



# Privacy Notice

How we protect and manage  
your Personal Data

## Introduction

The purpose of this Privacy Notice is to explain how Private Capital Advisors Limited ("PCA" "we", "us" or "our") collect and use personal information in connection with our business. "Personal information" means information about a living individual who can be identified from that information (either by itself or when it is combined with other information). We may update our Privacy Notice from time to time, by communicating changes to you and publishing the updated Privacy Notice on our website. We would encourage you to visit our website regularly to stay informed of the purposes for which we process your information and your rights to control how we process it.

## The information we process

Depending on the services you have ordered, or you are interested in, we collect and process different kinds of personal data. We will limit the collection and processing of information to information necessary to achieve one or more legitimate purposes as identified in this notice. Personal information may include:

1. basic personal information, including name and address, date of birth, KYC documents (including a copy of your national identity card or passport), phone number and contact details;
2. financial information, including account and transactional information and history;
3. information about your family, lifestyle and social circumstances (such as dependents, marital status);
4. information about your financial circumstances, including personal wealth, assets and liabilities, proof of income, liabilities, taxes, revenues, earnings and investments (including your investment objectives); and
5. education and employment information;
6. goods and services provided;
7. tax domicile and other tax-related documents and Information
8. professional information about you, such as your job title and work experience;
9. your knowledge of and experience in investment matters;
10. any records of phone calls between you and PCA
11. where applicable, details of your nomination of a mandate;
12. identifiers we assign to you, such as your client or account number, including for accounting purposes;

In some cases, we collect this information from public registers (which, depending on the product or service you receive, may include beneficial ownership and other registers), public administration or other third-party sources, such as wealth screening services, credit reference agencies and fraud prevention agencies.

Where permitted by law, we may process information about criminal convictions or offences and alleged offences for specific and limited activities and purposes, such as to perform checks to prevent and detect crime and to comply with laws relating to money laundering, fraud, terrorist financing, bribery and corruption, and international sanctions. It may involve investigating and gathering intelligence on suspected financial crimes, fraud and threats and sharing data with law enforcement and regulatory bodies.

## How we obtain Information

Your information is made up of all the financial and personal information we collect and hold about you and beneficial owners of your business and your transactions. It includes:

1. information you give to us including, for example, information provided by filling in forms or communicating with us whether face- to-face, by phone, letter, email or other forms of electronic communication;
2. Information you give us on application forms;
3. Information we get from how you use your accounts;
4. Details of who supplies goods and services to you;
5. Information from other organisations, such as credit reference and fraud prevention agencies;
6. Information from people who know you, such as joint account holders and people you are financially linked to; and
7. Information that other people (such as your advisors) give us during reviews and interviews, as well as information we get from analysing your transactions
8. information we receive from third parties including, for example, organisation(s) where you are the beneficial owner, third parties acting with your authority (your agents), third parties who provide services to you or us, and credit reference, fraud prevention or government agencies
9. information we learn about you through our relationship with you and the way you operate your accounts and/or services;
10. information we gather from publicly available sources, such as the press, the electoral register, company registers and online search engines

Once you have given us your consent you can withdraw it at any time, unless there is another legal reason under Data Protection Laws that allows us to process your information. Please note that if you withdraw your consent, we might not be able to provide you with specific services or products. You can withdraw your consent at any time by getting in touch with us using the contact details at the end of this notice.

## Your rights

You have a number of rights under the Data Protection Laws in relation to the way we process your personal data, which are set out below. If you wish to exercise any of these rights, or if you have any queries about how we use your personal information which are not answered here, please contact us on the following email address: [angelos@privatecapitaladvisors.co.uk](mailto:angelos@privatecapitaladvisors.co.uk) or by post at:

Private Capital Advisors Ltd.  
2nd Floor, 2 London Wall Buildings  
London EC2M 5PP

We will aim to respond to any request received from you in relation to exercising your rights within one month from your request, although this may be extended in some circumstances in line with Data Protection Laws.

