



## INVESTOR PRIVACY NOTICE (AUGUST 2017)

You are receiving this Privacy Notice because you are an Investor in one or more of the funds and services of Seneca Partners Limited (**Seneca**). This Privacy Policy is also available on our website and is contained, to the extent to which it is relevant to Investors, in our Terms and Conditions.

This Privacy Notice sets out how we, Seneca, will use your personal data. Seneca is Data Controller (which has the meaning given to it in the Data Protection Legislation) of your personal data in accordance with the Data Protection Legislation, which means that it is legally responsible for safeguarding your personal data when you use our services.

### Date Protection Legislation

Data Protection Legislation means the Data Protection Act 1998, the Data Protection Directive (95/46/EC), the Electronic Communications Data Protection Directive (2002/58/EC), the Privacy and Electronic Communications (EC Directive) Regulations 2003 (SI 2426/2003) (as amended), from the date it comes into force and for the period for which it is in force, the General Data Protection Regulation (Regulation (EU) 2016/679) and all other applicable laws and regulations relating to the processing of the personal data and privacy, including where applicable the guidance and codes of practice issued by the Information Commissioner or any other national data protection authority, and the equivalent of any of the foregoing in any relevant jurisdiction that come into force from time to time.

### The Data That Seneca Collects

Depending on the status of the individual that we are collecting and processing personal data for (for example, Investor or Introducer), we may collect the following personal data:

- Name, current and previous residential addresses, e-mail address, telephone numbers, gender, marital status, family status, date and place of birth, National Insurance number, profession and professional experience, accreditations and identifying numbers (e.g. FCA number).
- Financial information and bank account details, credit history and credit score, income and other information about their financial situation including investments previously made.
- Information about attitude to risk, knowledge and experience of investing, attitude to loss and investment objectives.

### How Seneca Uses Your Personal Data

Seneca will use your personal data in order to:

- Source potential investments, conduct due diligence, monitor performance of investments and arrange appropriate exits.
- Communicate with you.
- Provide you with investment and portfolio management services.
- Send you important information regarding changes to your investments and other administrative information that we need to send from time to time.
- Send you important updates (or example, legal developments and risk management information).

- Prevent and detect crime, including fraud and money laundering.
- Improve our products and services.
- Resolve complaints and handle requests for data access, correction, blocking, erasure and destruction in accordance with the Data Protection Legislation.
- Manage our business operations, maintain internal records and comply with internal policies and procedures, including those relating to auditing, finance and accounting, billing, IT and data and records management.
- Comply with applicable laws and regulatory obligations.
- Establish and defend our legal rights.

### How Seneca Shares Your Personal Data

Seneca may share your personal data with:

- Portfolio or Fund Managers (acting as agent of Seneca) for the purposes of sourcing potential investments, conducting due diligence, monitoring performance of investments and arranging appropriate exits;
- Other Seneca companies such as subsidiaries of Seneca Partners Limited, Seneca Finance Ltd (and its subsidiaries), Seneca Secured Lending Ltd and other Seneca branded companies for the purposes of providing efficient and complete updates to you or your adviser or responding to any queries made by you or your adviser;
- Other Seneca companies such as subsidiaries of Seneca Partners Limited, Seneca Finance Ltd (and its subsidiaries), Seneca Secured Lending Ltd and other Seneca branded companies for the purposes of marketing other Seneca provided products and services, where you have agreed that we can do so;
- Brokers, intermediaries, agents, financial institutions and other businesses (including any distributor) for the purposes of credit referencing, due diligence and providing efficient and complete updates to you or your adviser or responding to any queries made by you or your adviser;
- The Share Centre Limited (or other custodian appointed from time to time and notified to the Investor in accordance with the Terms and Conditions entered into), acting as Custodian, in order for investments to be administered, safe custody services provided (including but not limited to settlement of transactions and collection of income in relation to the investments) and identity and financial standing verifications to be made;
- Any contractor employed by Seneca Partners Limited, Seneca Finance Ltd (and its subsidiaries) or other Seneca branded companies to provide IT services, subject to such contractor entering into appropriate data processing obligations with the relevant Seneca company in order to protect the security and integrity of such Personal Data; and
- Regulatory, governmental, judicial, law enforcement or other public authorities (including, but not limited to, courts, law enforcement authorities and the FCA), third-parties who are part of civil processes involving you and their advisors, for the purposes of handling claims and responding to third party requests in so far as this is necessary and in accordance with the Data Protection Legislation applicable from time to time.

### Data Security

Seneca takes appropriate technical and organisational measures against unauthorised or unlawful processing, accidental loss or destruction of, or damage to, your personal data. However, security of your data cannot be guaranteed. If you have reason to believe that your personal data is no longer secure with us or if you become aware of a breach with respect to your personal data, please immediately notify our Data Protection Officer.

### Changes to This Privacy Policy

This Privacy Policy may be reviewed to reflect changes in the law or our business practices. You will be notified of any changes. Changes will also be reflected on the Privacy Policy which can be found in the Supporting You section on our website.

### International transfers of Your Personal Data

Seneca may transfer your personal data to other countries, including countries outside the European Economic Area (for example, the United States). Seneca will transfer your personal data in this way only where strictly necessary.

### Retention of and changes to your data

Seneca will ensure that the personal data it processes for the above purposes is accurate and up-to-date. Seneca will retain your personal data for as long as necessary to fulfill the above purposes, or as otherwise permitted under the Data Protection Legislation.

If the personal data that Seneca processes for the above purposes becomes inaccurate or outdated, you must inform us as soon as is reasonably practicable.

### Your rights in relation to your personal data

You have the right under the Data Protection Legislation to:

- Seek access to your personal data ('subject access')
- Prevent processing likely to cause damage or distress
- Prevent processing for direct marketing
- Seek that your personal data is rectified, blocked, erased or destroyed, in certain circumstances.

Contact our Data Protection Officer for such requests, or if you have a concern about the way in which your personal data is processed by Seneca.

### Consent

By completing and signing the Terms and Conditions and using the services of Seneca, you consent to Seneca collecting and processing your personal data in the ways outlined above and as detailed in the Terms and Conditions.

### Further information and queries

Seneca Partners Limited is registered with the UK Information Commissioner's Office under registration number ZA046018. If you have any queries in relation to this privacy policy, please contact us at 12 The Parks, Haydock, WA12 0JQ or on 01942 271746.