#)
- [How to access and control your personal data - Your rights](#)
- [Your right to withdraw consent](#)
- [Your right to make a complaint](#)
- [Changes to our Privacy Policy](#)

Who we are

We are Psigma and we are the Controller. We are part of the Punter Southall Group and our business contact details are:

Registered office: 11 Strand, London WC2N 5HR

Telephone: 020 3327 5450

Email: businessdevelopment@psigma.com

Website: www.psigma.com

Twitter: twitter.com/psigmaim

LinkedIn: <https://www.linkedin.com/company/psigma-investment-management>

The contact details of our Data Protection Officer are:

Name: Richard Garmon-Jones

Address: 11 Strand, London WC2N 5HR

Telephone: 020 3327 5182

Email: data.protection@puntersouthallgroup.com

Personal data we may collect

The specific types of personal data we may collect and use about you will depend upon the extent to which you use our website facilities, or our services or products.

The types of information we collect directly from you are:

- Personal and financial information that is collected when you complete our account opening forms and apply for our services. Information such as your contact details, date of birth, residency status, employment and tax status, your national insurance number, passport details as proof of identity and utility bill as proof of address.
- Important information that helps us to assess the suitability of our services for your needs such as, details relating to your assets and liabilities and your time horizon. In addition to this we also process your answers to our attitude to risk questionnaire in order to help us to understand your attitude to taking financial risks. This helps us to understand your needs and financial goals, and builds an investor profile that assists us in tailoring the services for your needs. This takes place at the beginning of the relationship and periodically whilst you remain a client.
- Information on the source of your wealth and the source of funds you will be transferring to Psigma in order to receive the services.
- We will collect information that helps us to contact you such as your name, email address and telephone number, when you make enquiries or request information on our services through [our website](#). We will retain information in respect of the services for which you request information.
- When using our website we will capture the information provided at the time of registering to use our site, subscribing to our service, posting material or requesting further information on our services. You may choose to email businessdevelopment@psigma.com requesting further information on our services or if you are an existing client you may use our secure client area where you may register for online services.
- We may also ask you for information regarding your user experience such as details on your browsing history when you report a problem using our website.
- If you contact us using any of the above methods, we may keep a record of that correspondence.

We will record all telephone conversations that we have with you. The types of information we collect from you automatically are:

- Details of your visits to our website including, but not limited to, traffic data, location data and other communication data, whether this is required for our own billing purposes or otherwise and the resources that you access.

Aggregate/Anonymous Data

We may aggregate and/or anonymise any personal data collected through the facilities, services or products offered so that such information can no longer be linked to you or your device. We may use this information for any purpose and may share this data with our third parties.

Please note that we need certain types of information so that we can provide the website facilities, services and products to you. If you do not provide us with such information, you may no longer be able to access or use our services or products.

Personal data we obtain from third parties

We obtain information about you from third parties when we carry out Anti Money Laundering 'AML' credit, and other checks using credit and fraud prevention agencies and other search organisations.

The data we obtain from the credit reference agency is collated by searching the records of multiple sources and is used to help us to assess the accuracy and completeness of the information you have supplied before we can accept you as a client. Such as:

- Identity verification
- Residential address verification
- Credit checks
- Politically exposed person checks
- Criminal record checks
- Sanctions checks

We may also obtain information from your professional advisers.

We also obtain information from publicly available sources such as the Electoral Register and Companies House.

Why we collect and use your personal data

We, our data processors, and other controllers to whom we provide it in order to provide our services use your information for various purposes depending on the types of information we have collected from and about you and the specific facilities, services or products you use. In particular, we collect your information for the following purposes:

- To provide you with information, products or services that you request from us.
- To take steps at your request prior to entering into a contract with you.
- To carry out our obligations arising from any contracts entered into between you and us.
- To allow you to participate in interactive features of our service, when you choose to do so.
- To notify you about changes to our service.
- To provide you with information that we feel may interest you.

