



## Privacy & Data Protection Notice

Longdean Capital LLP ("Longdean Capital") is a company registered in England and Wales with company number OC423204.

For the purposes of the General Data Protection Regulation ("GDPR"), Longdean Capital will be the 'controller' of the personal data you provide. Please read the following information carefully in order to understand Longdean Capital's practices in relation to the treatment of your personal data.

### **What data privacy principles does Longdean Capital adhere to?**

- Longdean Capital will process all personal data in a lawfully, fair and transparent manner;
- Longdean Capital will only collect personal data where it is necessary;
- For Longdean Capital to provide a service to you;
- For you to provide a service to Longdean Capital;
- For Longdean Capital to keep you informed of its products and services; or
- For Longdean Capital to comply with its legal and regulatory obligations.
- The personal data collected by Longdean Capital will be adequate, relevant and limited to what is necessary in relation to the specific purpose for which your data will be processed;
- Longdean Capital will take all reasonable steps to ensure that personal data is accurate and, where necessary, kept up-to-date;
- Longdean Capital will maintain personal data in a form that permits identification no longer than is necessary for the purposes for which the personal data has been collected for processing;
- Longdean Capital will hold and process personal data in a manner that ensures appropriate security;
- Longdean Capital will only share personal data where it is necessary to provide the agreed service or where it is necessary for the Firm to comply with its legal and regulatory requirements.
- Longdean Capital will only utilise a service provider based outside of the EEA for the processing of personal data where this is strictly necessary to facilitate our services to you. In all cases, we will ensure service providers are fully compliant with GDPR ahead of transferring any personal data.

## **What personal data does Longdean Capital collect and why?**

As a client or contact of Longdean Capital, we will require some personal information in order to verify your identity and have the applicable relationship with you. Some of this information may be required to satisfy legal obligations (e.g. to comply with obligations arising under the money laundering regulations whereas other information may be required in connection with the provision of services to you). The information collected will vary depending on the relationship but will typically include:

- Personal information: Such as your name
- Contact information: Including your address, telephone number and email address.

## **Where does Longdean Capital store my personal data?**

Longdean Capital has comprehensive policies and procedures in place to ensure your personal data is kept safe and secure, with these including:

- Data encryption;
- Firewalls;
- Intrusion detection;
- 24/7 physical protection of the facilities where your data is stored (i.e. Microsoft's UK data centres);
- Background checks for personnel that access physical facilities; and
- Security procedures across all service operations

## **How long does Longdean Capital retain personal data?**

Longdean Capital is required to maintain its books and records for a prescribed period (five years from either the ceasing of a business relationship, or, in the case of non-clients, from the making of a record – or alternatively, for seven years, where specifically requested to do so by the Financial Conduct Authority). As such, information that falls in scope of either of these requirements is retained in line with the mandated timeframe.

Any information that is outside the scope of this requirement will be retained whilst relevant and useful, and destroyed where this ceases to be the case or where the data subject specifically requests.

## **How have I been categorised in accordance with GDPR?**

The GDPR requires Longdean Capital to inform you of the legal basis on which we maintain your personal data. Typically, Longdean Capital will reach out to you personally to confirm this; however, as a general rule the following is applicable:

- Clients – Information is maintained on the basis of contractual obligation and/or legitimate interests (where relevant);

- Service providers – Information is maintained on the basis of contractual obligation; and
- Database/marketing contacts – Information is maintained on the basis of legitimate interest.

## **What are my rights?**

Once you have provided your details to Longdean Capital, you have certain rights which apply, depending on the nature of the relationship, the information you have shared with us and Longdean Capital's legal and regulatory obligations.

- You have the right to request a copy of the information that we hold about you. If you would like to request a copy of some, or all, of your personal information, please email: [info@longdean.com](mailto:info@longdean.com)
- Longdean Capital will provide this information to you within one month (with the ability to extend this by an additional two months where necessary), free of charge
- You have the right to request that the information that Longdean Capital holds about you is erased under certain circumstances including where there is no additional legal and/or regulatory requirement for us to retain the information
- As a client, you have the right to request that any information that Longdean Capital holds about you be provided to another company in a commonly used and machine-readable format, otherwise known as 'data portability'
- You have the right to ensure that your personal information is accurate and up to date, or where necessary rectified. Where you feel that your personal data is incorrect or inaccurate and should therefore be updated, please contact [info@longdean.com](mailto:info@longdean.com)
- You have the right to object to your information being processed, for example for direct marketing purposes
- You have the right to restrict the processing of your information, for example limiting the material that you receive or where your information is transferred
- You have the right to object to any decisions based on the automated processing of your personal data, including profiling
- You have the right to lodge a complaint with the Information Commissioner's Office if you feel that we have not processed your data in accordance with GDPR, any contractual agreements or this privacy notice

## **Will I be notified of changes to this policy?**

Longdean Capital may, from time to time, review and update this policy. The latest version will be maintained on the company website. Where material changes are made, Longdean Capital will make you aware of the changes, if relevant.

## **Who should I direct questions to?**

If you have any questions, concerns or complaints about the practices contained within this document or how the Firm has handled your data, please email: [info@longdean.com](mailto:info@longdean.com).