

Alinor Capital Privacy Notice December 2024

(A) This Notice

Summary – This Notice

This Notice explains how we Process Personal Data. This Notice may be amended or updated from time to time.

This Notice is issued by the Controller entity listed in Section (P) below (“**Alinor Capital Management LLP**”, “**we**”, “**us**” and “**our**”) and is addressed to individuals outside our organisation with whom we interact or have been referred, including clients, individual clients of the organisations we primary interact with, other users of our services, personnel of our clients and vendors, individual business contacts, and visitors to our offices (together, “**you**”). Defined terms used in this Notice are explained in Section (Q) below.

This Notice may be amended or updated from time to time to reflect changes in our practices with respect to the Processing of Personal Data, or changes in applicable law. We encourage you to read this Notice carefully.

(B) Collection of Personal Data

Summary – Collection of Personal Data

We collect or obtain Personal Data: when those data are provided to us (e.g. where you contact us); in the course of our relationship with you (e.g. for the provision of our services); when you make Personal Data public (e.g. if you make a public post on social media). We may also receive Personal Data about you from third parties (e.g. law enforcement authorities).

Collection of Personal Data: We collect or obtain Personal Data about you from the following sources:

- Data provided to us: We obtain Personal Data when those data are provided to us or to any of our service providers acting on our behalf (e.g. provided by you, our clients, your financial adviser, your financial services provider, credit reference agencies, payment service providers, outsourced service providers, or your employer, or by way of a referral from our existing clients, or by any other means).
- Data we obtain in person: We obtain Personal Data during meetings and calls, during visits from sales or marketing representatives, or at events we attend.
- Relationship data: We collect or obtain Personal Data in the ordinary course of our relationship with you (e.g. we provide a service to you, or to your employer).
- Data you make public: We collect or obtain Personal Data that you manifestly choose to make public, including via social media (e.g. we may collect information from your social media profile(s), if you make a public post).
- Third party information: We collect or obtain Personal Data from third parties who provide it to us (e.g. credit reference agencies; law enforcement authorities; etc.).

(C) Creation of Personal Data

Summary – Creation of Personal Data

We create Personal Data about you (e.g. records of your interactions with us).

We also create Personal Data about you in certain circumstances, such as records of your interactions with us including using AI to make transcripts of calls. We may also combine Personal Data from our services, including where those data are collected from different devices or sources.

(D) Categories of Personal Data we Process

Summary – Categories of Personal Data we Process

Alinor Capital Management LLP (“Alinor Capital”) is incorporated as a limited liability partnership in England and Wales (number OC448165), with its registered office at 5th Floor East, 33 Cavendish Street, London W1G 0PW. Alinor Capital is authorised and regulated by the Financial Conduct Authority (FRN 1000103).

We Process: your personal details (e.g. your name); your contact details (e.g. your address); your professional details (e.g. information about your experience); demographic data (e.g. your age); your financial information (e.g. details of investments, transactions, and account balances); records of surveys or testing in which you have participated; visitor logs for our premises; records of your consents; payment details (e.g. your billing address; details of your employer (where relevant); and any views or opinions you provide to us.

We Process the following categories of Personal Data about you:

- Personal details: given name(s); preferred name; and photograph.
- Contact details: correspondence address; telephone number; email address; details of professional advisers, details of personal assistants, where applicable; online messaging details; and social media details.
- Correspondence: records and copies of your correspondence if you contact us.
- Professional details: records of your expertise; professional history; practising details and qualification details; information about your experience; participation in meetings, seminars, advisory boards and conferences; information about your professional relationship with other individuals or institutions; language abilities; and other professional skills.
- Demographic information: gender; date of birth / age; nationality; salutation; title; and language preferences.
- Visitor logs: records of visits to our premises.
- Consent records: records of any consents you have given, together with the date and time, means of consent, and any related information (e.g. the subject matter of the consent).
- Financial information and payment details: investment amounts; investment details; account balances; transaction details; details of debt; credit facility information; share ownership; information concerning anti-money laundering checks, conflicts checks, and credit checks; billing information; tax information; payment records; billing address; payment method; bank account number; account holder name; account security details; BACS details; SWIFT details; IBAN details; payment amount; payment date; and records of cheques.
- Employer details: where you interact with us in your capacity as an employee of a third party; and the name, address, telephone number and email address of your employer, to the extent relevant.
- Views and opinions/preferences: any views and opinions/preferences that you choose to communicate or send to us, or publicly post about us on social media platforms.