<b>Rectification</b>  You have a right to request that inaccurate personal information be rectified, and incomplete personal information updated.	If you believe that any of the information we hold about you is inaccurate, you have a right to request that we restrict the processing of that information and to rectify the inaccurate personal information. Please note that if you ask us to restrict the processing of your information, we may have to suspend the operation of your account and/or the products and services we provide to you
<b>Access</b> You have a right to access the personal information we hold about you via a subject access request	<p>You have the right to access the information that we, as a firm, are processing about you and to be told where the information comes from and what we use it for. You also have the right to be informed about how long we store your information and about those with whom we share your information. Your right of access may, however, be restricted by law, the need to protect another individual's privacy or consideration for the firm's commercial business strategies and operations.</p> <p>If you would like a copy of the personal information we hold about you, please send an email to: <a href="mailto:angelos@privatecapitaladvisors.co.uk">angelos@privatecapitaladvisors.co.uk</a>, or contact us by post at:</p> <p>Private Capital Advisors Ltd 2nd Floor, 2 London Wall Buildings EC2M 5PP London</p> <p>For more information on how to access your information and the documents we need you to submit to request access, please speak to your relationship manager.</p>

<b>Restriction</b>  You have a right to ask us to restrict the processing of your personal information.	<p>You may ask us to restrict the processing of your personal information if you believe that:</p> <ol style="list-style-type: none"> <li>1. any of the information we hold about you is inaccurate;</li> <li>2. we no longer need to process your information for the purposes it was provided for, but you require the information to establish, exercise or defend legal claims; or</li> <li>3. we are not using your information in a lawful manner.</li> </ol> <p>Please note that if you ask us to restrict the processing of your information, we may have to suspend the operation of your account and/or the products and services we provide to you</p>
<b>Erase</b>  You have a right to request that we delete your personal information.	<p>You may request that we delete your personal information if:</p> <ol style="list-style-type: none"> <li>1. you believe we no longer need to process your information for the purposes it was provided for;</li> <li>2. we have requested your permission to process your personal information and you wish to withdraw your consent; or</li> <li>3. you believe we are not using your information in a lawful manner.</li> </ol>
<b>Portability</b>  You have a right to data portability.	<p>Where we have requested your permission to process your personal information or you have provided us with information for the purposes of entering into a contract with us, you have a right to receive, in a portable format, the personal information you provided to us. You may also ask us to provide it directly to a third party, if technically feasible. We are not responsible for such third party's use of your account information, which will be governed by such third party's agreement with you and any privacy statement it provides to you.</p> <p>If you would like to ask for the personal information you provided to us to be sent to you in a portable format, please send an email to: <a href="mailto:angelos@privatecapitaladvisors.co.uk">angelos@privatecapitaladvisors.co.uk</a> or contact us by post at:</p> <p>Private Capital Advisors Ltd.</p>

	2nd Floor, 2 London Wall Buildings London EC2M 5PP
<b>Objection</b>  You have a right to object to the processing of your personal information.	You have a right to object to us processing your personal information and to ask us to restrict processing, unless we can demonstrate compelling and legitimate grounds for the processing, which may override your own interests or where we need to process your information to investigate and protect us or others from legal claims.  Please note that if you object to us processing your information, we may have to suspend the operation of your account and/or the products and services we provide to you
<b>Marketing</b>  You have a right to object to direct marketing.	You have a right to object, at any time, to the processing of your personal information for direct marketing purposes, including profiling you for the purposes of direct marketing.  Through our marketing programme, we will identify and tell you about products and services supplied by us or other chosen organisations that we consider may be of interest to you. We may do this by phone, mail, email, text or through other digital media where you have given us your consent to being marketed by these methods. You can decide how much direct marketing you want to accept. You do not have to accept the products or services we offer. You can tell us in writing at any time if you do not want to receive marketing information.
<b>Withdraw and consent</b>  You have a right to withdraw your consent.	Where we rely on your permission to process your personal information, you have a right to withdraw your consent at any time. We will always make it clear where we need your permission to undertake specific processing activities.

