

## PRIVACY NOTICE

As a valued client of Londinium DAC (“Londinium” or the “Company”), we are committed to respecting and protecting your privacy. We know your personal information is important to you and it is equally important to us.

The purpose of this *Privacy Notice* is to provide you with a general statement on the personal information we collect about you, what that information is used for and your rights around how we use it. Please read this *Privacy Notice* to understand how and why we use your personal information. If you give us personal information about someone else, please make sure you have their permission and make them aware of this *Privacy Notice*, as it also applies to them.

### 1. WHY WE COLLECT PERSONAL INFORMATION FROM YOU

As a client of Londinium, we process personal information about you and we do this for a number of specific reasons, primarily:

- for the purpose of providing the agreed wealth management services to you under your contract with Londinium;
- for the purpose of providing fund management services to investment undertakings;
- in order to comply with statutory obligations and other tax and regulatory requirements which we are subject to (for example, anti-money laundering requirements); and
- in order to provide you with information in relation to Londinium services.

### 2. THE PERSONAL INFORMATION WE COLLECT FROM YOU

Personal information means any information about you from which you could be identified, for example your name, date of birth, contact and bank account details. In order to be able to make the most appropriate investment decisions on your behalf, we may ask for other information, which can include health, employment, marital status, pension and salary information.

You are not required to provide us with any of the personal information we request from you, but failure to do so may result in our being unable to open or maintain your relationship or provide you with the investment services requested. To help us maintain the accuracy of your personal data, please notify us of any changes as soon as possible.

### 3. CONSENT AND HOW TO WITHDRAW IT

As we process your personal information based on your consent, you have to acknowledge that you have the right to withdraw that consent at any time. The opt-out methods shall depend on how the consent was collected and shall be explained when you give us your consent. You will also be able to withdraw consent by contacting us directly using the details in section 9 of this *Privacy Notice*.

---

#### **4. HOW WE COLLECT PERSONAL INFORMATION FROM YOU (including through our website)**

The information we collect comes primarily from your application form / due diligence questionnaire / written agreement with us, transaction records, email correspondence and telephone calls (if any) and your online use of our website, mainly through the use of cookies.

**Cookies** are small pieces of information, stored in simple text files, placed on your computer by a website. Cookies can be read by the website on your subsequent visits. The information stored in a cookie may relate to your browsing habits on the website, or a unique identification number, so that the website can identify you on your return visit. Generally, cookies do not contain personal information from which you can be identified, unless you have furnished such information to the website. Londinium uses *session cookies* i.e. cookies which only last for the duration of your visit to the website and are deleted when you close your browser. These temporary session cookies used by us are required to facilitate your use of our website.

Londinium also uses *Google Analytics*, a web analytics service provided by Google, Inc. (“Google”), to gather statistics on our website. We will use the information gathered to improve the services to our website users. Google Analytics employs cookies to identify user sessions, which allows for the collection of important data about how users are using the site. Google Analytics uses only first-party cookies for data analysis. This means that the cookies are linked to our website domain(s), and we will only use that cookie data for statistical analysis related to your browsing behaviour on our website to help us increase the usability and accessibility of our website.

You can opt-out from being tracked by Google Analytics by downloading and installing Google Analytics Opt-out Browser Add-on for your current web browser: [Google Analytics Opt-out Browser Add-on](#).

Londinium will make no attempt to identify individual visitors, or to associate the technical details listed above with any individual. It is the policy of Londinium never to disclose such technical information in respect of individual website visitors to any third party (apart from our Internet service provider, which records such data on our behalf and which is bound by confidentiality provisions in this regard), unless obliged to disclose such information by law.

The technical information will be used only by Londinium, and only for statistical purposes to help us increase the usability and accessibility of our website. You should note that technical details, which we cannot associate with any identifiable individual, do not constitute “personal data” for the purposes of the General Data Protection Regulation and all relevant applicable legislation.

Please note that any external links to other websites are clearly identifiable as such and we are not responsible for the content or privacy practices of other websites.

## **5. WHO DO WE PASS YOUR PERSONAL INFORMATION TO**

Your personal data may be disclosed, if necessary, to the following entities:

- Regulatory bodies, law enforcement agencies and other public bodies to whom we are obliged by law to disclose the data;
- Anyone providing a service to us (software contractors, professional advisers) or acting as our agents, on the understanding that they will keep the data confidential;
- Counterparties to transactions executed on behalf of clients;
- The Revenue Commissioners, any other party to whom you have agreed we may disclose your data and any other party deemed necessary by Londinium in the normal course of business.