(E) Sensitive Personal Data

Summary – Sensitive Personal Data

We do not seek to collect or otherwise Process Sensitive Personal Data. Where we need to Process Sensitive Personal Data for a legitimate purpose, we do so in accordance with applicable law.

We do not seek to collect or otherwise Process Sensitive Personal Data in the ordinary course of our business. Where it becomes necessary to Process your Sensitive Personal Data for any reason, we rely on one of the following legal bases:

- Compliance with applicable law: We may Process your Sensitive Personal Data where the Processing is required or permitted by applicable law (e.g. to comply with our diversity reporting obligations);
- Detection and prevention of crime: We may Process your Sensitive Personal Data where the Processing is necessary for the detection or prevention of crime (e.g. the prevention of fraud);
- Establishment, exercise or defence of legal claims: We may Process your Sensitive Personal Data where the Processing is necessary for the establishment, exercise or defence of legal claims; or
- Consent: We may Process your Sensitive Personal Data where we have, in accordance with applicable law, obtained your express consent prior to Processing your Sensitive Personal Data (this legal basis is only used in relation to Processing that is entirely voluntary – it is not used for Processing that is necessary or obligatory in any way).

If you provide Sensitive Personal Data to us, you must ensure that it is lawful for you to disclose such data to us, and you must ensure a valid legal basis applies to the Processing of those Sensitive Personal Data.

(F) Purposes of Processing and legal bases for Processing

Summary – Purposes of Processing and legal bases for Processing
We Process Personal Data for the following purposes: providing our services to you; providing services to our clients; compliance checks; operating our business; communicating with you; financial management; conducting surveys; compliance with applicable law; improving our services; and fraud prevention.

The purposes for which we Process the categories of Personal Data identified in Section (D) above, subject to applicable law, and the legal bases on which we perform such Processing, are as follows:

Purpose of Processing	Categories of Personal Data	Legal basis for Processing
<ul style="list-style-type: none"> • <u>Provision of our services</u>: providing our services; including any steps required prior to the provision of our services, or during our analysis of financial opportunities; providing promotional items upon request; and communicating with you and/or your advisers or representatives in relation to the services. 	<ul style="list-style-type: none"> • Personal details • Contact details • Correspondence • Demographic information • Consent records • Employer details • Views and opinions 	<ul style="list-style-type: none"> • The Processing is necessary in connection with any contract that you have entered into with us, or to take steps prior to entering into a contract with us; or • We have a legitimate interest in carrying out the Processing for the purpose of providing our services (to the extent that such legitimate interest is not overridden by your interests, fundamental rights, or freedoms); or • We have obtained your prior consent to the Processing (this legal basis is only used in relation to Processing that is entirely voluntary – it is not used for Processing that is necessary or obligatory in any way).
<ul style="list-style-type: none"> • <u>Compliance checks</u>: fulfilling our Anti-Money Laundering regulatory compliance and reporting obligations; 'Know Your Client' checks; and confirming and verifying your identity; use of credit reference agencies; and screening against government and/or law enforcement agency sanctions lists and other legal restrictions. 	<ul style="list-style-type: none"> • Personal details • Contact details • Correspondence • Professional details • Consent records • Employer details 	<ul style="list-style-type: none"> • The Processing is necessary for compliance with a legal obligation; or • The Processing is necessary in connection with any contract that you have entered into with us, or to take steps prior to entering into a contract with us; or • We have a legitimate interest in carrying out the Processing for the purpose of fulfilling our regulatory and compliance obligations (to the extent that such legitimate interest is not overridden by your interests, fundamental rights, or freedoms); or • We have obtained your prior consent to the Processing (this legal basis is only used in relation to Processing that is entirely voluntary – it is not used for Processing that is necessary or obligatory in any way).
<ul style="list-style-type: none"> • <u>Operating our business</u>: operating and managing our services; providing content to you and/or your advisers or representatives; communicating and interacting with you and/or your advisers or representatives <i>via</i> our services; and notifying you and/or your advisers or representatives of changes to any of our services. 	<ul style="list-style-type: none"> • Personal details • Contact details • Correspondence • Consent records • Views and opinions • Audio recordings 	<ul style="list-style-type: none"> • The Processing is necessary in connection with any contract that you have entered into with us, or to take steps prior to entering into a contract with us; or • We have a legitimate interest in carrying out the Processing for the purpose of operating our business (to the extent that such legitimate interest is not overridden by your interests, fundamental rights, or freedoms); or • We have obtained your prior consent to the Processing (this legal basis is only used in relation to Processing that is entirely voluntary – it is not used for Processing that is necessary or obligatory in any way).

