



Privacy Notice

1 ABOUT THIS NOTICE

This notice (the “**Privacy Notice**”) provides information about how H2O Asset Management LLP (“**H2O**”, “**we**”, “**us**”, “**our**”) gathers and uses personal data. We are committed to respecting the confidentiality of the personal data you supply to us and all data will be processed in accordance with the European Data Protection Regulation of 27th April 2016 (Regulation (EU) 2016/679)(the “**GDPR**”) and other data privacy laws.

2 ABOUT H2O AM LLP

We are H2O Asset Management LLP (company number OC356207), registered at 10 Old Burlington Street, London W1S 3AG. We are authorised and regulated by the Financial Conduct Authority.

Depending on our relationship with you, we are deemed a ‘data controller’ and/or a ‘data processor’ of the personal data we process. As a controller or processor of personal data, we are subject to obligations under the GDPR as detailed in this Privacy Notice.

3 CONTACT

If you have any questions or concerns regarding the contents of this Privacy Notice, the processing of personal data, or regarding the personal data we hold about you, you can contact us through the details below:

By Mail: Attention to: *H2O Compliance*, H2O AM LLP, 2nd Floor, 10 Old Burlington Street, London, W1S 3AG

By e-mail: compliance@h2o-am.com

H2O AM LLP is authorised and regulated by the Financial Conduct Authority.
Business Office: H2O AM LLP, 2nd floor, 10 Old Burlington Street, London W1S 3AG.
Company Number OC356207.

4 INFORMATION WE COLLECT

By lawful and fair means, we collect your personal information directly from you or indirectly from third parties, and through your use of our website.

4.1 PERSONAL INFORMATION WE HOLD

In the course of your use of our website and otherwise in your interaction and correspondence with H2O and its representatives, we will collect the personal information outlined below:

- *Information about you:* name, age, gender, title, date of birth and nationality.

We need this information to help us identify you, but also to allow us to contact you, for example, for regulatory or service reporting reasons.

- *Government identifiers:* identification document information (driving licence, passport) and National Insurance Number.
- *Contact information:* email, address, postcode and phone number.
- *Online information:* cookies and IP address, if you use our website.
- *Financial information:* bank account details for any payments you make to us or we make to you.
- *Audio or video recordings:* voice and video recording when you contact us. Calls may be recorded for regulatory purposes, such as calls relating to the reception, transmission and execution of investment orders.
- *Contractual information:* details about our/your products and benefits.
- *Third party information:* where relevant, we will have information such as the executor or power of attorney connected to your investment.

In some circumstances, the collection of your personal data is optional. In the event you need clarification on why your personal data is being collected and how it will be useful to us, you can contact us to confirm that you are happy for us to collect this personal data.

5 HOW WE USE YOUR PERSONAL DATA

The information and personal data we collect and what we use it for will depend on the nature of our relationship with you.

5.1 GENERAL USES OF INFORMATION

Depending on the type of relationship, we have different processing activities which may be carried out by us directly or trusted third party companies that we use. The ways in which we use your information are outlined below:

- To provide our services and fulfil our contractual obligations towards you.
- To fulfil our contractual obligations to third parties to whom you have provided your information.
- For internal business administration and record keeping purposes.
- For legal and regulatory compliance purposes. This includes responses to governmental, regulatory or law enforcement agency requests as required.
- For recruitment.
- To verify your identity and prevent fraud.
- To keep you updated regarding our services and to manage our relationship.

6 OUR LEGAL GROUNDS FOR USING YOUR PERSONAL DATA

We are entitled to use your personal data in the ways set out in this Privacy Notice on the following bases:

- The use of personal data is necessary for the performance of contractual obligations;
- We have legal obligations that we have to discharge;
- The use of personal data is necessary for our legitimate interests in:
 - Ensuring the quality of the products and services we provide;
 - Collecting information for marketing purposes;

- Communicating with you;
 - The physical security of our premises; and
 - Statistical analysis;
- You have consented to such use;
 - To establish, exercise or defend our legal rights for the purpose of legal proceedings.

If you choose not to provide personal data which is necessary to enter into a contract with us or is a legal or contractual requirement, then we may not be able to perform all of the tasks necessary to provide certain products or services to you.

Special categories of personal data (including health, racial or ethnicity data, opinions, religious or philosophical beliefs, or sexual orientation data) will only be processed by us with your explicit consent or otherwise where it is necessary for the establishment, exercise or defence of legal claims.

If you choose to provide your consent, you can withdraw it at anytime by contacting us.

7 SHARING YOUR PERSONAL DATA

H2O employees will use your personal data for the purposes mentioned above. The employees that access your personal data do so on a 'need to know' basis.

We will not disclose your personal data to third parties except for those detailed below:

- Our service providers and agents;
- Our professional advisers (auditors and legal advisers);
- Identity authentication and fraud prevention agencies;
- Relevant and applicable regulators (i.e HMRC, FCA etc);
- Your financial adviser(s) (with your authority);
- Companies you ask us to share your information with.

8 STORAGE AND SECURITY

8.1 RETENTION OF DATA

Your personal data will be retained by H2O for as long as necessary depending on the purpose for which it was provided. For details on personal data retention periods please contact us.

Our retention periods are based on a number of factors, including but not limited to:

- Contractual and business obligations;
- Legal and regulatory compliance obligations;
- Relevant statute of limitations law(s);
- Guidelines issued by supervisory bodies.

8.2 SECURITY AND CONFIDENTIALITY

The personal data that you provide us may be confidential. We will maintain the confidentiality of and protect your data in accordance with our normal procedures and all applicable laws and regulations.

We employ appropriate security measures to protect your personal data against loss and to prevent access by unauthorised persons. We employ procedures to deal with any suspected data security breach and we will notify you and any applicable regulator of a suspected breach when we are required to do so.

All persons that access or use your personal data on our instructions do so under a strict duty of confidentiality. H2O employees that access your personal data do so on a 'need to know' basis. All others who do not require the use of your personal data will not have the requisite access privileges.

9 YOUR RIGHTS

Your rights in relation to your personal data are detailed below. In order to exercise any of your rights, the easiest way is to contact our Data Protection Office through the contact details provided. We will respond to you within 30 days of your request and in most cases, there is no charge for exercising any of your rights.

- *Accessing your personal data:* you have the right to find out what personal data we hold about you.

- *Correcting or adding to your personal data:* if any of your personal data is incorrect, inaccurate or incomplete, you can ask to correct or add to the data we hold about you.
- *Data portability:* in certain circumstances, you can request for your personal data to be sent to you or to another organisation electronically.
- *Objecting to the use of your personal data for legitimate interest:* you have the right to object to any processing done under legitimate interest. We will re-assess the balance between our interests and yours, considering your particular circumstances. If we have a compelling reason we may still continue to use your data.
- *Restricting the use of your personal data:* you have the right to restrict our use of your data if you are uncertain about the accuracy or the way we use your data. We will only use your personal data after the query has been resolved.
- *Right to erasure:* you have the right to request the erasure of your personal data. In certain circumstances, we may not be able to erase all of your data for legal or regulatory reasons.

10 CHANGES TO OUR PRIVACY NOTICE

We reserve the right, at our discretion, to change, modify, add to, or remove portions from our Privacy Notice. You will be duly notified of any significant changes by way of our website.