

# ATLANTIC EQUITIES LLP

## Privacy Notice for Clients

### About this document

"We", "our" or "us" means **Atlantic Equities LLP** and its subsidiaries. For the purposes of data protection law, we are a data controller in respect of your personal data. We collect and use your personal data as described below. We are responsible for ensuring that we use your personal data in compliance with data protection law.

This notice applies to personal data we receive or otherwise create in connection with the provision of services to professional clients and their personnel.

It is important that you take the time to read this notice so that you understand how we will use your personal data and your rights in relation to your personal data.

### Personal data that we collect about you

We will collect and use the following information about you:

#### Information you give us

- We use the information about you that you provide to us, including the information that you provide when filling in fields in a contract (or related application) and any other information or updates to your information that you provide to us when corresponding with us (by phone, e-mail or otherwise).

#### Information we collect or generate about you

- When you submit information to us, we may use this information to interact with, and provide services to, you (or your employer), and to carry out our obligations arising under or in connection with a contract.
- We may also receive information from other sources for the above purposes.
- We may record, monitor and retain any and all communications (which may include the recording and monitoring by a third party appointed by us), including facsimile, email and other electronic messaging, telephone conversations and other electronic communications with you, for the purposes of providing services to you (or to your employer) and/or otherwise in order to comply with applicable law.
- We generate data for internal analysis and research.

If we do not receive this information we may not be able to provide certain services to you.

### How we use your personal data

Your personal data may be processed by us for the following purposes:

- to provide you with services you request (or services requested by your employer) or other services reasonably ancillary thereto, and to carry out our obligations arising under or in connection with a contract;

- to administer and maintain user access to our services;
- to communicate with you in relation to the services we provide to you (or to your employer);
- to comply with our obligations under applicable law;
- to monitor and improve our services; and/or
- for internal analysis and research.

### **Legal basis for processing your personal data**

We process your personal data pursuant to the following legal bases:

(i) where necessary to comply with a legal obligation (for example anti-money laundering, know-your-customer and counter-terrorist financing checks and the prevention and detection of fraud and other financial crime); or

(ii) where necessary for the purpose of our legitimate business interests which includes:

- the provision of services to you (or your employer), the sending and receipt of communications in relation thereto and/or carrying out obligations arising in connection with a contract;
- compliance with legal and regulatory obligations (including applicable laws, rules and regulations outside of the European Union and requests or requirements of competent authorities);
- contacting you with email updates in relation to services;
- generating data for internal analysis and research (including monitoring and improving our websites and services);
- marketing our services, including event invitations; and
- keeping a record of what individuals are interested in hearing about from us.

You have the right to object to processing under (ii) at any time by contacting us using the contact details set out below and requesting the same.

Please note that any instruction to unsubscribe from communications will not affect any processing pursuant to (i) in relation to compliance with a legal obligation.

### **Sharing your personal data**

We may disclose your personal data to our subsidiaries and to third party service providers in the circumstances described below:

- to facilitate the provision of services to you (or your employer);
- to facilitate the administration and maintenance of user access to our services;
- to conduct and/or improve our business development activities;
- to ensure the safety and security of our data (and that of third parties, including data vendors and other data sources); and
- as part of our internal research and statistical analysis activity.

We will take steps to ensure that the personal data is accessed only by personnel that have a need to do so for the purposes described in this notice.

We may also share your personal data with third parties (including, without limitation, regulatory, governmental, judicial and other bodies or authorities of competent jurisdiction) to the extent required by applicable law, for example if we are under a duty to disclose your personal data in order to comply with any legal or regulatory obligation, and to establish, exercise or defend our legal rights.

### **Transfer of personal data outside the European Economic Area**

The information you provide to us will be transferred to and stored on our secure servers in the European Economic Area (“EEA”). However, from time to time, your personal data may be transferred to, stored in, or accessed from a destination outside the EEA.

Where we transfer your personal data outside the EEA, we will ensure that it is protected in a manner that is consistent with how your personal data will be protected by us in the EEA. This can be done in a number of ways, for instance:

- the country or territory to which the transfer is made ensures an adequate level of protection for personal data;
- We and the recipient of the personal data outside the EEA have signed a form of model data protection clauses (standard contractual clauses) approved by the European Commission; or
- there exists another situation where the transfer is permitted under applicable law (for example, where we have your explicit consent to make the transfer).

You can obtain more details of the protection given to your personal data when it is transferred outside the EEA (including a copy of the standard data protection clauses which we have entered into with recipients of your personal data) by contacting us in accordance with the “Contact us” section below.

### **How long we keep your personal data**

How long we hold your personal data for will vary. The retention period will be determined by various criteria including:

- the purpose for which we are using it – we will need to keep the data for as long as is necessary for that purpose (for example, to communicate with you in respect of our services for so long as you (or your employer) remain a recipient of such services); and/or
- legal and regulatory obligations – applicable laws, rules or regulations may set a minimum period for which we have to store your personal data.

### **Your rights**

Under the General Data Protection Regulation (the "GDPR"), you have the following rights in relation to our processing of your personal data. Please note that these rights are not absolute, and we may be entitled (or required) to refuse requests where exceptions apply.

- to obtain access to, and copies of, the personal data that we hold about you;
- to require us to correct the personal data we hold about you if it is incorrect;
- to require us to erase your personal data in certain circumstances;
- to require us to restrict our data processing activities in certain circumstances;
- to object, on grounds relating to your particular situation, to any of our particular processing activities where you feel this has a disproportionate impact on you;
- to receive from us the personal data we hold about you which you have provided to us, in a reasonable format specified by you, including for the purpose of you transmitting that personal data to another data controller (including another investment firm); and
- where our processing is based on your consent, you may withdraw that consent, without affecting the lawfulness of our processing based on consent before its withdrawal.

Note: If you have given your consent and you wish to withdraw it, please contact us using the contact details as set out below. Please note that where our processing of your personal data relies on your consent and where you then withdraw that consent, we may not be able to provide all or some aspects of our services to you and/or it may affect the provision of those services.

If you are not satisfied with how we are processing your personal data, you can raise a concern with the Information Commissioner. You can also find out more about your rights under data protection legislation from the Information Commissioner's Office website available at: [www.ico.org.uk](http://www.ico.org.uk).

### **Contact us**

If you have any comments or questions about how we process your personal data, please write to Rupert Della-Porta at Atlantic Equities LLP, 25 Copthall Avenue, London EC2R 7BP, United Kingdom. Alternatively, you can contact us by email: [rdp@atlantic-equities.com](mailto:rdp@atlantic-equities.com) or by telephone: +44 (0)20 7382 2900.