Purpose of Processing	Categories of Personal Data	Legal basis for Processing
<ul style="list-style-type: none"> • <u>Communications and marketing</u>: communicating with you and/or your advisers or representatives via any means (including via email, telephone, text message, social media, post or in person) to provide news items and other information in which you and/or your advisers or representatives may be interested, subject always to obtaining your prior opt-in consent to the extent required under applicable law; maintaining and updating your contact information where appropriate; obtaining your prior, opt-in consent where required; enabling and recording your choice to opt-out or unsubscribe, where applicable. 	<ul style="list-style-type: none"> • Personal details • Contact details • Correspondence • Survey and testing data • Demographic information • Consent records • Views and opinions 	<ul style="list-style-type: none"> • The Processing is necessary in connection with any contract that you have entered into with us, or to take steps prior to entering into a contract with us; or • We have a legitimate interest in carrying out the Processing for the purpose of contacting you and/or your advisers or representatives, subject always to compliance with applicable law (to the extent that such legitimate interest is not overridden by your interests, fundamental rights, or freedoms); or • We have obtained your prior consent to the Processing (this legal basis is only used in relation to Processing that is entirely voluntary – it is not used for Processing that is necessary or obligatory in any way).
<ul style="list-style-type: none"> • <u>Legal compliance</u>: compliance with our legal and regulatory obligations under applicable law. 	Each category of Personal Data identified in Section (D) above, to the extent necessary in the context of the relevant legal obligation or regulatory requirements or guidance.	<ul style="list-style-type: none"> • The Processing is necessary for compliance with a legal obligation, where applicable; or • We have a legitimate interest in carrying out the Processing for the purpose of compliance with regulatory requirements or guidance (to the extent that such legitimate interest is not overridden by your interests, fundamental rights, or freedoms).
<ul style="list-style-type: none"> • <u>Fraud prevention</u>: Detecting, preventing and investigating fraud. 	Each category of Personal Data identified in Section (D) above, to the extent necessary in the context of the relevant fraud detection, prevention or investigation activities.	<ul style="list-style-type: none"> • The Processing is necessary for compliance with a legal obligation (especially in respect of applicable employment law); or • We have a legitimate interest in carrying out the Processing for the purpose of detecting, and protecting against, fraud (to the extent that such legitimate interest is not overridden by your interests, fundamental rights, or freedoms).

(G) Disclosure of Personal Data to third parties

Summary – Disclosure of Personal Data to third parties
We disclose Personal Data to: legal and regulatory authorities; our external advisers; our Processors; any party as necessary in connection with legal proceedings; any party as necessary for investigating, detecting or preventing criminal offences; and any purchaser of our business.

