

**INFORMATION  
ABOUT THE  
PRIVACY OF  
YOUR DATA**



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THE THOUGHTFUL INVESTOR

## WHO ARE WE?

Replace the first paragraph with: Castlefield is an investment and advisory business. Our holding company is Castlefield Partners Limited.

For the purposes of data protection regulation, we're a 'data controller'. This means that we have responsibility for the data that we collect and we must exercise control over its processing in the course of our work. We must determine the purposes for our collecting your personal data in the first place and then monitor the way in which we process it, to make sure that we meet strict data protection regulations.

## WHAT IS THIS NOTICE ABOUT?

On 25<sup>th</sup> May 2018 the General Data Protection Regulation (GDPR) came into force in the UK and across Europe. Having been brought into UK law, the aim of the UK GDPR is to reshape and enhance the way that all organisations approach data privacy, making them more accountable for the way that they process and manage personal data and giving greater rights of protection to data subjects.

This notice will show you what we have done and will continue to do at Castlefield to meet the requirements of the UK GDPR. It'll explain what data we collect about you, what we use it for and how we use it.

# YOUR INFORMATION

## WHAT DO WE MEAN BY INFORMATION?

This notice will refer to 'personal data'. This means any information that can be used to identify a living individual and that can be used to distinguish between individuals.

It can apply to data that's already in the public domain or restricted personal data that you disclose to us.

In addition, there are extra regulations around 'sensitive personal data'. This is data of a more personal nature, which could feasibly be misused against an individual. At Castlefield we might collect sensitive personal data where we need it to provide a service to you. For example, to provide financial advice relating to your pension planning we may ask you questions about your health and medical condition, or to ensure that the investment products we supply to you are suitable we must ask for information relating to your financial situation. We'll only collect sensitive personal data where there is a lawful basis for us to do so.

Although GDPR, the data protection law that governs all organisations, specifically applies to living people, at Castlefield we take the view that personal information relating to deceased individuals should be treated in the same way as the living, and we apply the same restrictions to the way we process it.

## HOW DO WE COLLECT YOUR INFORMATION?

In the main we'll ask you directly for your information so that we can use it to provide a service to you. For example, we'll ask for your address and telephone details so that we can contact you to discuss your investments. If you are ever unsure about providing information to us, one of the Castlefield team will be happy to explain more about why we're asking and how we'll use your data.

If Castlefield's services have been recommended to you by a third party, for example an external financial advice or investment firm, we may have received your information indirectly after you've given that party permission to share it with us.





## WHY DO WE COLLECT YOUR INFORMATION AND HOW DO WE USE IT?

In a nutshell, we'll use your information to carry out the work that we need to do to provide the best service to you. If you don't provide information to us we might not be able to offer you the intended service; or at least not to its fullest extent.

Here are some examples of the types of information we might ask you for, what we do with it and the legal reasons we have for processing it:

- Your name, address and contact details are requested on our forms when you enquire about our financial advice or investment management services, or if you invest in one of our funds. We need these to fulfil our duties according to our contract with you and to contact you when we need to. We'll also let you know about other services offered by Castlefield if they're appropriate and we think you'd be interested
- We collect information to confirm your identity, such as your National Insurance Number, and any previous names and addresses. We'll also ask for proof of identity documentation, such as your passport, driving licence or recent utility bills. We need this information to confirm your identity and meet the legal obligations set out for us by our regulators, to prevent money laundering and help to detect criminal activity
- Information will be collected about your accounts with us and any accounts we advise you on, including cash movements and transactions on those accounts. This information allows us to advise you properly on your assets according to the contract we have with you, but we may also need it to fulfil reporting obligations set out by our regulators, such as sending you annual declarations of costs and charges, suitability reports or portfolio valuations
- Key information about the performance of your assets may be used to assess the competence of authorised persons within Castlefield, such as our financial advisers and investment managers. As far as possible we anonymise information to do this, but it isn't always appropriate. This type of monitoring is a regulatory requirement, but is also in the legitimate interests of Castlefield and all of our clients, to ensure that we are providing high standards of ongoing service

## WHO MIGHT WE SHARE YOUR INFORMATION WITH?



We won't sell or pass your data to any third parties outside of our group of companies for marketing or research purposes. However, if we think a product or service offered by Castlefield would be of interest to you we may contact you to tell you about it.

Because we're a business with social responsibility at our core you can trust that we'll always try to keep mailings to a minimum. Occasionally though we might like to keep you informed about Castlefield products, events and opportunities. You can opt out of this at any time by emailing [opt-out@Castlefield.com](mailto:opt-out@Castlefield.com).

On occasion we might need to share your information with third parties outside of Castlefield who we use to carry out certain activities. This is usually either to allow us to arrange or provide a service and fulfil our contract with you, or because of a regulatory or legal requirement.

### Here are some of the times we might currently share your data and why:

- To conduct identity verification checks, we use third party agencies. It's a legal requirement that Castlefield complete these checks, as it is for any other regulated financial services company. The agency we currently use is SmartSearch.
- Castlefield works with a number of external providers to deliver our products and services to you. For example, we may use an external custodian to hold your investments or utilise a webmail service to send a communication to our clients. We conduct due diligence on the parties we choose to work with including, amongst many things, checking to ensure that they have sufficiently robust data protection policies and procedures in place of their own.
- We may use information we already hold with social media platforms in order to create 'lookalike' audiences of people displaying similar traits. You will not be targeted specifically as a result of this action and you will not be marketed to by them.
- We are legally obliged to share information, on request, with our regulatory and supervisory authorities, including the Financial Conduct Authority (FCA), the Information Commissioner's Office (ICO) and the Financial Ombudsman Service (FOS).
- In some instances, we may be required to share information with law enforcement agencies in the detection and prevention of crime. This would happen where there is a legal requirement or if it were in the public interest.
- We may share your information with HMRC for tax reporting purposes, if we have a legitimate interest in doing so. One example of this is where we send annual reports to HMRC relating to our clients' ISA accounts.

