

## **Contents**

### **1 Introduction**

- 1.1 Purpose
- 1.2 Interpretation

### **2 The notice**

- 2.1 What personal data we collect
- 2.2 How we collect your personal data
- 2.3 Why we process your personal data
- 2.4 Legal bases for processing your personal data
- 2.5 Sharing
- 2.6 Transfers
- 2.7 Retention
- 2.8 Cookies
- 2.9 Security
- 2.10 Your rights

### **3 Contact**

## 1 Introduction

### 1.1 Purpose

This privacy policy document explains what Brompton Asset Management does with your personal data when we are communicating with you remotely or in person, receiving a service from you, working with you in the provision of services to our clients or you are visiting our website, in accordance with Brompton's obligations under applicable data protection laws (**DP laws**). Please note that this document will be reviewed periodically and when necessary. In the event of changes, an updated version will be included on our website, noting the date that it was amended.

If you are client of Brompton Asset Management's discretionary investment management service, there is a separate privacy notice covering the personal data we collect to provide our service to you. This is available on our website or you can request a copy by contacting us on [privacy@bromptonam.com](mailto:privacy@bromptonam.com).

If you are an employee or director of Brompton, there is a separate privacy notice covering the personal data we collect to fulfil our contractual and legal obligations to you.

### 1.2 Interpretation

In this notice, we use definitions from the GDPR unless otherwise stated.

**Controller** means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data.

The **UK General Data Protection Regulation (UK GDPR)** is the UK's retention of the European Union's **General Data Protection Regulation (GDPR)** in UK law. The UK GDPR sits alongside the **Data Protection Act 2018 (DPA 2018)**. The DPA 2018 enacts the GDPR into UK law.

**Personal data** is any information relating to an identified or identifiable natural person, namely someone who can be identified, directly or indirectly from that information alone or in conjunction with other information 'in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person'.

**Processing** means 'any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction'.

**Processor** means a natural or legal person, public authority, agency or other body that processes personal data on behalf of the controller.

**Transfers** are transfers of personal data either to third countries outside the EU or international organisations. These are organisations and their subordinate bodies governed by public international law or any other body set up by, or on the basis of, an agreement between two or more countries.

## **2 The notice**

Brompton is committed to complying with DP laws in the processing of personal data by or on behalf of Brompton.

### *2.1 What personal data we collect*

We collect a range of personal data for our legitimate business purposes and in accordance with DP laws, depending on the nature of the relationship between Brompton and yourself, including:

- contact details such as name, address, email and phone number;
- the nature of your role, job title, organisation where our relationship involves the provision of services;
- other data you or your organisation chooses to share with us, which if you are a supplier, may include financial information; and
- certain information we may automatically collect about you when you visit our website whether or not you decide to use our services. This includes your IP address, the dates and the times and frequency with which you access the website and the way you browse its content. We will also collect data from you when you contact us via the website.

Please also note the following:

- any email sent or received from the Brompton domains is retained for at least seven years in line with regulatory requirements;
- calls to and from Brompton, including in some cases calls from mobile phones, may be recorded and monitored, with recordings retained for at least five years; and
- if you visit our offices and use our guest WiFi, please note that Brompton reserves the right to monitor your usage. Brompton will not accept any responsibility for any individual identified as having breached the current or future copyright laws and reserves the right to pass on individuals' contact information to the appropriate authorities if requested.

### *2.2 How we collect personal data*

We would collect data as follows:

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**GENERAL PRIVACY NOTICE**

- when you provide information to us such as when you contact us, or we contact you, via email, telephone or any other means;
- in the ordinary course of our relationship with you such as during meetings and other discussions; and
- from third parties that provide data to us such as your employer, our clients, other service providers etc., including from websites of such third parties.

We may also collect personal data you manifestly choose to make public, including via social media and on your or your employer's website.

When you visit our website, we collect data automatically via cookies in line with cookie settings in your browser. If you wish to find out more about cookies, including how we use them and what choices are available to you, please see below.

### *2.3 Why we process your personal data*

We use this information for our legitimate business interests, including:

- to administer and manage delivery of our services and products to you or to our clients;
- to send you requested product or service information;
- to respond to queries and customer service requests or concerns;
- to market to you, for example by sending you email newsletters;
- to improve our websites and marketing efforts;
- to comply with our legal obligations; and
- to operate our business.

### *2.4 Legal bases for processing your personal data*

There are three main legal bases on which we process your personal data:

- the processing is necessary to perform our contract with you or your organisation;
- the processing is necessary to fulfil our legal obligations; and
- the processing is necessary for our legitimate interests. In this case, our legitimate interests must not override your interests or fundamental rights and freedoms.