## **6. INTERNATIONAL TRANSFERS**

Your personal information is processed and stored within the EU. However, as the Company has dismissed its internal in-house server and has opted to rely on a cloud-based service provider (*Dropbox Inc.*, an American company) to store data, please be informed that we also do pass personal information securely to such service provider for administration and legitimate business purposes. Passing your personal information to certain countries, including USA, is allowed under an adequacy decision made by the European Commission (the EU-U.S. and Swiss-U.S. Privacy Shield framework).

You may at any time request a copy of any personal information we hold relating to you.

## **7. HOW LONG DO WE KEEP YOUR PERSONAL INFORMATION FOR?**

We keep and use your personal information for as long as you have a relationship with the Company. We might also hold it after this period of time where we need to for complaints handling, legal claims, for system back-ups and for as long as we have to under the relevant regulations (in any case for no longer than necessary for the purpose it was collected).

## **8. YOUR RIGHTS IN RELATION TO PERSONAL INFORMATION**

You have a number of rights over your personal information which you can exercise free of charge by contacting us using the details in section 9 of this *Privacy Notice*. You will need to give us information to help us identify you and we will respond to you within one month in line with regulation. Any restrictions to your rights will be explained in our response.

### **a) Right to Information**

You have a right to the information set out in this *Privacy Notice*. The most recent version of our *Privacy Notice* will always be accessible on our website at [www.londinium.ie](http://www.londinium.ie). If we make any changes to the type of personal information we collect and / or how we use it, we will inform you of the changes. We have controls in place to protect your personal information and minimize the risk of security breaches. However, should any breaches result in a high risk for you, we will inform you without undue delay.

**b) Right to Restrict or Object**

You can restrict or object to any unfair and unlawful collection or use of your personal information. You can object to any automated decision making that has a legal or similar significant impact for you and ask for the decision to be made by a person. You can withdraw consent and object to, for example direct marketing.

**c) Right to Correct and Update**

You can ask us to correct and update personal information we hold about you.

**d) Right to Delete and Be Forgotten**

You can have your personal information deleted if it is incorrect, if it is no longer needed or has been processed unfairly or unlawfully. If you have withdrawn consent you can ask for your personal information to be deleted. We will keep a record of your request, so we know why your personal information was deleted. If we have provided a regulated product or service to you, we must keep your personal information for a minimum period provided by law.

**e) Right to Portability**

You can ask for a copy of all personal information that you gave us (including through your interactions with us), and which we hold in an automated format. You can receive this in a machine-readable format that allows you to keep it. You may also request us to send this personal information in a machine-readable format to another company. The format will depend on our ability to provide this in a secure way that protects your personal information. It is unlikely we will be able to use a copy of your personal information sent to us in this way. This is because we can only collect personal information that we need. We also need your most up to date personal information for underwriting and to comply with regulations.

**f) Right to Access**

You have the right to know what personal information we hold about you and to receive a copy of your personal information. We must tell you:

- why we hold it;
- who we pass it to, including whether we transfer it outside the EU;
- how long we keep it for;
- where we got it from; and
- if we carried out any automated-decisions, and if so, the logic behind it and what it means for you.

This right does not allow you to access personal information about anyone else. To access your personal information please write to us using the contact details in section 9 of this *Privacy Notice*. To help us respond as quickly as possible please let us know if you are only looking for copies of specific personal information.

## 9. HOW TO CONTACT US

You can contact us with any questions about your personal information and this *Privacy Notice* at the following address:

Londinium DAC (Designated Activity Company)  
Pepper Canister House, Mount Street Crescent  
Dublin 2, Ireland

+353.1.9072900 [www.londinium.ie](http://www.londinium.ie)

As Londinium has not appointed a designated Data Protection Officer, you can address any query to the Compliance Officer of the Company by sending an email to:

[londiniumcompliance@londinium.ie](mailto:londiniumcompliance@londinium.ie)

Londinium reserves the right in its sole discretion to amend this *Privacy Notice* at any time, and you should regularly check this website for any amendments.

## DISCLAIMER

Londinium, its directors, employees, agents, affiliates or other representatives and their respective parent and associated companies, shall not be liable in respect of any claims, emergencies, demands, causes of action, damages, losses, expenses, including without limitation, reasonable legal fees and costs of proceedings arising out of, or in connection with, the use and/or dissemination of personal information relating to you in accordance with this 'Privacy and Cookies Statement' and your consents.

You should be aware that, where you link to another website from Londinium's website, Londinium has no control over that other website. Londinium has no responsibility for the privacy practices of other websites.