

# GDPR Privacy Policy

2018

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## Privacy Notice

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This privacy notice explains how we use any personal information we collect about you and how we comply with the General Data Protection Regulations, effective from 25 May 2018.

Strawberry Invest Limited is a wholly owned subsidiary and appointed representative of P1 Investment Management Limited, together forming a Group.

## What information do we collect about you?

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We collect information about you when you register on our website and when you open a Strawberry Invest Account such as an ISA, GIA or SIPP. This information will relate to your personal and financial circumstances. We also collate details of any transactions you make on your account.

We may also collect information when you voluntarily complete client surveys or provide feedback to us.

In common with other websites, we collect information relating to usage using cookies. These are text files placed on your computer when you visit our website to collect standard internet log information and visitor behaviour information. We'll use your information collected from the website to personalise your repeat visits to the site.

## Why do we need to collect and use your personal data?

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The primary legal basis that we intend to use for the processing of your data is for the performance of our contract with you for the operation of your account. The information that we collect about you is essential for us to be able to carry out the services that you require from us effectively. When you register via our website you provide your consent for us to hold your personal data. Without collecting your personal data we'd also be unable to fulfil our legal and regulatory obligations.

We do not collect any special categories of data about you.



## How will we use the information about you?

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We collect information about you in order to provide you with the services such as account operation and administration.

## Who might we share your information with?

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We won't share your information for marketing purposes with companies outside our group. In order to deliver our services to you effectively we may send your details to third parties such

as those that we engage for professional compliance, accountancy or legal services, those who maintain our systems and data, as well as product and platform providers that we use to arrange financial products for you.

Where third parties are involved in processing your data we'll have a contract in place with them to ensure that the nature and purpose of the processing is clear, that they are subject to a duty of confidence in processing your data and that they'll only act in accordance with our written instructions.

Where it's necessary for your personal data to be forwarded to a third party we'll use appropriate security measures to protect your personal data in transit, including the use of password protection and/or encryption of data.

To fulfil our obligations in respect of prevention of money-laundering and other financial crime, we will send your details to third party agencies for identity verification purposes. More information is available on the checks required, so please contact us if you would like to know

more. We may also be required to pass your details to appropriate regulatory bodies or law enforcement agencies.

## How long do we keep hold of your information?

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In principle, your personal data shouldn't be held for longer than is required under the terms of our contract for services with you. However, we're subject to regulatory requirements to retain data for specified minimum periods. These are generally:

Five years for investment business



Indefinitely for pension transfers and opt-outs

We also reserve the right to retain data for longer than this where we believe it is in our legitimate interests to do so. In any case, we'll not retain your personal data for longer than six years past the time of your death.

You have the right to request deletion of your personal data. We'll comply with this request, subject to the restrictions of our regulatory obligations and legitimate interests as noted above.

## How can I access the information you hold about me?

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You have the right to request a copy of the information that we hold about you. If you'd like a copy of some or all of your personal information please email or write to us using the contact details noted below.

When your personal data is processed by automated means you have the right to ask us to move your personal data to another organisation for their use.

We have an obligation to ensure that your personal information is accurate and up to date. Please ask us to correct or remove any information that you think is incorrect.

## Marketing

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We'd like to send you information about our products and services and those of other companies in our group which may be of interest to you. If you've agreed to receive marketing information, you may opt out at a later date.

You have a right at any time to stop us from contacting you for marketing purposes or giving your information to other members of the group. If you no longer wish to be contacted for marketing purposes, please contact us by email or post. The details are included later in this Privacy Notice.



## Cookies

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We use cookies to track visitor use of the website and to compile statistical reports on website activity.

For further information visit <http://www.allaboutcookies.org/>

You can set your browser not to accept cookies and the above website tells you how to remove cookies from your browser. However in a few cases some of our website features may not function as a result.

## Other websites

Our website may contain links to other websites. This privacy policy only applies to our Group's website so when you link to other websites you should read their own privacy policies.

## What can you do if you are unhappy with how your personal data is processed?

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You also have a right to lodge a complaint with the supervisory authority for data protection. In the UK this is:

Information Commissioner's Office Wycliffe House  
Water Lane Wilmslow Cheshire SK9 5AF

0303 123 1113 (local rate)

## Changes to our privacy policy

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We keep our privacy policy under regular review and we'll place any updates on our website. This privacy policy was last updated on 2nd May 2018.



## How to contact us

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Please contact us if you have any questions about our privacy policy or information we hold about you:

Write to Paul White, Compliance Director at Strawberry Invest Limited, Dean Clarke House, Southernhay East, Exeter EX1 2AP.

Or by email to: [paul@strawberryinvest.com](mailto:paul@strawberryinvest.com)

Your Consent to receive details of products and services that may be of interest

From time to time we may wish to contact you to offer additional products or services which may be of interest to you. In order to do this we require your consent by agreeing to one or more of the options below:

Email

Telephone

Post

Client Name:

Client Signature:

Date:

You may withdraw this consent at any time by notifying us at our main business address or by email to the address shown in the previous section.

