

**iAMCAPITAL**

# **IAM CAPITAL PRIVACY POLICY**

**2022**



## **IAM Invest Limited – Privacy Policy**

iAM Capital Group plc and iAM Invest Ltd (collectively “IAM”) are committed to protecting your personal data and your privacy. We endeavour to ensure that any personal data we collect about you will be held and processed strictly in accordance with the Data Protection Act 1998 (DPA) and, on and from 25 May 2018, the European General Data Protection Regulation (GDPR). The terms Personal Data, Data Controller and processing have the meanings given to them in the GDPR unless otherwise indicated.

### **1. Scope**

This Privacy Policy demonstrates how IAM handles the Personal Data you provide to us:

- by your interacting with us as a prospective, current or former client and/or in connection with ongoing services we are providing to you or your organisation;
- by your using or submitting information to us through our internet website [www.iamcapital.com](http://www.iamcapital.com);
- by your subscribing to our newsletter or email lists;
- by your inquiring about or applying for a job with IAM; and
- by your inquiring about specific business or investment opportunities.

### **2. Identity and Contact Details of Data Controller**

For the purposes of the DPA and the GDPR, IAM is the controller of your data. If you have any queries regarding this policy or complaints about our use of your data, please contact us at the address below and we will do our best to deal with your complaint or query as soon as possible.

iAM Capital Group plc 4 Hill Street

London

W1J 5NE

United Kingdom

FAO: Data Processing

### **3. Your Data**

When we collect personal data about you, this will comprise a combination of one or all of the following:

- your name;
- your contact details, consisting of professional / work telephone / mobile number, email address and office address;
- your home address where relevant to or necessary for our compliance obligations or adherence to industry practice;
- the history of your relationship with us;
- your job title;
- the name of your employer;
- information about your preferred investment or sector focus; and
- information you provide to us or which we obtain from public sources in connection

with “Know Your Client” and related requests.

We may in exceptional circumstances collect data about any past criminal convictions where you have disclosed this to us in the course of business.

We will neither collect nor hold any other personal data relating to any of your ethnicity, religion or other data that might be described as sensitive.

#### **4. What We Use Your Data For**

The following sets out the purposes for which we may process your data and the legal basis for the processing:

- To provide services to you.
- We are unable to provide services to you unless you disclose personal data to us. That may include the services set out in our Engagement Letter with you or subscription documents which you sign, the provision to you of our Newsletter or our response to any enquiry you have submitted. As such, your disclosure of personal data to us is on the legal basis of our performance of our contract with you and our legitimate interest in so doing.
- To contact you in connection with potential investments, business partnerships, joint ventures.
- To assess your candidacy for a job position with us.
- To respond to requests for information from regulated bodies or government agencies.
- Exceptionally we may be requested or required to disclose to the Financial Conduct Authority or other regulators details about you and the services we provide. As such, our disclosure of your personal data to us is on the legal basis of our compliance with a legal obligation or our legitimate interest in so doing.
- To keep you informed of any activities undertaken by us which we believe may be of interest to you.
- This use will include sending you email and postal marketing, including a Newsletter, from time to time. Your consent will be requested when you submit your data to us online.
- Website analysis.
- We use technologies like cookies and pixel tags to provide, improve, protect, and promote our services. For example, cookies help us with things like remembering your username for your next visit, understanding how you are interacting with our website, and improving our interface based on that information. You can set your browser to not accept cookies.

#### **5. How We Secure Your Data**

We recognise the need to ensure that your data remains secure.

Our web site has security measures in place to protect against the loss, misuse and alteration of the personal information under our control. Our security measures include the use of a hardware firewall to prevent unauthorised access. You acknowledge that although we exercise adequate care and security there remains a risk that information transmitted over the Internet and stored by computer may be intercepted or accessed by an unauthorised third party.