We disclose Personal Data to the following parties, for legitimate business purposes and the operation of our services to you and/or your advisers or representatives, in accordance with applicable law:

- you and, where appropriate, your appointed advisers and/or representatives;
- accountants, auditors, consultants, lawyers and other outside professional advisers to Alinor Capital Management LLP, subject to binding contractual obligations of confidentiality;
- third party Processors (such as payment services providers; IT services providers; managed service providers, etc.), located anywhere in the world, subject to the requirements noted below in this Section (G);

- any relevant party, regulatory body, governmental authority, law enforcement agency or court, to the extent necessary for the establishment, exercise or defence of legal claims;
- any relevant party, regulatory body, governmental authority, law enforcement agency or court, for the purposes of prevention, investigation, detection or prosecution of criminal offences or the execution of criminal penalties;
- any relevant third party acquirer(s) or successor(s) in title, in the event that we sell or transfer all or any relevant portion of our business or assets (including in the event of a reorganization, dissolution or liquidation); and

If we engage a third-party Processor to Process your Personal Data, the Processor will be subject to binding contractual obligations to: (i) only Process the Personal Data in accordance with our prior written instructions; and (ii) use measures to protect the confidentiality and security of the Personal Data; together with any additional requirements under applicable law.

(H) Profiling

Summary – Profiling

Personal Data are subject to automated decision-making and Profiling.

We may Process Personal Data for the purposes of automated decision-making and Profiling, which would be carried out for the following purposes:

Profiling activity	Logic of the Profiling activity	Consequences for you
Anti-Money Laundering/Fraud	We may use an automated decision making system to evaluate, analyse and assess whether you pose a fraud or money laundering risk, and our ability to provide the services in question (prior to having entered into a contract with you).	This Profiling activity may affect whether you are deemed to pose any anti-money laundering or fraud risks and therefore whether you are able to access our services

(I) International transfer of Personal Data

Summary – International transfer of Personal Data

We transfer Personal Data to recipients in other countries. Where we transfer Personal Data from the UK to a recipient outside the UK that is not in an Adequate Jurisdiction, we do so on the basis of the UK equivalent to the Standard Contractual Clauses (i.e., the UK International Data Transfer Agreement).

We do not envisage that any data about you will be transferred by us outside the UK, however we will notify you in writing if this position changes.

In the instance that this position does change, if an exemption or derogation applies (e.g. where a transfer is necessary to establish, exercise or defend a legal claim) we may rely on that exemption or derogation, as appropriate. Where no exemption or derogation applies, and we transfer your Personal Data from the UK to recipients located outside the UK who are not in Adequate Jurisdictions, we will do so on the basis of the UK equivalent to the Standard Contractual Clauses (i.e., the International Data Transfer Agreement). You are entitled to request a copy using the contact details provided in Section (P) below.

(J) Data security

Summary – Data security

We implement appropriate technical and organisational security measures to protect your Personal Data. Please ensure that any Personal Data that you send to us are sent securely.

We have implemented appropriate technical and organisational security measures designed to protect your Personal Data against accidental or unlawful destruction, loss, alteration,

unauthorised disclosure, unauthorised access, and other unlawful or unauthorised forms of Processing, in accordance with applicable law.

Because the internet is an open system, the transmission of information *via* the internet is not completely secure. Although we will implement all reasonable measures to protect your Personal Data, we cannot guarantee the security of your data transmitted to us using the internet – any such transmission is at your own risk and you are responsible for ensuring that any Personal Data that you send to us are sent securely.

(K) Data accuracy

Summary – Data accuracy

We take every reasonable step to ensure that your Personal Data are kept accurate and up-to-date and are erased or rectified if we become aware of inaccuracies.

We take every reasonable step to ensure that:

- your Personal Data that we Process are accurate and, where necessary, kept up-to-date; and
- any of your Personal Data that we Process that are inaccurate (having regard to the purposes for which they are Processed) are erased or rectified without delay.

From time to time we may ask you to confirm the accuracy of your Personal Data.

(L) Data minimisation

Summary – Data minimisation

We take every reasonable step to limit the volume of your Personal Data that we Process to what is necessary.

