



Privacy Policy

Delcap Asset Management Ltd (“Delcap”) commits to protecting your privacy. We therefore ensure that any information we collect from you, or to which we have access in connection with the services we provide under our contract with you, is used in accordance with this policy.

Information we collect

Information we obtain through cookies and from our website

We use cookies and analytics tools to collect information about you from our website. Examples may include:

- Details of your visits to our website and the resources that you access, including, but not limited to, traffic data, location data, weblogs and other communication data;
- Information that you voluntarily provide by filling in forms on our website, such as name, email address, telephone number and other optional information.

If you contact us for any reason, we may:

- Record and retain telephone conversations;
- Retain email conversations;
- Collect personal data you voluntarily provide during a conversation.

If you are a customer of Delcap’s, we may collect the following data, including but not limited to:

- You and your beneficiaries’ full name, contact information, birth date, citizenship, ID data, tax identification number, national insurance number, social security number, PEP status and source of wealth;
- Professional information, e.g. employment and job history, title, references;
- Financial information, e.g. financial and credit history information, bank details;
- Transaction and investment data, e.g. current and past investments, investment profile, investment preferences and invested amount, transaction details;

Most of your information is collected directly from you e.g. from forms or interviews you complete. We may also derive data as a result of combining other data sets, or infer further information as a result of our analyses.

Lawful basis for processing:

We only process personal information where we have a lawful basis for doing so, such as:



- **Contractual necessity:** This is where we have to process personal information to meet our contractual obligations. For example, if you are a customer or an employee, we would have to process your personal information to fulfil our contractual obligations.
- **Legal obligation:** This is where we have to process personal information in order to comply with the law. For example, we process and retain customer information, including telephone and electronic communications, to comply with financial regulations and European Directives.
- **User consent:** This is where you have given us explicit permission to process personal information for a given purpose. For example, if you complete one of our online forms, we would ask for your consent if we wanted to use your personal information for any other purpose. You have the right to withdraw this consent at any time. You can manage your preferences by contacting us at any time at the following email address: regulatory@delcap.com.

Why we use your personal information:

We collect personal information for any of the following reasons:

- To provide you with an accurate and effective service as described in our Client Agreement or as otherwise specifically agreed with you;
- To fulfil with our legal obligations;
- To send carefully-curated product factsheets, newsletters, offers and announcements, subject to your prior consent;
- To improve and maintain our website.

Who we share your personal information with

We disclose personal information to facilitate the running of our business or to provide specific services you have requested. Commonly, we will disclose information to:

- **Service providers:** We engage service providers who help to support our business and improve our products and services. These service providers include, for example, organisations that host our website or databases. Our service providers process your data only upon our written instruction. These providers reside in the EEA and are therefore also expected to meet their obligations under the General Data Protection Directive (EU Directive 2016/679).
- **Legal processes and successors in title:** We may also disclose your information to comply with applicable laws, court orders or other valid legal processes. We may transfer or disclose your personal information to any entity which takes over or acquires our business.



How long we retain your personal information:

If you are a customer, we retain your personal information for the duration of our Agreement. For regulatory reasons, we are often required to keep your personal information for 7 years following the termination of our Agreement.

It is sometimes necessary for us to keep your personal information for longer periods of time, for example:

- If there is a statutory requirement to retain it;
- If we require the information for legal reasons or there is a legitimate business need for us to retain it;
- To ensure we do not contact you if you have asked us not to.

Your rights:

Under data protection laws, you have rights as an individual in relation to the personal data we hold about you. These rights include among others:

- The right to object to direct marketing;
- The right to access the personal data that we process about you;
- The right to request the deletion of your personal data;
- The right to request the rectification of your personal data.

You can exercise these rights by contacting us at regulatory@delcap.com.