The legal bases for using your information are as follows:

- Where you make an enquiry, ask a question or request information on a service or product, our processing is necessary either to take steps at your request prior to entering into a contract, or our legitimate interests in operating our business and providing services.
- Where you report a problem, it is in our and your legitimate interests to operate our business smoothly and problem free.
- Where you have requested a service or product, the use of your information is necessary for the performance of the contract we've entered into with you for the provision of those services or products. Where special categories of information are required in the performance of the contract we will normally ask for your explicit consent prior to its collection. If you do not provide your consent, it may be that we will be unable to provide all or any of the services you have requested. If that is the case, we will let you know at the time of making the request;
- Where we provide you with the website facilities, services or products you've requested, use of your information is necessary to perform our obligations under the terms of any contract we have with you, including access to our Premium Content subscription service;
- Where we collect your information automatically or you respond to a survey we use your information for our legitimate business interests. This is to provide security for our website, operate our business and provide our services and products;
- Where we provide direct marketing materials to you to keep you informed of our services that are relevant to you and that you would expect to receive from us, the use of the information is necessary for our legitimate interests in keeping our clients informed of relevant services and developing our business. We will not provide any other marketing materials to you without your consent; and
- Some information we obtain and process is necessary for compliance with a legal obligation (eg anti-money-laundering checks), necessary for the establishment exercise or defence of legal

claims, or for the substantial public interest of preventing or detecting crime and fraud (eg criminal records checks), subject to appropriate safeguards.

Who we share your personal data with

Organisation / Entity	Reason for sharing
Credit and fraud prevention agencies	<p>Psigma performs electronic searches using SmartSearch which is one of the UKs credit and fraud prevention agencies. SmartSearch accesses records maintained by, Experian, EQUIFAX and DOW JONES, the purpose of such checks is to verify the accuracy and completeness of the information you have provided to us.</p> <p>Personal data shared with SmartSearch is as follows</p> <ul style="list-style-type: none"> • Full name and date of birth • Residential address • Passport number and expiry date or driving license details • National Insurance Number <p>You can follow the link below to find SmartSeach's privacy policy (insert link) or the following link to find out more about the role of the credit reference agencies http://www.experian.co.uk/downloads/consumer/creditRefAgencyExplained.pdf</p>
Asset Risk Consultants 'ARC'	<p>ARC is an Investment Manager Research Group, and is the data processor for the Psigma Attitude to Risk 'ATR' Questionnaire. Personal data shared with ARC is as follows</p> <ul style="list-style-type: none"> • Account name or client surname and initials • Psigma client code • Answers and opinions expressed by you in the ATR questionnaire • The intended or actual value of the portfolio
Appointed Service providers	<p>Psigma uses a number of service providers; Investment Manager Research Group, Client Relationship Management 'CRM', Stockbroking Provider, Front Office Management System, Custodians, Banks, Auditors, document disposal company and</p>
HMRC/IRS and other relevant tax agencies	<p>ISA / JISA and Tax reporting or any relevant regulatory authority where we may be required to make a disclosure</p>
FCA and other Regulatory bodies	<p>Transaction reporting for the purposes of meeting our regulatory obligations and the monitoring of market abuse</p>
Wrapper providers	<p>Pension trustees, bond providers as appointed by the client, we share valuation, transaction and performance data as and when required</p>

Your professional trustees and those of your professional advisers, including your financial adviser, accountant and solicitor, that you have informed us are authorised to receive it	To provide our services to and for you
Our legal and other professional advisers and the Courts	To establish, exercise or defend legal claims, or if required to make a disclosure by a court of law or relevant market rules or codes of practice
Purchasers or potential purchasers or merger partners of Psigma or the Punter Southall Group or part of them, and their legal and other professional advisers	We would be required to share information in respect of our book of business with any potential buyer of the business or the group

Some of these, like our professional advisers and HMRC, are independent controllers, with their own privacy notices setting out how they will process personal data. Others are our processors, who process information on our behalf. We require them to commit to compliance with relevant data protection legislation.

When we process your personal data outside the EU

Under Article 45 / 46 your information is transferred outside the EEA. When we process your answers to the attitude to risk questionnaire we use Asset Risk Consultants Limited (Company number 30293) which is regulated by the Guernsey Financial Services Commission under the Protection of Investors (Bailiwick of Guernsey) Law, 2017, the data is transferred using the following mechanism:

Adequacy decision – your data is transferred to Guernsey which has been approved by the European Commission (EC). More details can be found here https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/adequacy-protection-personal-data-non-eu-countries_en.

