
PRIVACY POLICY

BACKGROUND:

Sandringham Asset Management LLP understands that your privacy is important to you and that you care about how your personal data is used. **We** respect and value the privacy of everyone who visits this website, sandringhamassetmanagement.co.uk (“**Our Site**”) and will only collect and use personal data in ways that are described here, and in a way that is consistent with **Our** obligations and your rights under the law.

Please read this Privacy Policy carefully and ensure that you understand it. Your acceptance of this Privacy Policy is requested on visiting our website.

1. Definitions and Interpretation

In this Policy the following terms shall have the following meanings:

“ Account ”	means an account required to access and/or use certain areas and features of Our Site ;
“ Cookie ”	means a small text file placed on your computer or device by Our Site when you visit certain parts of Our Site and/or when you use certain features of Our Site . Details of the Cookies used by Our Site are set out in Part 14, below; and
“ Cookie Law ”	means the relevant parts of the Privacy and Electronic Communications (EC Directive) Regulations 2003;

2. Information About us

Our Site is owned and operated by Sandringham Asset Management LLP

3. What Does This Policy Cover?

This Privacy Policy applies only to your use of **Our Site**. **Our Site** may contain links to other websites. Please note that **We** have no control over how your data is collected, stored, or used by other websites and **We** advise you to check the privacy policies of any such websites before providing any data to them.

4. What Is Personal Data?

Personal data is defined by the General Data Protection Regulation (EU Regulation 2016/679) (the “GDPR”) and the Data Protection Act 2018 (collectively, “the Data Protection Legislation”) as ‘any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier’.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

5. What Are My Rights?

Under the Data Protection Legislation, you have the following rights, which **We** will always work to uphold:

- a) The right to be informed about **Our** collection and use of your personal data. This Privacy Policy should tell you everything you need to know, but you can always contact **us** to find out more or to ask any questions using the details in Part 15.
- b) The right to access the personal data **We** hold about you. Part 13 will tell you how to do this.
- c) The right to have your personal data rectified if any of your personal data held by **us** is inaccurate or incomplete. Please contact **us** using the details in Part 15 to find out more.
- d) The right to be forgotten, i.e. the right to ask **us** to delete or otherwise dispose of any of your personal data that **We** hold. Please contact **us** using the details in Part 15 to find out more.
- e) The right to restrict (i.e. prevent) the processing of your personal data.
- f) The right to object to **us** using your personal data for a particular purpose or purposes.
- g) The right to withdraw consent. This means that, if **we are** relying on your consent as the legal basis for using your personal data, you are free to withdraw that consent at any time.
- h) The right to data portability. This means that, if you have provided personal data to **us** directly, **we are** using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask **us** for a copy of that personal data to re-use with another service or business in many cases.
- i) Rights relating to automated decision-making and profiling.

For more information about **Our** use of your personal data or exercising your rights as outlined above, please contact **us** using the details provided in Part 15.

It is important that your personal data is kept accurate and up-to-date. If any of the personal data **We** hold about you changes, please keep **us** informed as long as **We** have that data.

Further information about your rights can also be obtained from the Information Commissioner's Office or your local Citizens Advice Bureau.

If you have any cause for complaint about **Our** use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office.

We would welcome the opportunity to resolve your concerns **[ourselves] OR [myself]**, however, so please contact **us** first, using the details in Part 15.

6. What Data Do You Collect and How?

Depending upon your use of **Our** Site, **We** may collect and hold some or all of the personal and non-personal data set out in the table below, using the methods also set out in the table. Please also see Part 14 for more information about **Our** use of Cookies and similar technologies. **We** do not collect any 'special category' or 'sensitive' personal data **AND/OR** personal data relating to children **AND/OR** data relating to criminal convictions and/or offences.

Data Collected	How We Collect the Data
Identity Information	Cookies, user-input
Contact information including	Cookies, user-input
Business information	Cookies, user-input
Payment information	User-input on signup
Profile information	User-input on signup
Technical information	Cookies, user-input
Data from third parties	Cookies, user-input

7. How Do You Use My Personal Data?

Under the Data Protection Legislation, **We** must always have a lawful basis for using personal data. The following table describes how **We may** use your personal data, and **Our** lawful bases for doing so:

What We Do	What Data We Use	Our Lawful Basis
Registering you on Our Site.	Any	To maintain your account with us and improve your experience on our sites, and/or marketing purposes.
Providing and managing your Account.	Any	To maintain your account with us and improve your experience on our sites, and/or marketing purposes.
Providing and managing your access to Our Site.	Any	To maintain your account with us and improve your experience on our sites, and/or marketing purposes.
Personalising and tailoring your experience on Our Site.	Any	To maintain your account with us and improve your experience on our sites, and/or marketing purposes.
Administering Our Site.	Any	To maintain your account with us and improve your experience on our sites, and/or marketing purposes.
Administering Our business	Any	To maintain your account with us and improve your experience on our sites, and/or marketing purposes.
Supplying Our products AND/OR services to you.	Any	To maintain your account with us and improve your

		experience on our sites, and/or marketing purposes.
Managing payments for Our products AND/OR services.	Any	To maintain your account with us and improve your experience on our sites, and/or marketing purposes.
Personalising and tailoring Our products AND/OR services for you.	Any	To maintain your account with us and improve your experience on our sites, and/or marketing purposes.
Communicating with you.	Any	To maintain your account with us and improve your experience on our sites, and/or marketing purposes.
Supplying you with information by email that you have opted-in-to (you may opt-out at any time by getting in touch.	Any	To maintain your account with us and improve your experience on our sites, and/or marketing purposes.

With your permission and/or where permitted by law, **We** may also use your personal data for marketing purposes, which may include contacting you by email **AND/OR** telephone **AND/OR** text message with information, news, and offers on **Our** products **AND/OR** services. You will not be sent any unlawful marketing or spam. **We** will always work to fully protect your rights and comply with **Our** obligations under the Data Protection Legislation and the Privacy and Electronic Communications (EC Directive) Regulations 2003, and you will always have the opportunity to opt-out. **We** will always obtain your express opt-in consent before sharing your personal data with third parties for marketing purposes and you will be able to opt-out at any time.

We will only use your personal data for the purpose(s) for which it was originally collected unless **We** reasonably believe that another purpose is compatible with that or those original purpose(s) and need to use your personal data for that purpose. If **We** do use your personal data in this way and you wish **us** to explain how the new purpose is compatible with the original, please contact **us** using the details in Part 15.

If **We** need to use your personal data for a purpose that is unrelated to, or incompatible with, the purpose(s) for which it was originally collected, **We** will inform you and explain the legal basis which allows **us** to do so.

In some circumstances, where permitted or required by law, **We** may process your personal data without your knowledge or consent. This will only be done within the bounds of the Data Protection Legislation and your legal rights

8. How Long Will You Keep My Personal Data?

We will not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. Your personal data will therefore be kept for the following periods (or, where there is no fixed period, the following factors will be used to determine how long it is kept):

Type of Data	How Long We Keep It
Identity Information	No more than 30 days after your last visit to our website, unless you hold an account with us.
Contact information	No more than 30 days after your last visit to our website, unless you hold an account with us.
Business information	No more than 30 days after your last visit to our website, unless you hold an account with us.
Payment information	No more than 30 days after your last visit to our website, unless you hold an account with us.
Profile information	No more than 30 days after your last visit to our website, unless you hold an account with us.
Technical information	No more than 30 days after your last visit to our website, unless you hold an account with us.

9. How and Where Do You Store or Transfer My Personal Data?

We will only store or transfer your personal data within the UK. This means that it will be fully protected under the Data Protection Legislation.

10. Do You Share My Personal Data?

We may share your personal data with other companies in **Our** group for analytics, marketing and account maintenance purposes. This includes subsidiaries **AND/OR** **Our** holding company and its subsidiaries.

If any of your personal data is shared with a third party, as described above, **We** will take steps to ensure that your personal data is handled safely, securely, and in accordance with your rights, **Our** obligations, and the third party's obligations under the law, as described above in Part 9.

If **We** sell, transfer, or merge parts of **Our** business or assets, your personal data may be transferred to a third party. Any new owner of **Our** business may continue to use your personal data in the same way(s) that **We** have used it, as specified in this Privacy Policy.

In some limited circumstances, **We** may be legally required to share certain personal data, which might include yours, if **we are** involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

11. How Can I Control My Personal Data?

11.1 In addition to your rights under the Data Protection Legislation, set out in Part 5, when you submit personal data via **Our** Site, you may be given options to restrict **Our** use of your personal data. In particular, **We** aim to give you strong controls on **Our** use of your data for direct marketing purposes (including the

ability to opt-out of receiving emails from **us** which you may do by unsubscribing using the links provided in **Our** emails and at the point of providing your details and by managing your Account).

