



St Mary's Private Wealth Privacy Policy

1. Introduction

St Mary's Private Wealth Limited with its registered office at 26-28 Victoria Parade, London, United Kingdom, SE10 9FR collects and uses certain Personal Data. SMPW is responsible for ensuring that it uses that Personal Data in compliance with data protection laws.

We review our privacy practices on an ongoing basis, and as such we may change this privacy policy from time to time. If such change includes any significant, material changes, we will provide clear notice of the update on the homepage of our website. Please check this policy frequently to ensure that you are familiar with its current content.

If you are an EU national and reside in the EU, or are non-EU national residing in the EU, the data controller (as defined under EU data protection law) will be St Mary's Private Wealth Limited.

2. The types of personal data we collect

Many of the services offered by SMPW require us to obtain Personal Data about you in order to perform the services we have been engaged to provide. In relation to paragraph above, we will collect and process the following Personal Data about you:

Information that you provide to SMPW. This includes information about you that you provide to us. The nature of the services you are requesting will determine the kind of Personal Data we might ask for, though such information may include (by way of a non-exhaustive list):

- basic Personal Data (such as first name; family name; job title/position in the relevant company; company name; personal/company email address; personal/business phone number; home/business address; city; postcode; country);
- any information that you choose to share on SMPW websites which may be considered Personal Data.
- Information we obtain from other sources.



3. How and why may we process your personal data

This statement explains how and why we use the personal data we collect about you when you become our customer. We will keep records about you while you are a customer and after our relationship ends where we are required to do so. For ongoing review and improvement of the information provided on SMPW Websites to ensure they are user friendly and to prevent any potential disruptions or cyber-attacks; to assess your application for SMPW Services, where applicable;

- to communicate with you in order to provide you with services or information about SMPW and SMPW Services;
- in order to comply with and in order to assess compliance with applicable laws, rules and regulations, and internal policies and procedures; or

However we use Personal Data we make sure that the usage complies with law and the law allows us and requires us to use Personal Data for a variety of reasons. These include:

- we need to do so in order to perform our contractual obligations with our customers;
- we have obtained your consent;
- we have legal and regulatory obligations that we have to discharge;
- we may need to do so in order to establish, exercise or defend our legal rights or for the purpose of legal proceedings;

We will take steps to ensure that the Personal Data is accessed only by personnel of SMPW that have a need to do so for the purposes described in this Privacy Policy.

4. Disclosure of your information to third parties

We may also share your Personal Data outside of the company for the following purposes:

- with our business partners. For example, this could include our partners who provide you or your company or your organisation with services alongside or related to, those provided by SMPW. Personal Data will only be transferred to a business partner who is contractually obliged to comply with appropriate data protection obligations and the relevant privacy and confidentiality legislation;



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- with third party agents and contractors for the purposes of providing services to us. These third parties will be subject to appropriate data protection obligations and they will only use your Personal Data as described in this Privacy Policy;
 - to the extent required by law, for example if we are under a duty to disclose your Personal Data in order to comply with any legal obligation (including, without limitation, in order to comply with tax reporting requirements and disclosures to regulators), or to establish, exercise or defend our legal rights;
 - if we sell our business or assets, in which case we may need to disclose your Personal Data to the prospective buyer for due diligence purposes; and
 - if we are acquired by a third party, in which case the Personal Data held by us about you will be disclosed to the third party buyer.

5. How we safeguard your personal data

5.1 We have extensive controls in place to maintain the security of our information and information systems. Client files are protected with safeguards according to the sensitivity of the relevant information. Appropriate controls (such as restricted access) are placed on our computer systems. Physical access to areas where Personal Data is gathered, processed or stored is limited to authorised personnel.

5.2 As a condition of employment/engagement, SMPW personnel are required to follow all applicable laws and regulations, including in relation to data protection law. Access to sensitive Personal Data is limited to those of our personnel who need to it to perform their roles. Unauthorised use or disclosure of confidential client information by SMPW personnel is prohibited and may result in disciplinary measures.

5.3 When you contact SMPW personnel about your file, you may be asked for some Personal Data. This type of safeguard is designed to ensure that only you, or someone authorised by you, has access to your file.

6. How long we keep your personal data

How long we will hold your Personal Data for will vary and will be determined by the following criteria:

- the purpose for which we are using it – SMPW will need to keep the data for as long as is necessary for that purpose; and
- legal obligations – laws or regulation may set a minimum period for which we have to keep your Personal Data.



7. Your rights

Your Right to a Copy of Your Personal Data

Under the Data Protection Act you have a right to obtain a copy of the personal data that we hold about you and/or that St Mary's Private Wealth Limited holds about you. If you believe any information held about you is incorrect or incomplete please contact us so we can update our records.

Your Right to withdraw Your Consent

Under the Data Protection Act, you have the right to withdraw your consent at any time. Requests for personal data and withdrawal of consent should be addressed directly to Data Protection Officer below:

Data Protection Officer

St Mary's Private Wealth Limited

26-28 Victoria Parade, London, United Kingdom, SE10 9FR

10. Contact us

If you would like additional information on anything in or related to this privacy policy, or you would like to exercise any rights that you may have in relation to your personal data, please contact St Mary's Private Limited registered office using the following contact information:

Address: 26-28 Victoria Parade, London, SE10 9FR

Email Address: info@spwinvestment.com