

## Meltemi Investment Management Limited

### Privacy Notice for Clients

#### About this document

Meltemi Investment Management Limited (a company registered in England and Wales with registration number **04696452** having its registered office at 28 Ives Street, London, England, SW3 2ND (referred to in this document as "**Meltemi**", "**we**", "**our**" or "**us**") is the data controller of your personal data and is subject to, with effect from 25 May 2018, the General Data Protection Regulation (the "**GDPR**") and any applicable UK Data Protection Act ("**DPA**").

This privacy notice explains why and how Meltemi processes the personal data of our clients and prospective clients ("**you**" or "**your**").

This privacy notice was updated on 22 May 2018 and supersedes any previous notice or terms provided by, or on behalf of, Meltemi in connection with how we process your personal data.

#### How we collect your personal data

We collect your personal data in various ways, principally:

- from information you provide to us when you interact with us before becoming a client, for example when you contact us to request information about our services and when you provide us with indicative information about your investment objectives, so that we may provide you with a proposal;
- when you ask us to provide services to you and provide us with your personal data in application forms for investment management services and in accompanying identification documents;
- from third parties who are mandated to instruct us on your behalf, such as Bank Julius Baer or other banks, or your agents, representatives, intermediaries, brokers, advisers or custodians of your assets;
- from publicly available sources, for example when we carry out due diligence checks on you before we can accept you as a client; and
- in other ways as you interact with us during your time as our client, for example when you meet with us or when we exchange formal correspondence and other communications with you.

#### The categories of personal data we collect

We collect the following types of personal data about you:

- Biographical and contact information, including your name, date of birth, nationality and contact information such as address, email address and telephone number;



- Identification and due diligence information, including your passport information, proof of address, national insurance number (or other tax identification number) and due diligence information such as the results of anti-money laundering and 'know your client' background checks; and
- Financial and wealth related information, including bank account details and information relating to your financial situation such as your assets, net worth, income, source of wealth and your investment objectives.
- We may also collect special categories of personal data, including more sensitive personal data, such as information concerning your health or medical conditions ("**sensitive personal data**") as well as data relating to criminal convictions and offences, where relevant for the purposes set out below.

### The legal grounds and purposes for processing your personal data

We may process your personal data because it is **necessary for the performance of a contract** with you or in order to take steps at your request prior to entering into a contract namely, our investment management agreement / terms of business. In this respect, we may use your personal data:

- to interact with you before you become our client, for example when you express your interest in our services (for example, to send you a proposal or answer enquiries about our services);
- once you have engaged us and become our client, to provide you with the services as set out in our Investment Management Agreement or Terms of Business;
- for the purposes of helping the custodian bank process payments and transfers, and for distributing financial statements, notices and performance reports;
- corresponding and interacting with you or others acting on your behalf about your services and including to deal with any concerns or feedback you may have; and
- maintaining records of your transactions.

We may also process your personal data for our **compliance and our legal obligations**. In this respect, we may use your personal data:

- to confirm your identity and carry out due diligence checks, including to confirm your source of wealth for anti-money laundering and 'know your client' purposes;
- to meet our other compliance and regulatory obligations, including in order to comply with any requirement of any applicable statute, regulation or regulatory rule to which we are subject.

We may also process your personal data because it is necessary for our or a third party's **legitimate interests**. Our "legitimate interests" include our commercial interests in operating our business in a client focused, efficient and sustainable manner, in accordance with all applicable legal and regulatory requirements. In this respect, we may use your personal data:

- outsourcing selected 'back office' functions to third parties (for example, suppliers of hosted software solutions or cloud storage providers) for the purposes of efficient, fast and secure access to data;

- to conduct compliance activities such as audit and reporting, assessing and managing risk, fraud and anti-money laundering (AML) prevention and measures relating to sanctions, anti-terrorism laws and regulations and fighting financial crime. This includes know your customer (KYC) screening, politically exposed persons (PEPs) screening against internal and external databases, to establish connections to PEPs and sanctions screening;
- for transaction reporting to our regulators;
- to monitor and evaluate the performance and effectiveness of our services; and
- for our marketing purposes, including in order to keep you informed (by letter, telephone, and email) of our investment approach and strategies or events which may be of interest to you.

*Note:* If you do not wish to receive such marketing information, please let us know now or at any time in the future, and your details will be removed from our mailing list(s).