### How to make a complaint

If you wish to raise a complaint about how we have handled your personal information, you can contact us at: [angelos@privatecapitaladvisors.co.uk](mailto:angelos@privatecapitaladvisors.co.uk) or by post to: Private Capital Advisors Ltd., 2nd Floor, 2 London Wall Buildings, London EC2M 5PP who will investigate the matter. We hope that we can address any concerns you may have, but you have the right to complain directly to the Information Commissioner's Office (UK Data protection authority). You can contact them by writing to the:

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow Cheshire  
SK9 5AF

### Changes to the way we use your information

From time to time we may change the way we use your information. Where we believe you may not reasonably expect such a change we will notify you and will allow a period of at least 30 days for you to raise any objections before the change is made.

### How we use and share your information with Global Investment Strategy UK Limited

We will only use and share your information where it is necessary for us to lawfully carry out our business activities. Your information may be shared with and processed by Global Investment Strategy UK Ltd., our Principal firm. Global Investment Strategy Ltd is a private limited company, registered in England and Wales. PCA is an appointed representative of Global Investment Strategy which is authorised and regulated by the FCA.

### Sharing with third parties

We will not share your information with anyone outside of Private Capital Advisors Ltd. except:

1. where we have your (or your agent's) express or implied permission;
2. where required for your product or service;
3. where we are required to by law or by law enforcement agencies, judicial bodies, government entities, tax authorities or regulatory bodies around the world;
4. with third parties providing services to us, such as market analysis and benchmarking, correspondent banking, and agents and sub- contractors acting on our behalf, such as the companies which print any account statements;
5. with other firms to help trace funds where you are a victim of suspected financial crime and you have agreed for us to do so, or where we suspect funds have entered your account as a result of a financial crime;
6. with credit reference and fraud prevention agencies;
7. with third party guarantors or other companies that provide you with benefits or services (such as insurance cover) associated with your product or service;
8. where required for a proposed sale, reorganisation, transfer, financial arrangement, asset disposal or other transaction relating to our business and/or assets held by our business;
9. in anonymised form as part of statistics or other aggregated data shared with third parties; or

10. To meet our duties to regulators, we may allow authorised people to see our records (which may include information about you) for reporting, compliance and auditing purposes. For the same reason, we will also hold the information about you when you are no longer a customer.

### **Transferring information overseas**

We may transfer your information to organisations in other countries provided that the organisation to whom we pass it protects it in the same way we would and in accordance with applicable regulations which shall include Financial Conduct Authority ("FCA") and Prudential Regulation Authority ("PRA") Rules, the rules of any other relevant regulatory authority or exchange and any applicable laws, rules, procedures, guidance, codes, standards and regulations (including, without limitation, accounting rules and anti-money laundering and sanctions legislation) in force from time to time ("Applicable Regulations").

In the event that we transfer information to countries outside of the EEA (which consists of countries in the European Union as well as Iceland, Liechtenstein and Norway), we will only do so where:

1. the European Commission has decided that the country or the organisation we are sharing your information with will protect your information adequately; or
2. the transfer has been authorised by a relevant data protection authority; or
3. we have entered into a contract with the organisation with which we are sharing your information (on terms approved by the European Commission) to ensure your information is adequately protected.

If you would like more information generally about transfers of information outside of the EEA, please contact us at: [angelos@privatecapitaladvisors.co.uk](mailto:angelos@privatecapitaladvisors.co.uk) or by post to: Private Capital Advisors Ltd., 2nd Floor, 2 London Wall Buildings, London EC2M 5PP.

### **Communication about your account**

If you are a customer of ours or act on behalf of a customer of ours, we will contact you with information relevant to the operation and maintenance of your account or the account of our customer with whom you are associated (including updated information about how we process your personal information), by a variety of means including post and/or telephone or other electronic communication approved by our communications policy. If you change your contact details at any point in the future, you should tell us promptly about those changes.

