

OVERVIEW

Tacit Investment Management ('Tacit', 'we', 'our', 'us') is a trade name of TIML Limited. This privacy notice explains how we collect, use and share any personal information we collect in respect of prospective, current and past clients ('you', 'your'), and your rights in relation to the personal data we hold.

Personal data is any information relating to a 'natural person' (i.e. a living person) which can be connected to that person by way of identification. This can be direct identification such as by name, a unique identification number, an online identification such as IP address, or indirectly through personal characteristics.

For the purposes of data protection law, Tacit is a data controller in respect of your personal data and has responsibility under law for ensuring that our use of your personal data is in compliance with UK data protection legislation.

WHAT INFORMATION DO WE COLLECT ABOUT YOU?

We collect information about you when you engage us for investment management services, including at the introductory stage before you become a client. We will also collect information about you from third parties, for example, when we carry out routine identity checks as part of the process of becoming a client.

We collect the following types of personal data about you:

- your name, and contact information such as address, email address and telephone number.
- your date of birth, national insurance number (or other tax identification number) and due diligence information; and
- financial information.

We may also collect more sensitive personal data ("special category") about you such as information concerning your health and medical conditions. Where necessary we will obtain your explicit consent to collect and process this information. We will ensure you are provided with clear information as to why this information is required and the purposes for which it will be used. For example, we may collect information concerning your health and medical conditions so that we can recommend suitable service(s) for you and continue to tailor them to meet your financial objectives. We may also collect information when you voluntarily complete client surveys or provide feedback to us.

Information relating to usage of our website is collected using cookies. These are text files placed on your computer to collect standard internet log information and visitor behaviour information. We will use your information collected from the website to personalise your repeat visits to the site.

INFORMATION ABOUT CONNECTED INDIVIDUALS

PRIVACY NOTICE

SEPTEMBER 2020

We may need to gather personal information about your close family members and dependants in order to provide our service to you effectively. In such cases it will be your responsibility to ensure that you have the consent of the people concerned to pass their information on to us. We will provide a copy of this privacy notice for them or, where appropriate, ask you to pass the privacy information to them.

WHY DO WE NEED TO COLLECT AND USE YOUR PERSONAL DATA?

The primary legal basis that we intend to use for the processing of your data is that it is necessary for the performance of our contract with you. The information that we collect about you is essential for us to be able to carry out the services effectively that you require from us, or to engage with you at the enquiry stage before you become a client. Where special category data is required to provide suitable services to you, we will obtain your explicit consent to collect and process this information.

We may also process your personal data because it is necessary for our legitimate interests, or those of a third party. Such interests may include but are not limited to: monitoring our performance and training our staff; outsourcing portfolio administration and custody services; restructuring our business, negotiating joint ventures or other commercial initiatives; or taking legal advice for the benefit of company.

We may process your personal data to comply with our legal obligations, which may include but is not limited to: conducting background checks to confirm your identity, requirements to report to tax authorities, to assist with criminal investigations, or to meet our compliance and regulatory obligations.

In other exceptional circumstances, we may process your personal data where it is necessary to protect your or another person's vital interests, or it is necessary to establish, exercise or defend a legal claim, or we have your explicit consent to do so.

HOW WILL WE USE THE INFORMATION ABOUT YOU?

We collect information about you in order to provide you with the services for which you engage us.

RECORDING COMMUNICATIONS

Tacit records telephone and videoconference communications for several purposes, including:

- As evidence of your instructions.
- In compliance with our regulatory and compliance obligations.
- Where necessary, to establish, exercise or defend a legal claim or resolve a dispute.

WHO MIGHT WE SHARE YOUR INFORMATION WITH?

We will not share your information for marketing purposes with other companies.

In order to deliver our services to you effectively we may share your personal data with third-parties such as those that we engage for professional compliance, accountancy or legal services as well as product and platform providers that we use to arrange financial products for you.

If you have a financial adviser, an accountant or lawyer or investments held in a structure where a trustee is the legal owner and operator of the account, we may share your personal data to enable us to provide the services you have asked us to provide.

Where third-parties are involved in processing your data we will have a contract in place with them to ensure that the nature and purpose of the processing is clear, that they are subject to a duty of confidence in processing your data, and that they will only act in accordance with our written instructions.

Where it is necessary for your personal data to be shared with a third-party, we will use appropriate security measures to protect your personal data in transit, for example, password protection.

To fulfil our obligations in respect of prevention of money-laundering and other financial crime we may share your personal data with third-party agencies for identity verification purposes.

TRANSFERRING PERSONAL DATA OUTSIDE THE UK

Tacit may use certain third-party providers which have operations located outside the UK. Therefore, your personal data may be transmitted to and processed outside the European Economic Area (EEA) in countries that do not provide the same level of data protection as the UK.

Where we do so, we will put appropriate measures in place to ensure the adequate protection of your data when it is transferred outside the EEA and will endeavour to ensure that any such contractual arrangements comply with the standards required by the UK Information Commissioner.

HOW LONG DO WE KEEP HOLD OF YOUR INFORMATION?

During the course of our relationship with you, we will retain personal data which is necessary to provide services to you. We will take all reasonable steps to keep your personal data up to date throughout our relationship.

We are also subject to regulatory requirements to retain your data for specified minimum periods. These are, generally five years for investment business.

These are minimum periods, during which we have a legal obligation to retain your records.

We reserve the right to retain data for longer where we believe it is in our legitimate interests to do so. In any case, we will not keep your personal data for longer than seven years after our relationship with you has ended.

You have the right to request the deletion of your personal data. We will comply with this request, subject to the restrictions of our regulatory obligations and legitimate interests as noted above.

HOW CAN I ACCESS THE INFORMATION YOU HOLD ABOUT ME?

You have the right to request a copy of the information that we hold about you. If you would like a copy of some or all of your personal data, please email or write to us using the contact details noted below.

When your personal data is processed by automated means you have the right to ask us to move your personal data to another organisation for their use.

We have an obligation to ensure that your personal information is accurate and up to date. Please ask us to correct or remove any information that you think is incorrect.

MARKETING

We would like to send you information about our products and services which may be of interest to you. If you have agreed to receive marketing information, you may opt out at a later date.

You have a right at any time to stop us from contacting you for marketing purposes. If you no longer wish to be contacted for marketing purposes, please contact us by email, telephone, or post.

COOKIES

We use cookies to track visitor use of the website and to compile statistical reports on website activity.

For further information visit <http://www.allaboutcookies.org/>

You can set your browser not to accept cookies and the above website tells you how to remove cookies from your browser. However, in a few cases some of our website features may not function as a result.

OTHER WEBSITES

Our website contains links to other websites. This privacy policy only applies to this website so when you link to other websites you should read their own privacy policies.

WHAT CAN YOU DO IF YOU ARE UNHAPPY WITH HOW YOUR PERSONAL DATA IS PROCESSED?

You also have a right to lodge a complaint with the supervisory authority for data protection. In the UK this is:

Information Commissioner's Office

Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF
0303 123 1113 (local rate)

CHANGES TO OUR PRIVACY POLICY

We keep our privacy policy under regular review, and we will place any updates on this web page or inform you of any changes when they occur. This version of the Privacy Notice was issued on 21st September 2020.

HOW TO CONTACT US

Please contact us if you have any questions about our privacy policy or information we hold about you: by email at compliance@tacitim.com or write to us at Compliance Department, Tacit Investment Management, 31 Southampton Row, London, WC1B 5HJ.

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SEPTEMBER 2020

CONTACT DETAILS



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info@tacitim.com



www.tacitim.com

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