## WHAT DO WE DO TO PROTECT THE SECURITY OF YOUR INFORMATION?

Data protection is at the centre of our operational culture here at Castlefield. All employees undergo regular data protection training and sign annual declarations to say that they'll adhere to the strict codes of practice required of them.

We use the services of UK based IT Firms, Ashmore IT and Cube Technology, who carry out regular testing to ensure our software systems and servers are protected by rigorous e-safety measures, such as using data encryption, firewalls and password protection.

Our head office is based in Manchester. We mainly store your data electronically on our secure cloud servers. Access is strictly controlled so that only authorised personnel can use it. When we receive or use your data in a physical form we have strict procedures surrounding this too. For example, we operate a clear desk policy, whereby all physical documents are locked securely away when we're not using them, and are shredded when no longer required.

Where our employees are called to work remotely, for example when attending meetings with clients or whilst working from their own homes, they access our computer systems remotely. When they do so, they use devices that are securely protected by measures that are at least equal to those we use for our office based systems. These measures include strict password protection and where possible, data is encrypted so that anybody attempting to intercept would not be able to read it.

## HOW LONG DO WE KEEP HOLD OF YOUR INFORMATION?

We'll retain your information for as long as we're providing our professional services to you. If you decide to end your relationship with Castlefield, we'll keep your information on file for as long as we have a legal requirement to do so.

We're subject to regulatory requirements to retain your data for specified minimum periods. These include five years for investment business, three years for insurance business and indefinitely for any pension transfers and opt-outs.

Exactly how long we'll need to keep your data on file will vary depending on the individual case, however we aim to retain personal information for no longer than we have a legal basis on which to do so.

## PROFESSIONAL CONTACTS

If you are a financial services professional and have been in contact with our marketing team, they will add your name, email address, company reference and other relevant contact details to our marketing database. Our marketing team use a cloud software suite called 'Zoho' to store the details of their financial services professional contacts. ZOH0 is an EU based platform using servers and technology based in the EU.

As with all the data we collect, we won't sell or pass your details to any third parties outside of our group of companies for marketing or research purposes. However, we will let you know if we think a product or service offered by Castlefield would be of interest to you or your clients.

If you would like us to remove your professional contact details at any time you can use the 'opt-out' option on the emails you receive from our marketing team for direct removal, or simply tell them that you no longer wish to remain on the database.

Unless you ask us to remove your details, we will keep them on our database for as long as we believe we have a legitimate business interest in doing so.





# THE RIGHTS OF ACCESS THAT YOU HAVE TO YOUR DATA

You have the right to request a copy of the information that we hold about you. Please write to us at the following address.

## THE DATA PROTECTION OFFICER

Castlefield Partners Limited  
111 Piccadilly  
Manchester  
M1 2HY

The GDPR introduces further rights for data subjects in the UK including their right to be informed, right to rectification, right to restrict processing and right to erasure (also known as the 'right to be forgotten').

You can find out more about these from the Information Commissioner's Office's own website: [www.ICO.org.uk](http://www.ICO.org.uk).

As you can appreciate, the way that we would approach each of these rights here at Castlefield, would depend on the specific nature of the individual request. If you would like to know more about the provisions that we've put in place please contact us at the above address or ask your usual contact, who would be happy to explain further.

## ABOUT THIS PRIVACY NOTICE

Please contact us at the above address if you have any further questions about this privacy notice. You can also speak to your usual contact at Castlefield, who would be happy to provide you with more information about this notice and answer any questions that you may have.

In line with our ongoing commitment to data protection we keep our privacy policy under regular review.

This policy will be published on our website, [www.castlefield.com](http://www.castlefield.com), where any changes will also be kept up to date. The most recent version of this policy was published in August 2023.

# SPECIFIC CONSENT

## MARKETING

From time to time, Castlefield group may update you about products, services, events and opportunities that we think you'll be interested in. We promise not to bombard you with emails or marketing and we won't sell or pass your data to any third parties outside of our group for marketing or research purposes. You can opt out at any time by emailing [opt-out@castlefield.com](mailto:opt-out@castlefield.com)

**I consent to be contacted for marketing purposes by:**

Email:  Telephone:  Secure portal:  Post:

Client name:

Client signature:

Date:   /   /

Email:  Telephone:  Secure portal:  Post:

Client name:

Client signature:

Date:   /   /

**Please note that you may withdraw this consent at any time by notifying us at our main business address.**

## SENSITIVE PERSONAL DATA

**Special categories of personal data:** there are certain categories of personal data that are sensitive by nature and require extra protection. These include: data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership and data concerning health. Due to the nature of the service we provide you with, you may volunteer information which includes one or more of these special categories. Our policy is that should we require any special category of personal data we will only gather, hold and process this information with your explicit consent.

The primary basis on which we intend to process your personal data is for the performance of our contract with you. In the case where we need to process special category (sensitive) data as described above we require your consent by indicating your agreement to the following statement:

**I consent to the processing of sensitive personal data as far as it is necessary for the services I require from Castlefield.**

Client name:

Client signature:

Date:   /   /

Client name:

Client signature:

Date:   /   /

**Please note that you may withdraw this consent at any time by notifying us at our main business address.**

**!** Please ask for any additional copies for extra signatories if required.



THE THOUGHTFUL INVESTOR

111 Piccadilly,  
Manchester M1 2HY  
0161 233 4890  
castlefield.com

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