Our data protections controls include the following processes:

- password/access controls over all firm devices to ensure that they are only accessed by IAM staff; and
- routine and periodic back-ups to on-line suppliers and to external storage media, in each case with data protection and security features that meet or exceed applicable standards. The latter are held securely off site.

## **6. Who We Share Your Data With**

Please note that we may on occasion be required to share your information with the following categories of recipients:

- Third parties who provide services on our behalf. For example, we use MailChimp to provide marketing automation services and Microsoft OneDrive for Business and Dropbox for periodic and routine back-up. We have taken steps to ensure that all such entities keep your data confidential and secure and only use it for the purposes that we have specified and have informed you of. Our service providers are subject to data processing agreements that are, or are in the process of being updated to become, compliant with the requirements set out in the GDPR.

In relation to any other third parties, we will only disclose your information in the following circumstances:

- where you have given your consent;
- where we are required to do so by law or enforceable request by a regulatory body;
- where it is necessary for the purpose of, or in connection with legal proceedings or in order to exercise or defend legal rights; and
- if we sell our company, go out of business, or merge with another company.

## **7. International Transfers**

In certain circumstances, we may transfer your data to countries outside the EEA, which may not adhere to the same levels of data protection to which countries within the EEA are subject. Any such transfers are, at all times, made in accordance with the DPA and the GDPR. Details of the circumstances and mechanisms in place to ensure compliance are set out below.

We use MailChimp to provide marketing automation services in relation to our IAM mail list subscribers. If you subscribed through our IAM website or have consented to IAM using your data to send you marketing communications, your data may be transferred to MailChimp's servers in the United States. The company that operates MailChimp, The Rocket Science Group LLC, participates in and has certified its compliance with the EU-U.S. Privacy Shield Framework. Transfers of Personal Data to MailChimp in the United States are therefore made subject to appropriate safeguards in accordance with the DPA and the GDPR. MailChimp's privacy policy can be viewed [here](#).

## **8. Retention Period**

Your data will be stored for a maximum period of 6 years, after which time it will generally be destroyed if it is no longer required for the lawful purpose(s) for which it was obtained or its retention is not required by applicable law or regulation. If you consent to marketing, any information we use for this purpose will be kept with us until you notify us that you no longer wish to receive this information, unless we request your consent to store it for a longer period.

## **9. Your Right In Relation to Your Data**

Under the GDPR, you will have the following rights in relation to how we process your data:

- Right to request access – you may obtain confirmation from us as to whether or not your data is being processed and, where that is the case, access to your data.
- Right to rectification and erasure – you have the right to obtain rectification of inaccurate personal data we hold concerning you and to obtain the erasure of your data without undue delay in certain circumstances.
- Right to restriction of processing or to object to processing – you may require us to restrict the processing we carry out on your data in certain circumstances or to object to us processing your data.
- Right to data portability – you have the right to receive your data in a structured, commonly used and machine-readable format.
- Right to withdraw consent – where you have provided your consent to us processing your data, you have the right to withdraw your consent at any time. This can be done by contacting us at the above address at any time or by clicking the “unsubscribe” link on any marketing communications you receive from us.
- Right to lodge a complaint – you may lodge a complaint with the Information Commissioner’s Office.
- For further information on your rights, please see the Information Commissioner’s website here.

#### **10. Additional Information**

There is no statutory or contractual requirement for you to provide your data to us and you are not obliged to do so. Please note, however, that we may not be able to provide you with the services you have requested if you do not provide your contact details. As set out in our cookies policy, our website may not be able to function fully if you do not agree to certain cookies being set on your computer.

We do not undertake automated decision-making or profiling on your data.

We keep our privacy policy under constant review and may change it from time to time to reflect our practices or to remain compliant with relevant legislation. We will notify you of any material changes to our privacy policy via a notification on our website. Your continued use of this website or our other marketing services, following the posting of changes to these terms, will mean you accept these changes.

#### **11. Links**

Our website may contain links to other websites belonging to third parties. We do not control the privacy practices of these other websites.