

Privacy Notice

This document details how we will treat your personal data.

Seneca Partners Limited, its subsidiaries and other Seneca branded companies under our management (including but not limited to Seneca Property, Seneca Banking Consultants, Seneca Bridging and Seneca Capital) will hold any personal information provided to us in confidence and in accordance with The General Data Protection Regulation (GDPR) (EU) 2016/679 (a regulation in EU law on data protection and privacy for all individuals within the European Union) and other applicable data protection legislation.

For the avoidance of doubt, any reference within this policy to “Seneca”, “Seneca Partners” or “Seneca Partners Limited” should be construed as collectively meaning any Seneca company under our management (subsidiaries and branded companies all included).

What is personal data?

Personal data is any information relating to an identifiable person, who can be directly or indirectly identified by reference to such data. Such information includes, name, email address, mailing address.

Seneca Partners Limited will ensure the lawful processing of your personal data.

Below we will explain;

- the types of information we collect about you;
- how we collect and use it;
- who we might share it with;
- the steps we’ll take to make sure it stays private and secure; and
- your rights to your information.

More information

If you have any questions on this policy you can give us a call on 01942 271746 and ask for Compliance. Email us on compliance@senecapartners.co.uk or write to the address below and we will reply.

Who we are

Under GDPR Seneca Partners Limited is the data controller and processor for of personal data for the purposes of investment business. The data controller is responsible for deciding how your information is used and ensuring it is private and secure.

The information we collect

We collect information about you from different places including:

- directly from you;



- from a third party acting on your behalf e.g. a financial adviser, intermediary or broker;
- from publicly available sources; and
- from other organisations.

We'll only collect your information in line with relevant regulations and law and this may relate to any of our products or services you apply for, currently hold or have held in the past.

You're responsible for making sure you give us accurate and up to date information. If you provide information for another person on your account, you'll need to tell them how to find the Privacy Notice and make sure they agree to us using their information for the purposes set out in it.

How we'll use your information

We'll use it to provide any products and services you've requested as well as other purposes, for example:

- to confirm your identity and address;
- to understand how you use your accounts;
- to carry out your instructions;
- to help us make fraud and money laundering checks;
- to improve our products and services; and
- to offer you other services we believe may benefit you unless you ask us not to.

We'll only use your information where we're allowed to by law e.g. carrying out an agreement we have with you, fulfilling a legal obligation, because we have a legitimate business interest or where you agree to it.

Who we can share your information with

We may share your information with any subcontractors, agents, or service providers who work for us. We may also share your information with others outside of Seneca Partners Limited e.g. Seneca branded companies, regulators, insurers, brokers and agents, as well as credit reference and fraud prevention agencies.

If you have consented to receive information via any of our websites then it's important you are aware that you are accepting that all Seneca companies may contact you from time to time regarding their investment services, including Seneca Partners Limited (and its subsidiaries) and other Seneca companies (including but not limited to, Seneca Property, Seneca Investment Managers, Seneca Banking Consultants and Seneca Bridging) regarding their products and services.

How long we'll keep your information

We'll keep your information for as long as you have a relationship with us. After the relationship ends, we'll keep it where we may need it for our legitimate purposes e.g. to help us respond to queries or complaints, or for other reasons e.g. fighting fraud and financial crime, and responding to requests from regulators.

Transferring your information overseas

Your information may be transferred and stored in countries outside the European Economic Area (EEA), including some that may not have laws that provide the same level of protection for personal information. When we do this, we'll ensure it has an appropriate level of protection.

Your rights

You have a number of rights relating to your information. These are detailed below:

- **Rights to access**

You can request a copy of the personal information that we hold about you. This is known as a 'Data Subject Access Request'. Seneca Partners Limited has one month to respond and our response is normally free of charge.

- **Right to rectification**

We make every effort to hold accurate data about you. Should you be aware that our information is incorrect, please inform us and we shall rectify this normally within one month.

- **Right to erasure**

You have the right to request for your personal information to be erased if we no longer have a lawful basis for processing your information.

- **Right to object**

If you do not agree we have a legitimate interest to process your personal data, you have the right to object to this processing. Any and all requests will be fully reviewed by Seneca Partners Limited and responded to with appropriate actions taken and will be sent within one month of the objection.

- **Right to complain to a supervisory authority**

If you are dissatisfied with our use or management of your personal information, you have the right to complain to an EU Data Protection Supervisory Authority. If you are dissatisfied with our use or management of your personal information in the UK, you have the right to complain to the Information Commissioner's Office (ICO) and you can contact them via their website: www.ico.org.uk.

For any more information or if you wish to complain, please contact the Compliance Officer at:

Seneca Partners Limited, 12 The Parks, Haydock, Newton-le-Willows, WA12 0JQ

Tel 01942 271746

email compliance@senecapartners.co.uk

Seneca Partners Limited, registered in England No. 07196273, is authorised and regulated by the Financial Conduct Authority. The registered office is at 12 The Parks, Haydock, Newton-le-Willows. WA12 0JQ.