- 11.2 You may also wish to sign up to one or more of the preference services operating in the UK: The Telephone Preference Service ("the TPS"), the Corporate Telephone Preference Service ("the CTPS"), and the Mailing Preference Service ("the MPS"). These may help to prevent you receiving unsolicited marketing. Please note, however, that these services will not prevent you from receiving marketing communications that you have consented to receiving.

12. **Can I Withhold Information?**

You may access certain areas of **Our** Site without providing any personal data at all. However, to use all features and functions available on **Our** Site you may be required to submit or allow for the collection of certain data.

13. **How Can I Access My Personal Data?**

If you want to know what personal data **We** have about you, you can ask **us** for details of that personal data and for a copy of it (where any such personal data is held). This is known as a "subject access request".

All subject access requests should be made in writing and sent to the email or postal addresses shown in Part 15. To make this as easy as possible for you, a Subject Access Request Form is available for you to use. You do not have to use this form, but it is the easiest way to tell **us** everything **We** need to know to respond to your request as quickly as possible.

There is not normally any charge for a subject access request. If your request is 'manifestly unfounded or excessive' (for example, if you make repetitive requests) a fee may be charged to cover **Our** administrative costs in responding.

We will respond to your subject access request within 14 days and, in any case, not more than one month of receiving it. Normally, **We** aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date **We** receive your request. You will be kept fully informed of **Our** progress.

14. **How Do You Use Cookies?**

Our Site may place and access certain first-party Cookies on your computer or device. First-party Cookies are those placed directly by **us** and are used only by **us**. **We** use Cookies to facilitate and improve your experience of **Our** Site and to provide and improve **Our** products **AND/OR** services. **We** have carefully chosen these Cookies and have taken steps to ensure that your privacy and personal data is protected and respected at all times.

All Cookies used by and on **Our** Site are used in accordance with current Cookie Law.

Before Cookies are placed on your computer or device, you will be shown a pop-up requesting your consent to set those Cookies. By giving your consent to the placing of Cookies you are enabling **us** to provide the best possible experience and service to you. You may, if you wish, deny consent to the placing of Cookies; however certain

features of **Our** Site may not function fully or as intended.

Certain features of **Our** Site depend on Cookies to function. Cookie Law deems these Cookies to be “strictly necessary”. These Cookies are shown in the table below. Your consent will not be sought to place these Cookies, but it is still important that you are aware of them. You may still block these Cookies by changing your internet browser’s settings as detailed below, but please be aware that **Our** Site may not work properly if you do so. **We** have taken great care to ensure that your privacy is not at risk by allowing them.

Our Site uses analytics services provided by Google. Website analytics refers to a set of tools used to collect and analyse anonymous usage information, enabling **us** to better understand how **Our** Site is used. This, in turn, enables **us** to improve **Our** Site and the products **AND/OR** services offered through it.

The analytics service(s) used by **Our** Site use(s) Cookies to gather the required information. You do not have to allow **us** to use these Cookies, however whilst **Our** use of them does not pose any risk to your privacy or your safe use of **Our** Site, it does enable **us** to continually improve **Our** Site, making it a better and more useful experience for you.

The analytics service(s) used by **Our** Site use(s) the following Cookies:

Name of Cookie	First / Third Party	Provider	Purpose
_ga	Third	Google	Analytics
_gat_gtag_UA_124994350_4	Third	Google	Analytics
_gid	Third	Google	Analytics

In addition to the controls that **We** provide, you can choose to enable or disable Cookies in your internet browser. Most internet browsers also enable you to choose whether you wish to disable all Cookies or only third-party Cookies. By default, most internet browsers accept Cookies, but this can be changed. For further details, please consult the help menu in your internet browser or the documentation that came with your device.

You can choose to delete Cookies on your computer or device at any time, however you may lose any information that enables you to access **Our** Site more quickly and efficiently including, but not limited to, login and personalisation settings.

It is recommended that you keep your internet browser and operating system up-to-date and that you consult the help and guidance provided by the developer of your internet browser and manufacturer of your computer or device if you are unsure about adjusting your privacy settings.

15. **How Do I Contact You?**

To contact **us** about anything to do with your personal data and data protection, including to make a subject access request, please use the following details (for the attention of Managing Director):

Email address: info@sandringhamassetmanagement.co.uk

16. **Changes to this Privacy Policy**

We may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if **We** change **Our** business in a way that affects personal data protection.

Any changes will be immediately posted on **Our** Site and you will be deemed to have accepted the terms of the Privacy Policy on your first use of **Our** Site following the alterations. **We** recommend that you check this page regularly to keep up-to-date. This Privacy Policy was last updated on 05/01/2019.