We take every reasonable step to ensure that your Personal Data that we Process are limited to the Personal Data reasonably necessary in connection with the purposes set out in this Notice.

(M) Data retention

Summary – Data retention

We take every reasonable step to ensure that your Personal Data are only retained for as long as they are needed in connection with a lawful purpose.

We take every reasonable step to ensure that your Personal Data are only Processed for the minimum period necessary for the purposes set out in this Notice. The criteria for determining the duration for which we will retain your Personal Data are as follows:

- (1) we will retain Personal Data in a form that permits identification only for as long as:
 - (a) we maintain an ongoing relationship with you and/or your advisers or representatives (e.g. where you are a user of our service or you are lawfully included in our mailing list and have not unsubscribed); or
 - (b) your Personal Data are necessary in connection with the lawful purposes set out in this Notice, for which we have a valid legal basis (e.g. where your Personal Data are included in a contract between us and your employer, your advisers or representatives, and we have a legitimate interest in Processing those Personal Data for the purposes of operating our business and fulfilling our obligations under that contract; or where we have a legal obligation to retain your Personal Data),

plus:

- (2) the duration of:
 - (a) any applicable limitation period under applicable law (i.e. any period during which any person could bring a legal claim against us in connection with your Personal Data, or to which your Personal Data are relevant); and

- (b) an additional two (2) month period following the end of such applicable limitation period (so that, if a person brings a claim at the end of the limitation period, we are still afforded a reasonable amount of time in which to identify any Personal Data that are relevant to that claim),

and:

- (3) in addition, if any relevant legal claims are brought, we continue to Process Personal Data for such additional periods as are necessary in connection with that claim.

During the periods noted in paragraphs (2)(a) and (2)(b) above, we will restrict our Processing of your Personal Data to storage of, and maintaining the security of, those data, except to the extent that those data need to be reviewed in connection with any legal claim, or any obligation under applicable law.

Once the periods in paragraphs (1), (2) and (3) above, each to the extent applicable, have concluded, we will either:

- permanently delete or destroy the relevant Personal Data; or
- anonymize the relevant Personal Data.

(N) Your legal rights

Summary – Your legal rights

Subject to applicable law, you may have a number of rights, including: the right not to provide your Personal Data to us; the right of access to your Personal Data; the right to request rectification of inaccuracies; the right to request the erasure, or restriction of Processing, of your Personal Data; the right to object to the Processing of your Personal Data; the right to have your Personal Data transferred to another Controller; the right to withdraw consent; and the right to lodge complaints with Data Protection Authorities. In some cases it will be necessary to provide evidence of your identity before we can give effect to these rights.

Subject to applicable law, you may have the following rights regarding the Processing of your Relevant Personal Data:

- the right not to provide your Personal Data to us (however, please note that we will be unable to provide you with the full benefit of our services, if you do not provide us with your Personal Data – e.g. we might not be able to process your requests without the necessary details);
- the right to request access to, or copies of, your Relevant Personal Data, together with information regarding the nature, Processing and disclosure of those Relevant Personal Data;
- the right to request rectification of any inaccuracies in your Relevant Personal Data;
- the right to request, on legitimate grounds:
 - erasure of your Relevant Personal Data; or
 - restriction of Processing of your Relevant Personal Data;
- the right to have certain Relevant Personal Data transferred to another Controller, in a structured, commonly used and machine-readable format, to the extent applicable;
- where we Process your Relevant Personal Data on the basis of your consent, the right to withdraw that consent (noting that such withdrawal does not affect the lawfulness of any Processing performed prior to the date on which we receive notice of such withdrawal, and does not prevent the Processing of your Personal Data in reliance upon any other available legal bases); and
- the right to lodge complaints regarding the Processing of your Relevant Personal Data with a Data Protection Authority (i.e., the Information Commissioner's Office (<https://ico.org.uk/>)).

