



## **Data Privacy Policy**

### **Who we are**

We, Campion Capital Limited, company registration No. 04921914 (Campion), are committed to protecting and respecting your privacy.

This Privacy Notice explains in detail the types of personal data we may collect about you when you interact with us. It also explains how we'll store and handle that data and keep it safe.

For the purpose of the General Data Protection Regulation 2018 (GDPR), Campion is both a data controller and a data processor:

- Data Controller; when managing data that we ourselves collect and store within our systems. For example, business customer and supplier information held within our CRM and employee information held within our HR system.
- Data Processor; when analysing data that our customers provide to us during the normal course of business.

Our Data Protection Officer (DPO) is as follows:

William Maydon  
Director  
[wmaydon@campioncapital.com](mailto:wmaydon@campioncapital.com)  
T: +44 (0) 1865 355 522

### **The legal basis we rely on**

#### **Legitimate interest**

In specific situations, we require your data to pursue our legitimate interests in a way which might reasonably be expected as part of running our business and which does not materially impact your rights, freedom or interests.

For example, we might use your email address or telephone contact details to inform you of certain investment opportunities that we think might interest you.

#### **When do we collect your data?**

- Via business cards from meetings
- Contact details given over the phone
- Incoming email requests where I contact details have been gleaned from fund fact sheets
- Incoming information requests via our website
- When we collect information from publicly-available sources where you have provided your consent to share information or where the information is made public as a matter of law

**Campion Capital Ltd.**

29 Beaumont Street, Oxford OX1 2NP T: +44 (0) 1865 355 522

Authorised and regulated by the Financial Conduct Authority (# 230196)

## **What sort of personal data do we collect?**

- Your name, business email address, company address (trading and registered), your business telephone numbers (landline and mobile)
- Details of your interactions with us, through our sales team. For example, we collect notes from our conversations with you, details of any complaints or requirements

## **How and why we use your data**

We want to provide you with the best possible customer experience. One way to achieve that is to get the richest picture of your business and the way you work and your requirements.

We then use this information to not only deliver a high level of customer service but also to make you aware of investment products that we deem to be appropriate for your business/clients.

The data privacy law allows this as part of our legitimate interest in understanding our customers and providing the highest levels of service.

If at any time you wish to change how we use your data, you can contact us to either unsubscribe from any future marketing communications or request us to remove your data entirely, which we are obliged to do as part of the new data privacy law in-line with our legal and regulatory responsibilities

## **Here's how we will use your data and why**

- To email you with monthly fund fact sheets if this has been deemed appropriate
- To send fund information by post
- To contact you by telephone in order to provide fund information or to organise a meeting

**Of course, you are free to opt out of hearing from us by any of these channels at any time. If you would like to have all your details removed from our CRM system please email [dataprivacy@campioncapital.com](mailto:dataprivacy@campioncapital.com) or call us on +44 (0) 207 317 4433.**

## **How we protect your data**

We know how much data security matters to all our customers. We will treat your data with the utmost care and take all appropriate steps to protect it.

Access to your personal data is password-protected and is stored within Microsoft Dynamics, our CRM system.

We regularly monitor our system for possible vulnerabilities and attacks.

## **Who do we share your personal data with?**

- We do share your personal data with trusted third-parties.
- On rare occasions we share your contact information with the fund managers in which you have an investment
- They may only use your data for the exact purposes we specify in our contract with them

# Campion Capital

- We work closely with them to ensure that your privacy is respected and protected at all times

## **Examples of the kind of third-parties we work with**

- Technology partners who support our business systems and solutions. For example, Microsoft and Amazon Web Services
- Fund managers
- Fund administrators

## **Sharing data with third-parties for their own purposes**

- We never do this

## **Where your data may be processed**

Sometimes we will need to share your data with third-parties and suppliers outside the European Economic Area (EEA), such as Australia or the USA.

## **Protecting your data outside the EEA**

The EEA includes all EU Member countries as well as Iceland, Liechtenstein and Norway. We may transfer personal data that we collect from you to third-party data processors in countries that are outside the EEA. For example, we work with a number of fund management groups based in the United States of America and they may request a name/email address/telephone number.

If we do this, we have procedures in place to ensure your data receives the same protection as if it were being processed inside the EEA, for example our contracts with third-parties stipulate the standards they must follow at all times.

## **What are your rights with regards to your data?**

You have the right to request;

- Access to the data we hold about you, free of charge in most cases
- The correction of your data when incorrect, out of date or incomplete. For example, when you object to our use of your data on the basis of legitimate interest, or once the purpose for which we hold the data has come to an end
- That we stop using your data for direct marketing

You have a right to request a copy of any information about you that we hold at any time. To ask for your information, please contact Data Protection Officer, Campion Capital, 29 Beaumont Street, Oxford OX1 2NP or email [dataprivacy@campioncapital.com](mailto:dataprivacy@campioncapital.com)



### **Where we rely on our legitimate interest**

In cases where we are processing your data on the basis of legitimate interest, you can ask us to stop for reasons connected to your individual situation. We must then do so unless we believe we have a legitimate overriding reason to continue processing your personal data. For example, regulatory requirement.

### **Direct marketing**

You have the right to stop the use of your personal data for direct marketing activity through all channels, or selected channels. We must always comply with your request.

### **Checking your identity**

To protect the confidentiality of your information, we will ask you to verify your identity before proceeding with any request you make under this Privacy Notice. If you have authorised a third party to submit a request on your behalf, we will ask them to prove they have your permission to act.

### **How can you stop the use of your data for direct marketing?**

Simply click the 'unsubscribe' link in any email communication that we send you.

### **Contacting the Regulator**

If you feel that your data has not been handled correctly or you are unhappy with our response to any requests you have made to us regarding the use of your data, you have the right to lodge a complaint with the Information Commissioners Office (ICO).

You can call them on 0303 123 1113.

Or visit them online at [www.ico.org.uk](http://www.ico.org.uk).

If you are based outside the UK, you have the right to lodge your complaint with the relevant data protection regulator in your country of residence.

### **Any Questions?**

We hope this Privacy Notice has been helpful in setting out the way we handle your data and your rights to control it.

If you have any questions that have not been covered, please contact our Data Protection Officer who will be pleased to help you.

- Email – [dataprivacy@campioncapital.com](mailto:dataprivacy@campioncapital.com)
- Or write to us at Data Protection Officer, Campion Capital, 29 Beaumont Street, Oxford OX1 2NP



This notice was last updated on 25/04/2018

**Changes to our privacy policy**

Any changes we may make to our privacy policy in the future will be posted on our website(s) and, where appropriate, notified to you by e-mail.