Electronic communications and telephone conversations between us and you may be monitored and/ or recorded for training purposes, internal investigations, to check

instructions, for legal reasons or to meet Applicable Regulations. Those recordings may be used by us in evidence in the event of a dispute with you or our customer with whom you are associated. A copy of the recordings of such conversations and communications between us and you will be available to you upon request for a period of five years and in some cases, where requested by the FCA or another relevant regulatory authority, for a period of up to seven years.

### **Fraud prevention agencies**

We may access and use information from fraud prevention agencies at the start of our relationship with a customer and periodically to:

1. prevent criminal activity, fraud and money laundering;
2. check the identity of the customer and its representatives and owners and verify the accuracy of the information you provide to us;

If false or inaccurate information is provided and/or fraud is identified or suspected, details will be passed to fraud prevention agencies. Law enforcement agencies and other organisations may access and use this information.

If we, or a fraud prevention agency, determine that you pose a fraud or money laundering risk, we may refuse to provide the services and financing you have requested, or we may stop providing existing services to you.

A record of any fraud or money laundering risk will be retained by the fraud prevention agencies, and may result in others refusing to provide services, financing or employment to you. Fraud prevention agencies can hold your information for different periods of time, and if you are considered to pose a fraud or money laundering risk, your data can be held for up to six years. When fraud prevention agencies process your information, they do so on the basis that they have a legitimate interest in preventing fraud and money laundering, to verify identity and in order to protect their business and/or to comply with laws that apply to them.

### **Our legal basis for using your personal information**

We only use your personal information where that is permitted by the laws that protect your privacy rights. We only use personal information where:

1. we have your consent (if consent is needed);
2. we need to use the information to comply with our legal obligations;
3. we need to use the information to perform a contract with you; and/or
4. it is fair to use the personal information either in our interests or someone else's interests, where there is no disadvantage to you – this can include where it is in our interests to contact you about products or services, market to you, or collaborate with others to improve our services.

Where we have your consent, you have the right to withdraw it. We will let you know how to do that at the time we gather your consent.

Special protection is given to certain kinds of personal information that is particularly sensitive. This is information about your health status, racial or ethnic origin, political views, religious or similar beliefs, sex life or sexual orientation, genetic or biometric identifiers, trade union membership or criminal convictions or allegations. We will only use this kind of personal information where:

1. we have a legal obligation to do so (for example to protect vulnerable people);
2. it is necessary for us to do so to protect your vital interests (for example if you have a severe and immediate medical need whilst on our premises);
3. it is in the substantial public interest;
4. it is necessary for the prevention or detection of crime;
5. it is necessary for insurance purposes; or
6. you have specifically given us explicit consent to use the information.

#### **How long we keep your information**

By providing you with products or services, we create records that contain your information, such as customer account records, and activity records. Records can be held on a variety of media (physical or electronic) and in different formats. We manage our records to help us to serve our customers well (for example for operational reasons, such as dealing with any queries relating to your account) and to comply with legal and regulatory requirements. Records help us demonstrate that we are meeting our responsibilities and serve as evidence of our business activities.

Retention periods for records are determined based on the type of record, the nature of the activity, product or service and Applicable Regulations. We normally keep customer account records for a defined period after your relationship with Private Capital Advisors Ltd ends. Retention periods may be changed from time to time based on business or legal and regulatory requirements. We may, on exception, retain your information for longer periods, particularly where we need to withhold destruction or disposal based on an order from the courts or an investigation by law enforcement agencies or our regulators.

#### **Security**

Private Capital Advisors Ltd. takes your privacy seriously and takes every reasonable measure and precaution to protect and secure your personal data. We work hard to protect you and your information from unauthorized access, alteration, disclosure or destruction and have several layers of security measures in place. Data is held in the United Kingdom using different (multiple) cloud-based servers. Private Capital Advisors Ltd. does not store personal data outside the EEA.

***This privacy notice was updated in May 2018. We reserve the right to amend it from time to time. If the notice has been updated, we will take steps to inform you of the update by appropriate means, depending on how we normally communicate with you, such as through your periodic statement.***