Subject to applicable law, you may also have the following additional rights regarding the Processing of your Relevant Personal Data:

- the right to object, on grounds relating to your particular situation, to the Processing of your Relevant Personal Data by us or on our behalf, where such processing is based on Articles 6(1)(e) (public interest) or 6(1)(f) (legitimate interests) of the UK GDPR; and

- **the right to object to the Processing of your Relevant Personal Data by us or on our behalf for direct marketing purposes.**

This does not affect your statutory rights.

To exercise one or more of these rights, or to ask a question about these rights or any other provision of this Notice, or about our Processing of your Personal Data, please use the contact details provided in Section (P) below. Please note that:

- in some cases it will be necessary to provide evidence of your identity before we can give effect to these rights; and
- where your request requires the establishment of additional facts (e.g. a determination of whether any Processing is non-compliant with applicable law) we will investigate your request reasonably promptly, before deciding what action to take.

(O) Direct marketing

Summary – Direct marketing

We Process Personal Data to contact you with information regarding our services that may be of interest to you. You may unsubscribe for free at any time.

We Process Personal Data to contact you *via* email, telephone, direct mail or other communication formats to provide you with information regarding our services that may be of interest to you. If we provide our services to you, we may send information to you regarding our services, upcoming promotions and other information that may be of interest to you, including by using the contact details that you have provided to us, or any other appropriate means, subject always to obtaining your prior opt-in consent to the extent required under applicable law.

You may unsubscribe from our promotional email list at any time by emailing us as noted in every promotional electronic communication we send. Please note that it may take up to 2 weeks to process your unsubscribe request during which time you may continue to receive communications from us. After you unsubscribe, we will not send you further promotional emails, but in some circumstances we will continue to contact you to the extent necessary for the purposes of any services you have requested.

(P) Details of Controllers

Summary – Details of Controllers

There is only one Alinor Capital entity that acts as a Controller for the purposes of this Privacy Notice.

For the purposes of this Notice, the relevant Controller is:

Controller entity	Contact details
Alinor Capital Management LLP 20 North Audley Street, London W1K 6WE Limited Liability Partnership Number OC448165	Micheal Sutton compliance@alinorcapital.com

(Q) Definitions

- **“Adequate Jurisdiction”** means a jurisdiction that has been formally designated by the European Commission as providing an adequate level of protection for Personal Data.

- **“Controller”** means the entity that decides how and why Personal Data are Processed. In many jurisdictions, the Controller has primary responsibility for complying with applicable data protection laws.
- **“Data Protection Authority”** means an independent public authority that is legally tasked with overseeing compliance with applicable data protection laws.
- **“GDPR”** means the General Data Protection Regulation (EU) 2016/679.
- **“Personal Data”** means information that is about any individual, or from which any individual is directly or indirectly identifiable, 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 individual.
- **“Process”, “Processing” or “Processed”** means anything that is done with any 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 any person or entity that Processes Personal Data on behalf of the Controller (other than employees of the Controller).
- **“Profiling”** means any form of automated Processing of Personal Data consisting of the use of Personal Data to evaluate certain personal aspects relating to a natural person, in particular to analyse or predict aspects concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements.
- **“Relevant Personal Data”** means Personal Data in respect of which we are the Controller.
- **“Sensitive Personal Data”** means Personal Data about race or ethnicity, political opinions, religious or philosophical beliefs, trade union membership, biometric data, physical or mental health, sexual life, any actual or alleged criminal offences or penalties, national identification number, or any other information that are deemed to be sensitive under applicable law.
- **“Standard Contractual Clauses”** means template transfer clauses adopted by the European Commission or adopted by a Data Protection Authority and approved by the European Commission.
- **“UK GDPR”** means the GDPR as it forms part of the laws applicable in the UK by virtue of section 3 of the European Union (Withdrawal) Act 2018 and the Data Protection Act 2018, and as applied and modified by Schedule 2 of the Data Protection, Privacy and Electronic Communications (Amendments etc) (EU Exit) Regulations 2019 (SI 2019/419) or as modified from time to time.
- **“UK International Data Transfer Agreement”** means the template transfer agreement adopted by the UK Information Commissioner's Office on 21 March 2022.