We may also process your personal data where:

- it is necessary for reasons of **substantial public interest** (for example, where the due diligence checks we carry out involve our processing data relating to criminal convictions and offences and we do not ask your consent because to do so might lead to a 'tipping off' offence under anti-money laundering legislation);
- it is necessary for the **establishment, exercise or defence of legal claims** (for example, to protect and defend our rights or property, and/or the rights or property of our clients, or of third parties); and
- we have your specific or, where necessary, explicit **consent** to do so (for example, where we process sensitive personal data concerning your health or medical conditions for the purpose of making adjustments when we meet with you).

### Monitoring of communications

As a matter of course, Meltemi records and monitors the use of the firm's communications equipment by its staff with clients. This means that when you speak with your investment manager (or another member of our staff) by telephone, your calls may be recorded and/or monitored. In the same way, the content of email communications may be monitored for the following purposes:

- in pursuit of our legal obligations or in compliance with regulatory rules or requirements;
- as evidence of your instructions and to ensure that we are providing a high quality service to you;
- for training purposes, allowing us to improve the quality of our communications with you;
- for the establishment, exercise or defence of disputes or legal claims (where relevant); and
- for preventing or detecting crime (including fraud).

### When your personal data may be shared with others

In order to provide our services to you, we may disclose your personal data:

- to our affiliated entities overseas when required to assist us in providing the services;



- to your custodian bank/s who will need to provide records, facilitate buying and selling of investments and investment related activities and portfolio updates;
- to third 'data processors' we may engage to perform, or assist in the performance of, our services or to advise us, for example: agencies we engage to perform anti-money laundering checks; fund administrators when investing in a fund on your behalf; external auditors; and the providers of hosted IT software and solutions for clients' and prospective clients' personal data;
- to your agents and representatives, where they are interacting with us on your behalf (for example, brokers, custodians of your assets or tax advisers); and
- in circumstances where we are required or authorised by law (including applicable data protection laws), court order, regulatory or governmental authorities to disclose your personal data.

### **Transferring your personal data overseas**

Where relevant for your services, your personal data will be transferred to and processed outside of the European Economic Area ("EEA") in countries or territories that do not provide the same level of protection for personal data as the EEA does. Where this happens, we will put in place appropriate measures to ensure the adequate protection of your personal data when it is transferred outside of the EEA, as required by the DPA and, with effect from 25 May 2018, the GDPR.

You can obtain more details of the protection given to your personal data when it is transferred outside the EEA by contacting us using the details set out below.

### **How long your personal data is kept**

We will retain your personal data in soft copy and hard copy for as long as we are providing you with the services referred to in any relevant contractual document, and for as long as permitted or required for legal and regulatory purposes after the relationship between you and us has ended, or from the point your application for a particular service or services is declined or abandoned, including relevant legal limitation periods.

In particular, we will retain your personal data relating to your portfolio, fund or account for a period of seven years following the date on which you cease to invest with us, in case any claim arises in relation to the management of your portfolio, fund or account.

### **Your rights in relation to your personal data**

Under GDPR, you have the following rights:

- To obtain access to, and copies of, the personal data we hold about you or to transfer it to another data controller;
- To require us not to send you marketing communications;
- To request that we erase or correct your personal data;
- To request that we restrict our data processing activities in relation to your personal data or cease processing in certain circumstances; and

- To withdraw consent where we are relying on it to process your personal data and we do not have another valid basis to do so.

Please note that the above rights are not absolute, and we may be entitled to refuse requests where exceptions apply. You can find out more about your rights under data protection legislation at [www.ico.org.uk](http://www.ico.org.uk) and raise any concerns you have with them about how we are processing your personal data.

If you have given your consent and you wish to withdraw it, please contact us in writing 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. It may also not be possible to undo the effect of such consent, for example if your personal data has been transferred outside the EEA.

### Contact us

If you have any comments or questions about how we process your personal data, you can contact Cem Balcisoy, Meltemi's Compliance Officer, by writing to our registered office at 28 Ives Street, London, England, SW3 2ND. Alternatively, you can contact us by email [cem@meltemi.biz](mailto:cem@meltemi.biz) or [investments@meltemi.biz](mailto:investments@meltemi.biz) or by telephone +44 203 795 8144.