

Patronus Partners Limited Privacy Policy

1. Background – purpose of the policy etc
2. What kinds of personal information about you do we process?
3. What is the legal basis under which we process your data?
4. What do we use your personal data for?
5. When do we share your personal information with other organisations?
6. How long will we store your information for?
7. Is your personal information transferred outside the UK or the EEA?
8. Where do we store your personal data?
9. What cookies do we use?
10. What should you do if your personal information changes?
11. Do you have to provide your personal information to us?
12. What are your rights under data protection laws?
13. Your right to object

1. Background

This privacy policy lets you know what happens to any personal data that you give to us, or any that we collect from you or about you. It applies to all products and services and instances where we collect your personal data. This privacy notice applies to personal information processed by or on behalf of Patronus Partners Limited (Patronus).

Changes to this Privacy notice

We may change this privacy notice from time to time by updating this page in order to reflect changes in the law and/or our privacy practices. We encourage you to check this privacy notice for changes whenever you visit our website – <http://patronuspartners.com>

Patronus Partners Limited

We are Patronus Partners Limited, 3 Fitzhardinge Street, London, W1H 6EF. We are a data controller and processor of your personal data. We have a dedicated data protection officer (“DPO”). You can contact the DPO by phoning our office on 0203 818 5300, writing to the DPO at the address above or going to [Contact Us](#).

2. What kinds of personal information do we hold and process about you?

The personal information that we’ll process may include:

- Personal and contact details such as title, full name and contact details
- Your date of birth, place of birth, age and marital status
- Your citizenship status, tax residency, National Insurance Number and copies of personal identification documents (for example passport and driving licence).
- Names of beneficiaries and those people who have authority to deal on your account
- Details about your financial situation such as your salary, income, savings and liabilities
- Details about your current employment status
- Your background, education and work experience, as well as trading and investment experience
- Your financial objectives and expectations and any financial obligations you have to meet
- Details of your attitude to risk and your detailed risk profile
- Records of your contact with us in terms of your instructions to us, any correspondence between us
- Conversations you have with us either on our mobiles or landline, are recorded
- Meeting notes taken by your Broker during their meetings with you
- Dealing instructions, payment requests
- Details of any accounts you hold with any of our service providers, over which we have POA



Patronus Partners Limited Privacy Policy

3. What is the legal basis under which we process your data?

To control and process data requires one of six recognised legal bases under GDPR to do so. The six bases are as follows:

- I. **Consent:**
Consent must be freely given, specific, informed and unambiguous. There must be a positive opt-in – consent cannot be inferred from silence, pre-ticked boxes or inactivity. It must also be separate from other terms and conditions, and simple ways for the withdrawal of consent will be required.
- II. **Contract:**
Processing is necessary for a contract with an individual, or because that individual has asked that specific steps be taken before entering into a contract.
- III. **Legal obligation:**
Processing is necessary to comply with the law (not including contractual obligations).
- IV. **Vital interests:**
Processing is necessary to protect an individual's life.
- V. **Public task:**
Processing is necessary for the performance of a task in the public interest or for official functions, and the task or function has a clear basis in law.
- VI. **Legitimate interests:**
 - a. Processing is necessary for our legitimate interests or the legitimate interests of a third party unless there is a good reason to protect the individual's personal data which overrides those legitimate interests.
 - b. In order to rely on a 'legitimate interest' basis we undertake a three-part test which must be satisfied:
 1. A legitimate interest has been identified;
 2. It can be shown that processing is necessary to achieve it; and

Such processing has been balanced against the individual's [data subject's] interests, rights and freedoms.

The following table identifies the types of data we may collect, control and process; and the legal basis we rely upon for doing so:

Type of information collected.	Purpose[s]	Legal basis for processing
Data Subject's name, address, telephone numbers, e-mail address(es).	Managing the Data Subject's relationship with the firm.	Performing the Firm's contract with the Data Subject.
The number of Data Subject's dependants.	Managing the Data Subject's and their dependants'	Performing the Firm's contract with the Data Subject.
Bank account details or payment details	To know where to accept client funds from and where to pay back them back.	To fulfil the contract between the Firm and the Data Subject.
Data Subject's financial experience, trading history and financial situation.	To enable us to assess suitability and appropriateness of the products and services requested	Performing the Firm's contract with the Data Subject.

Patronus Partners Limited Privacy Policy

4. What do we use your personal information for?

We use the information we hold about you for the following purposes:

To understand your situation both personally and financially to assess which products and services are right for you

Providing you with the product or service you have signed up for

Contacting you in a way that best suits your preferences

Liaising with our suppliers to provide you with the service you applied for

Reporting to you the current or past status of your account

To ensure you are complying with certain restrictions placed on your account for example treatment of tax wrappers, SIPPs

To carry out AML checks and PEP and sanction checks on you

To carry out our obligations arising from any contracts entered into by us

To provide you with information about the products and services you have signed up for

To notify you of changes to our services

5. When do we share your personal information with other organisations?

We may share your personal information with our third party providers, sub-contractors and partners in order to provide you with the service or products you have signed up for. Further details are available in our Terms and Conditions.

