



Data Privacy Notice

Anavio Capital Partners LLP, (the “**Firm**”) is a company registered in England and Wales with company number OC396549. The Firm is authorised and regulated by the Financial Conduct Authority (the “**FCA**”) with Firm Reference Number 659611.

For the purposes of the General Data Protection Regulation (“**GDPR**”), the Firm will be the “**Controller**” of the personal data you provide. Please read the following information carefully in order to understand the Firm’s practices in relation to the treatment of your personal data. Should you have any questions, please email us at GDPR@anaviocap.com.

What data privacy principles does the Firm adhere to?

- The Firm will process all personal data in a lawfully, fair and transparent manner.
- The Firm will only collect personal data where it is necessary
 - For the Firm to provide a service to you;
 - For you to provide a service to the Firm;
 - For the Firm to keep you informed of its products and services; or
 - For the Firm to comply with its legal and regulatory obligations.
- The personal data collected by the Firm will be adequate, relevant and limited to what is necessary in relation to the specific purpose for which your data will be processed.
- The Firm will take all reasonable steps to ensure that personal data is accurate and, where necessary, kept up-to-date.
- The Firm will maintain personal data in a form that permits identification no longer than is necessary for the purposes for which the personal data has been collected for processing, in accordance with the Firm’s record retention requirements as mandated by the FCA.
- The Firm will hold and process personal data in a manner that ensures appropriate security.
- The Firm will only share personal data where it is necessary to provide the agreed service or where it is necessary for the Firm to comply with its legal and regulatory requirements.
- The Firm will only utilise a service provider based outside of the EEA for the processing of personal data where this is strictly necessary to facilitate our services to you. In all cases, we will ensure service providers are fully compliant with GDPR ahead of transferring any personal data.

What personal data does the Firm collect and why?

In the course of providing products/services to you, the Firm may collect information that is considered personal information (e.g. name, contact details, address, passport number, driving licence).

As a client, contact or employee of the Firm, we will require some personal information in order to verify your identity and have the applicable relationship with you. Some of this information may be required to satisfy legal obligations (e.g. to comply with obligations arising under the money laundering regulations whereas other information may be required in connection with the provision of services to you). The information collected will vary depending on the service the Firm provides to you or you provide to the Firm, but typically includes:

- Personal information: Such as your name, date of birth, passport number or national insurance number; and
- Contact information: Including your address, telephone number and email address.

Where does the Firm store my personal data?

The Firm has comprehensive policies and procedures in place to ensure your personal data is kept safe and secure, with these including:

- Data encryption;
- Firewalls;
- Intrusion detection;
- 24/7 physical protection of the facilities where your data is stored (i.e. Microsoft's UK data centres);
- Background checks for personnel that access physical facilities; and
- Security procedures across all service operations.

How long does the Firm retain personal data?

As a regulated entity, the Firm is required to maintain its books and records for a prescribed period (5 years from either the ceasing of a business relationship, or, in the case of non-clients, from the making of a record – or alternatively, for 7 years, where specifically requested to do so by the FCA or any other regulator with jurisdiction over the Firm). As such, information that falls in scope of either of these requirements is retained in line with the mandated timeframe.

Any information that is outside the scope of this requirement will be retained whilst relevant and useful, and destroyed where this ceases to be the case or where the data subject specifically requests this.

How have I been categorised in accordance with GDPR?

The GDPR requires the Firm to inform you of the legal basis on which we maintain your personal data. Typically, the Firm will reach out to you personally to confirm this; however, as a general rule the following is applicable:

- Clients – Information is maintained on the basis of contractual obligation and/or legitimate interests (where relevant);
- Service providers – Information is maintained based on contractual obligations; and
- Database/marketing contacts – Information is maintained on the basis of legitimate interests.

What are my rights?

Once you have provided your personal data to the Firm, you have certain rights which apply, depending on your relationship with the Firm, the information you have shared with us and the Firm's legal and regulatory obligations.

- You have the right to request a copy of the information that we hold about you. If you would like a copy of some, or all, of your personal information, please email the Firm at GDPR@anaviocap.com. The Firm will provide this information to you within one month (with the ability to extend this by an additional two months where necessary), free of charge.
- You have the right to request that the information the Firm holds about you is erased under certain circumstances including where there is no additional legal and/or regulatory requirement for the Firm to retain this information.
- As a client, you have the right to request that any information the Firm holds about you be provided to another company in a commonly used and machine-readable format, otherwise known as 'data portability'.
- You have the right to ensure that your personal information is accurate and up to date, or where necessary rectified. Where you feel that your personal data is incorrect or inaccurate and should therefore be updated, please contact GDPR@anaviocap.com
- You have the right to object to your information being processed, for example for direct marketing purposes.
- You have the right to restrict the processing of your information, for example limiting the material that you receive or where your information is transferred.
- You have the right to object to any decisions based on the automated processing of your personal data, including profiling.
- You have the right to lodge a complaint with the Information Commissioner's Office if you feel that we have not processed your data in accordance with GDPR, any contractual agreements or this Privacy Notice.

Who should I direct questions to?

If you have any questions, concerns or complaints about the practices contained within this document or how the Firm has handled your data, please email: GDPR@anaviocap.com. Alternatively, you may write to: Anavio Capital Partners LLP, 11a Regent Street, London, SW1Y 4LR.

You also have the right to make a complaint in respect of the Firm to the Information Commissioner's Office in the United Kingdom.

Will I be notified of changes to this policy?

The Firm may review and update this Privacy Notice from time to time. If the Firm needs to make any material changes to how it collects, uses or shares your personal data it will inform you of these changes by our usual communication channels, including by email.