Where we do seek to rely on legitimate interest:

- the purpose of the processing must be legitimate;
- the method or specific technology must be necessary for our legitimate interests; and
- the processing must be proportionate to the business needs or purpose and implemented in the least intrusive manner possible.

In some circumstances, we may request your consent to use your personal data. Typically this will be in relation to providing you with marketing material. You

may withdraw this consent and chose to stop receiving such materials by emailing us at [privacy@bromptonam.com](mailto:privacy@bromptonam.com).

## **2.5** *Sharing*

We share your personal data with third parties to the extent necessary for the relevant purpose, including without limitation:

- other entities within the Brompton group;
- employees, partners and representatives of Brompton for the purposes of the normal operation of our business;
- third parties and service providers with whom we operate where this is necessary for the normal operation of our business;
- parties with whom we are in negotiations for any sale or purchase of a business unit; and
- to comply with any legal obligation such as complying with a court or other legally-binding order or decision by a competent authority.

Where we do share your personal data, we will ensure appropriate measures are in place to safeguard your personal data.

## **2.6** *Transfers*

We will share your information with third parties and service providers including operators of our IT infrastructure. If it is processed within a country covered by the UK's 'adequacy regulations', such as the European Economic Area (EEA), your information will be protected by the same data protection standards as those to which we are subject.

Where we transfer your information to countries not covered by UK adequacy regulations, we take appropriate measures to ensure that:

- such transfers are in accordance with data protection laws; and
- appropriate safeguards are in place to protect your personal data.

## **2.7** *Retention*

We are committed to retaining your personal information only for as long as is needed to fulfil the purpose or purposes for which it was collected and for as long as we are required or permitted to keep it by law.

We will process your data throughout our business interactions and will retain this information for an appropriate amount of time after such interactions cease. The period of retention will depend on the type of data, our legitimate business needs and other legal or regulatory rules that may require us to retain this data for a minimum period. There may also be legal, regulatory or risk-management requirements to retain data, including where relevant to any potential litigation.

Where we process personal data solely with your consent, we process the personal data until you ask us to stop and for a reasonable period afterwards to allow us to comply with your request.

Where we no longer need to hold your personal data, we will take appropriate steps to delete or remove your personal information from our system.

## **2.8 Cookies**

We use cookies, which are small text files transferred to your browser by our website, to help with two aspects of your visit:

- to allow our site to remember your preferences such as whether you accept our terms of use; and
- to help with web analytics, the anonymous measurement of website visits so we and our agents can analyse which content and functionality are popular and useful and how our site is performing. The software we use for web analytics is provided by Google.

We do not use cookies that provide information to advertising networks or any third parties that might be tracking your activity across multiple sites.

If you use our website without disabling cookies, we will assume you are happy to receive them for the two purposes outlined above.

Please note some parts of our sites will not function when all cookies are disabled. If you have questions on our use of cookies, please email [privacy@bromptonam.com](mailto:privacy@bromptonam.com).

## **2.9 Security**

We take protection of your personal data seriously as we do with the protection of all personal data we process. We implement appropriate technical and organisational measures to ensure a level of appropriate security.

## **2.10 Your rights**

You have certain rights under DP laws. In particular, you have the right to:

- know if Brompton is processing your personal data and, subject to certain conditions, to access a copy of the information;
- have any errors rectified;
- request the erasure of the data;
- restrict the processing or object to the processing of the data;
- object to automated decision-making including profiling; and
- request, where applicable, the transfer of your data to another person.

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Where you have provided consent, for example for us to send you marketing literature, you have the right to withdraw such consent and to object to processing of your personal data for direct marketing.

We do not, at the date of this document, make any decisions based automated processing on or carry out such profiling. If we intend to in future, we will provide you with advance notice as required by DP laws, including the GDPR.

To exercise any of your rights or to learn more, please email [privacy@bromptonam.com](mailto:privacy@bromptonam.com).

You have the right to complain to the Information Commissioner's Office, which enforces data protection laws. Its website is <https://ico.org.uk>.

### **3 Contact**

If you have any questions about this notice or require additional information about our privacy policy, please contact us at [privacy@bromptonam.com](mailto:privacy@bromptonam.com).

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**GENERAL PRIVACY NOTICE**

**Version Control**

Version #	Date	Updated by	Description
2.0	September 23	Rebecca Fodder	Minor refresh and amends for the UK GDPR
3.0	May 2025	Chessy Smith	Minor changes