In order to safeguard your data we take the following measures:

- The provision of the service is governed by a legal contract and a service level agreement
- The processing system is secure and is approved by our group IT infrastructure

How long we will retain your personal data

We will only keep your personal data for as long as we need to in order to fulfil the purposes for which it was collected, as set out in this Privacy Policy, and for as long as we are required to keep it by law. In order to ensure we meet our obligations, we have a designated data [retention policy](#) that relates to, but is not limited to, all physical documents, electronic versions of documents, digital voice recording and data held in systems relating to Psigma clients and indicates when personal information should be disposed of. Psigma securely disposes personal data when it is no longer needed. This will reduce the risk that it will become inaccurate, out of date or irrelevant.

Cookies and similar technologies

When we collect information automatically, as stated above, we and our service providers use internet server logs, cookies, tags, Software Development Kit, tracking pixels and other similar tracking technologies. We use these technologies in order to offer you a more tailored experience in the future, by understanding and

remembering your particular browsing preferences. As we adopt additional technologies, we may also gather information through other methods.

We also use cookies to measure the effectiveness of our marketing communications, for example they tell us if you have opened a particular marketing email.

For more information on the cookies we use, the purposes for which we use them and how you can control them please refer to our [Cookies Policy](#).

Marketing and research

You have choices when it comes to receiving marketing communications and taking part in market research. We will send you relevant news about our products and services in a number of ways including by email, but only if you have previously agreed to receive these marketing communications [or it is information that you would expect to receive from us, and we always give you the opportunity to opt out]. When you make an enquiry via our website we will ask if you would like to receive marketing communications. You can change your marketing preferences or [unsubscribe](#) at any time online.

We would also like to hear your views to help us to improve our services and products, so we may contact you for market research purposes. You always have the choice about whether to take part in our any of our surveys or market research.

Applications for employment

Our website contains a [Careers page](#) that links to a website where you can apply for employment at **Psigma**. This recruitment website is administered by Jobtrain, a Punter Southall Group (PSG) service provider. The Jobtrain website collects personal data such as your personal details, contact information and work history and qualifications. It also uses cookies and other means of collecting information, which is only used to enable you to complete your application and for analytics purposes.

Jobtrain is permitted to collect, use and share your information only as necessary to perform the functions that PSG directs it to perform. Any information that **Psigma** collect from Jobtrain in connection with the recruitment website is handled consistent with this Privacy Policy. **Psigma** will use and share your information only for employment purposes, such as communicating with you about or evaluating you for a job opportunity or where sharing is required by law.

How to access and control your personal data - Your rights

You have certain rights with respect to your information which are summarised below. Some of the rights are complex therefore, not all details are included in the summary:

- **Right to be informed:** you should be given, at the time your information is collected, or can ask for information about how your information is collected and used. A copy of this Privacy Policy can be obtained by clicking the printer icon at the top of this page;
- **Right of access:** you can ask for copies of the information that we process about you free of charge;
- **Right to rectification:** you can ask to have any inaccurate information we hold about you corrected;
- **Right to erasure:** you can ask for the information held about you to be erased (subject to certain criteria);
- **Right to restriction of processing:** you can ask us to stop processing your information (under certain circumstances);
- **Right to data portability:** you can, under certain circumstances, request that we transmit your personal information that you have provided to us to another provider of services;
- **Right to object:** you can object to your information being processed if our legal basis for processing your information is based on a "legitimate interest". To check whether we use your information for "legitimate interests" see the section "Why we collect and use your personal data" above.

You also have the right to object to direct marketing. If you make such an objection, we will cease to process your personal information for this purpose.

If you would like to exercise any of your rights mentioned above, you can do so by writing or emailing our Data Protection Officer detailed above.

Your right to withdraw consent

Where you have provided consent for us to process your information you can withdraw your consent at any time. **Please note:** Withdrawal will not affect the lawfulness of processing prior to you withdrawing your consent, and may in some circumstances mean that we are unable to provide some or all of our services to you.

You can withdraw your consent by changing your marketing preferences or unsubscribing from our marketing emails.

Your right to make a complaint

If you have a complaint about the way we process your personal data or think that we have not complied with your rights, you can make a complaint to:

The Information Commissioners Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF
Telephone: 0303 123 1113 or 01625 545745
Fax: 01625 524510
Website: www.ico.org.uk

Changes to our Privacy Policy

You will be informed of changes to this policy by dedicated service emails, when you login to your account or by notification on our website.