



Privacy Notice

Prusik Investment Management LLP (“**Prusik**”) is a partnership registered in England and Wales with registered partnership number OC312327. Prusik is authorised and regulated by the Financial Conduct Authority (“FCA”) with Firm Reference Number 431813. In this notice, the terms “**we**”, “**our**” and “**us**” refer to Prusik.

About this privacy notice

This privacy notice sets out the basis on which Prusik will use personal data, and applies to you if you are:

- (a) a client,
- (b) included on our marketing database to receive promotional and other marketing materials,
- (c) a service provider that is an individual or an employee of one of our service providers.

We are a data controller in respect of your personal data for the purposes of data protection law, such as the European Union’s General Data Protection Regulation (“**GDPR**”), and we are responsible for ensuring that we use your personal data in compliance with data protection law. 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:

enquiries@prusikim.com

We appoint certain service providers who will process your personal data on our behalf. They will generally process the data in accordance with our instructions.

What data privacy principles does Prusik adhere to?

Prusik adheres to the following principles in relation to personal data for which we are a data controller:

- We will process all personal data in a lawfully, fair and transparent manner;
- We will only collect personal data where it is necessary:
 - to provide a service or product to you;
 - to keep you informed of our products and services;
 - to comply with our legal and regulatory obligations; and/or
 - for you or your employer to provide a service to us.

- The personal data we collect will be adequate, relevant and limited to what is necessary in relation to the specific purpose for which your data will be processed;
- We will take all reasonable steps to ensure that personal data is accurate and up-to-date;
- We maintain personal data in a form that permits you to be identified for no longer than necessary and in accordance with FCA record retention requirements;
- We will hold and process personal data in a manner that ensures appropriate security;
- We will only share personal data where it is necessary to provide the agreed service or to comply with our legal and regulatory requirements.

What personal data does Prusik collect and why?

We may collect personal data about you that is considered personal information (for example, your name and address, contact details, date of birth, gender, nationality, signature, national insurance number and copies of identity documents such as your passport and driving licence).

The type of personal data we shall hold will depend on our relationship. For example, we may need personal data in connection with our provision of services to you, to verify your identity in order to maintain our relationship with you, and to satisfy our legal and regulatory obligations (such as those arising under money laundering regulations).

We can process your personal data for the following reasons:

- (a) clients – in order for us to perform a contract to which you are a party (or carry out steps beforehand at your request), to comply with relevant legal or regulatory obligations to which we are subject and/or to pursue our legitimate business interests;
- (b) marketing database contacts – in order for us to pursue our legitimate business interests; and
- (c) relevant service providers or employees of service providers– in order for us to pursue our legitimate business interests.

We will tell you beforehand if we intend to process data for any purpose other than that for which we have obtained the personal data (as explained in this privacy notice).

Where does Prusik store my personal data?

We have comprehensive policies and procedures in place to ensure your personal data is kept safe and secure. These include:

- Data encryption;
- Firewalls;
- Intrusion detection;
- Physical protection of the facilities where your data is stored;
- Background checks for personnel that access storage facilities; and
- Security procedures across all service operations.

Transfers of your personal data outside the European Economic Area

Your personal data may be transferred to and stored by persons outside the European Economic Area (the “EEA”), and in particular may be transferred to and stored by our affiliates or service providers outside the EEA.

We will only use a service provider based outside of the EEA where this is strictly necessary to facilitate our services to you. Where personal data is transferred outside the EEA, we will ensure that the transfer is subject to appropriate safeguards or is otherwise permitted under applicable law.

How long does Prusik retain personal data?

As a regulated entity, we are required to maintain our books and records for a prescribed period (five 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 seven years, where specifically requested to do so by the FCA). As such, personal data that falls in scope of either of these requirements is retained in line with the mandated timeframe.

Personal data may be held for longer than the above requirements if this is otherwise deemed necessary, relevant and/or useful. Such personal data will be destroyed if these circumstances change or if you specifically request us to do so (subject to any obligation that prevents us from destroying your personal data).

What are your rights?

You have certain rights over any personal data that you provide to us, which will depend upon your relationship with us, the information you have provided and our legal and regulatory obligations:

- You have the right to request a copy of the personal data that we hold about you. If you want a copy of any or all of your personal data, please email us at enquiries@prusikim.com, and we will provide this to you free of charge within one month (with the ability to extend this by an additional two months where necessary).
- You have the right to request that the personal data that we hold about you is erased under certain circumstances (in particular this may apply if we have no legal and/or regulatory requirement to continue to retain this).
- As a client, you have the right to request that any personal data we hold 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 data is accurate and up-to-date, or that it be rectified where necessary. Where your personal data is incorrect or inaccurate and should therefore be updated, please contact mark.dwerryhouse@prusikim.com
- You have the right to object to your personal data being processed, for example for direct marketing purposes.
- You have the right to restrict the processing of your personal data, for example limiting the material that you receive or where your personal data may be transferred to.
- 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.

Will I be notified of changes to this policy?

We may, from time to time, review and update this policy. We will maintain the latest version of this policy on our website (<http://www.prusikim.co.uk/>), and where changes are deemed material we will make you aware of these.

Who should I direct questions to?

If you have any questions, concerns or complaints about the practices contained within this document or how we have handled your data, please email: mark.dwerryhouse@prusikim.com
Alternatively, you may write to: Prusik Investment Management LLP, 6th floor, Moss House, 15-16 Brook's Mews, London W1k 4DS.