



London & Oxford Group

LONDON AND OXFORD CAPITAL MARKETS LIMITED (TRADING NAME LONDON AND OXFORD GROUP) PRIVACY NOTICE

1. OUR CONTACT DETAILS

We are the controller of your personal data and any individuals who are connected to your business. For all enquiries regarding personal data, you and any individuals who are connected to your business should write to us at:

London and Oxford Capital Markets Limited

5th Floor, 4 Moorgate

London EC2R 6DA

Attention: Richard Tan, Head of Legal and Compliance

Telephone: +44 (0)20 3746 5800

Email: richard.tan@londonandoxford.com

2. THE TYPE OF PERSONAL INFORMATION WE COLLECT

Set out below are some examples of personal information we currently collect and process:

- (a) Your personal particulars, such as name, contact details, date and place of birth, and education details.
- (b) Your contact details, such as residential and email address, landline and mobile numbers.
- (c) Information concerning identity, such as biometric and identity card, passport details and driving licence.
- (d) Your specimen signature(s).
- (e) Your financial details, such as your source of wealth, income, expenses, and credit history.
- (f) Your employment details, such as occupation, directorships and other positions held, employment history, salary, and/or benefits.
- (g) Your tax information and national insurance number.
- (h) Information included in customer documentation (including, without limitation) about your risk profile, investments, investment objectives, knowledge and experience and/or business interests and assets.
- (i) Information we use to identify and authenticate you and the individuals connected to your business.

- (j) Investigation data, such as due diligence checks, sanctions and anti-money laundering checks, companies house searches and external intelligence reports.
- (k) Your banking information, such as account numbers and banking transactions.
- (l) Your personal opinions made known to us, such as through feedback or surveys.
- (m) Information that we need to support our regulatory obligations, such as information about transaction details, detection of any suspicious and unusual activity and information about parties connected to you or these activities.
- (n) Information relating to your activities, habits, preferences and interests arising from your use of products and services of London and Oxford Group, our partners or vendors.
- (o) Other information about you and individuals connected to your business that you have provided to us.
- (p) Other electronic data or information relating to you such as IP addresses, cookies, activity logs, online identifiers and location data through your usage of our products and services or as part of their delivery to you.

3. HOW WE GET THE PERSONAL INFORMATION AND WHY WE HAVE IT

Most of the personal information we process is provided to us directly by you for one of the following reasons:

When you establish business relationship with us, you are required to complete an account opening application form and provide us with your personal information in order for us to on-board you. As part of our customer due diligence process, we may also obtain your data from other publicly available sources.

When you visit our website, we may use cookies and other technologies to automatically collect information, such as your IP address, your login information, browser type and version, device identifier, location and time zone setting, browser plug-in types and versions, operating system and platform, page response times, and download errors; and information about your visit, including the websites you visit before and after our website and products you viewed or searched for; and the length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouseovers) and methods used to browse away from the page.

Under the UK General Data Protection Regulation (UK GDPR), the lawful bases upon which we are able to rely on for processing your information are:

- (a) Your consent. You are able to remove your consent at any time. You can do this by contacting us at the Contact details set out in Section 1 above.
- (b) We have a contractual obligation.
- (c) We have a legal obligation.
- (d) We have a vital interest.
- (e) We need it to perform a public task.

- (f) We have a legitimate interest.

Below are some reasons we use your personal information and information relating to individuals connected to your business:

- (a) Delivering our products and services to you.
- (b) Carrying out your instructions.
- (c) Managing our relationship with you.
- (d) Preventing or detecting crime including fraud and financial crime.
- (e) Providing security and business continuity.
- (f) Undertaking risk management.
- (g) Undertaking data analytics to better understand your circumstances and preferences so we can make sure we can provide you with the best advice and offer you a tailored service.
- (h) Protecting our legal rights and complying with our legal obligations.
- (i) Complying with laws and regulation that we are subject and sharing with our regulators and other authorities.

4. HOW WE STORE YOUR PERSONAL INFORMATION

Your information is securely stored. We will keep your personal information and information relating to individuals connected to your business for as long as you are our customer and in line with our data retention policy to enable us to comply with our legal and regulatory requirements or use it where we need to for our legitimate purposes such as managing your account and dealing with any disputes or concerns that may arise.

5. YOUR DATA PROTECTION RIGHTS

Under data protection law, you have rights including:

Right of access – You have the right to ask us for copies of your personal information.

Right to rectification – You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

Right to erasure – You have the right to ask us to erase your personal information in certain circumstances.

Right to restriction of processing – You have the right to ask us to restrict the processing of your personal information in certain circumstances.

Right to object to processing – You have the the right to object to the processing of your personal information in certain circumstances.

Right to data portability – You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

Please contact us at the Contact Details set out in Section 1 above if you wish to make a request.

6. HOW TO COMPLAIN

If you have any concerns about our use of your personal information, you can make a complaint to us at the Contact Details set out in Section 1 above. You can also complain to the ICO if you are unhappy with how we have used your data.

The ICO's address is:
Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire SK9 5AF

Helpline number: 0303 123 1113
ICO website: <https://www.ico.org.uk>