In these circumstances we share only data that is essential for carrying out our business.

We will share your data, when requested to do so by governmental agencies and regulatory bodies for example HMRC, the Financial Conduct Authority, the Prudential Regulation Authority, the Financial Ombudsman Service, the Information Commissioner's Office and under the Financial Services Compensation Scheme.

We may also share your data with fraud prevention agencies in order to prevent or detect financial and other crime. We do not share or sell your information to marketing agencies or to companies for marketing purposes.

6. How long will we store your information for?

Our regulators, the Financial Conduct Authority, state that we need to store your data for at least 5 years after you stop being a client of ours. In some cases, they may ask us to keep your data for up to 7 years.

7. Is your personal information transferred outside the UK or the EEA?

We're based in the UK but sometimes your personal information may be transferred outside the European Economic Area. If we do so, we will make sure that global data protection operations equal to the required safeguards in the EEA are in place before any information is transferred.

8. What do we use cookies for?

A cookie is a small text file which may be placed onto your computer or device when you access the Website. We use cookies to help the Website work more efficiently, as well as improve your experience of using it.

Please note that none of the cookies which we place on your computer or device can identify you personally or use any of your personal data.

By selecting 'Private Client' or 'Intermediary' on the Website's homepage you agree to our use of cookies as detailed in this policy.



Patronus Partners Limited Privacy Policy

What cookies do you use and why?

The table below details the cookies we use and why we use them:

Cookie	Why we use the cookie
Accepted	This cookie is placed on your computer or device when you agree to our use of cookies (as per above) and allows us to remember that you have accepted the terms of this policy. This means that we don't have to display the cookies banner to you every time you visit the Website. This cookie will remain on your computer or device for 24 months.
Audience type	This cookie is placed on your computer or device to allow us to remember whether you selected 'Private Client' or 'Intermediary' on the Website's homepage. This means that you don't have to click on the option that applies to you each time you visit the Website and allows you to go directly to the content that is relevant for you. This cookie will remain on your computer or device for 24 months.
Google analytics	These cookies are used to collect information about how visitors use our Website. We use the information they provide to compile reports and to help us improve the Website. These cookies collect information such as the number of visitors to the Website, where the visitors have come from and the pages on our Website which they visit. These cookies will remain on your computer or device for 3 months.
Sitecore analytics	These cookies are used to collect information about how visitors use our site. We use the information they provide to compile reports and to help us improve the Website. They also allow us to identify the type of computer or device the Website is being accessed from so that the correct version of the Website can be displayed. These cookies will remain on your computer or device for 24 months.
AddThis	We use a tool supplied by AddThis to allow the users of our Website to easily link to a variety of social media platforms. When you click on a button linking to such a social media platform, AddThis may place their own and other third party cookies on your computer or device. 7IM does not control these cookies and you should read AddThis's cookies policy for more information.

How do I turn off cookies?

If you do not want to accept cookies, you can change your browser settings so that cookies are not accepted. If you do this, please be aware that you may lose some of the functionality of the Website.

For further information about cookies and how to disable them please go to the Information Commissioner's webpage on cookies at <https://ico.org.uk/for-the-public/online/cookies/> or visit <https://www.youronlinechoices.eu>.

9. Where do we store your personal information?

We store your information securely using a recognised third party provider of data storage. Access to your account is hosted by one of our partners, as a client, you have entered into an agreement with them.

10. What should you do if your personal information changes?

You should tell us so that we can update our records.

11. Do you have to provide your personal information to us?

We are unable to provide you with our products or services if you do not provide certain information to us. In cases where providing some personal information is optional we will make this clear.

Patronus Partners Limited Privacy Policy

12. What are your rights under data protection laws?

Here is a list of the rights that all individuals have under data protection laws. They don't apply in all circumstances. If you wish to use any of them, we'll explain at that time if they are engaged or not. The right of data portability is only relevant from May 2018.

The right to be informed about the processing of your personal information

The right to have your personal information corrected if it is inaccurate and to have incomplete personal information completed

The right to object to processing of your personal information

The right to restrict processing of your personal information

The right to have your personal information erased (the "right to be forgotten")

The right to request access to your personal information and to obtain information about how we process it

The right to move, copy or transfer your personal information ("data portability")

Rights in relation to automated decision making which has a legal effect or otherwise significantly affects you

You have the right to complain to the Information Commissioner's Office which enforces data protection laws: <https://ico.org.uk/>. You can contact us using the details below.

13. Your right to object

You have the right to object to certain purposes for processing, in particular to data processed for direct marketing purposes and to data processed for certain reasons based on our legitimate interests. You can contact us by going to the Contact Us section of our website to exercise these rights.

Contact Us

If you have any questions about this privacy notice, or if you wish to exercise your rights or contact the DPO, you can contact us by going to the Contact Us section of our website. Alternatively, you can write to Patronus Partners limited, 3 Fitzhardinge Street, London, W1H 6EF marking it for the attention of the DPO.