

PRIVACY NOTICE

Neptune respects your privacy and is committed to protecting your personal data. As the Data Controller, Neptune Investment Management is responsible for determining the purposes of processing your personal data. This privacy notice will inform you as to how we look after your personal data including when you visit our website regardless of where you visit it from and tell you about your privacy rights and how the law protects you.

This privacy notice is provided in a layered format so you can click through to the specific areas set out below. We hope that the following sections will answer any questions you may have but do get in touch if you have any further questions.

We may update this privacy notice from time to time by updating this page. This version was last updated on 11 May 2018. Use of our services following these changes and your continued provision of personal data to us signifies acceptance of the latest version of the privacy notice.

For specific information about our use of cookies, visit our [Cookie Policy](#).

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1. PURPOSE OF THIS PRIVACY NOTICE

This privacy notice aims to give you information on how Neptune collects and processes your personal data including any data you may provide through this website when you sign up to our newsletter, purchase a product/service or take part in a competition.

This website is not intended for children. We do not collect data relating to children except where a JISA account is opened with parental or guardian consent and the child's data is necessary for the performance of a contract.

It is important that you read this privacy notice together with any other privacy or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

2. THE DATA WE COLLECT ABOUT YOU

Personal data or personal information means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.
- **Contact Data** includes billing address, delivery address, email address and telephone numbers.
- **Financial Data** includes bank account and payment card details.
- **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us by contacting us on 0800 587 5051 (or +44 1268 44 3920 if calling from outside the UK). Or write to us at:

Neptune Investment Management
 PO BOX 9004
 Chelmsford
 Essex
 CM99 2WR

We may also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

We do not typically collect any **Special Categories of Personal Data** about you. Please do not send us any personal data which would be considered as a special category of personal data (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

IF YOU FAIL TO PROVIDE PERSONAL DATA

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you. In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

3. HOW IS YOUR PERSONAL DATA COLLECTED?

We use different methods to collect data from and about you, mainly:

- When you visit our website.
- When you create an account with us.
- When you contact us by any means to request information about a product, service or event.
- When you engage with us on social media.
- When you choose to complete any surveys we send or to enter a competition.

4. HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party). Your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.
- For direct marketing purpose including sending you investment service and products.

Below are the types of lawful basis that we will rely on to process your personal data:

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new customer	(a) Identity (b) Contact	Performance of a contract with you
To process and deliver your order including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to collect and recover debts due to us)
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a survey	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)
To enable you to partake in a prize draw, competition or complete a survey	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)

<p>To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</p>	<p>(a) Identity (b) Contact (c) Technical</p>	<p>(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation</p>
<p>To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you</p>	<p>(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical</p>	<p>Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)</p>
<p>To use data analytics to improve our website, products/services, marketing, customer relationships and experiences</p>	<p>(a) Technical (b) Usage</p>	<p>Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)</p>
<p>To make suggestions and recommendations to you about goods or services that may be of interest to you</p>	<p>(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile</p>	<p>Necessary for our legitimate interests (to develop our products/services and grow our business)</p>

THIRD-PARTY LINKS

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

THIRD-PARTY

We have to share your personal data with third parties in connection with the services we are providing for the purposes set out in the table in paragraph 4 above. Disclosures of personal data may include disclosures:

- To our third party processors and service providers who provide services such as order execution, payment processing and related infrastructure provision, customer service, information technology, website hosting and data analysis.
- To our third party experts and advisers including external lawyers and auditors.
- To payment, banking and communication infrastructure providers.
- To third party storage providers including archive service providers.
- To other persons as agreed with our client or as required or expressly permitted by applicable law.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

MARKETING

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or entered into a contract with us or if you provided us with your details when you entered a competition or registered for a promotion and, in each case, you have not opted out of receiving that marketing.

5. INTERNATIONAL PROCESSING

The data that we collect from you will be processed by staff operating outside of the European Economic Area (“EEA”) who work for one of our suppliers. This includes staff engaged in the provision of support services. By submitting your personal data, you agree to this processing. We will take all reasonable steps necessary to ensure that your data is treated securely and in accordance with this privacy notice.

6. HOW WE PROTECT YOUR PERSONAL DATA

We look to ensure that your personal data is processed and stored securely by means of appropriate technical and organisational measures.

We regularly monitor our system for possible vulnerabilities and attacks, and we carry out testing to identify ways to further strengthen security.

7. HOW LONG WE RETAIN YOUR PERSONAL DATA FOR

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

At the end of that retention period, your data will be deleted completely. In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

8. YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data. You have the right to:

- **Request access to the personal data** we hold about you, free of charge in most cases.
- **Request correction of the personal data** we hold for you when incorrect, out of data or incomplete.
- **Request erasure of your personal data** in certain circumstances, for example, if the personal data is no longer necessary for the purpose which you originally consented.
- **Object to the processing** of your personal data, so that we stop any consent-based processing of your personal data, after you withdraw consent. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.
- **Restrict the processing** of the personal data we hold, when verifying accuracy of personal data or due to your objection to processing your personal data.

If we choose not to action your request, we will explain to you the reasons for our refusal.

You have the right to request the transfer of your personal data to a third party. In such circumstances we will provide the third party, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

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.

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.

Neptune will never contact you by phone or email requesting personal details or account information. If you receive such a request, please do not respond to it and notify us at enquiries@neptune-im.co.uk.

Recording of Communications

We record and monitor telephone calls and electronic communications including emails for compliance, quality assurance and governance purposes.

Contacting the Regulator

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance on: 0800 587 5051 (or +44 1268 44 3920 if calling from outside the UK). Or write to us at:

Neptune Investment Management
PO BOX 9004

Chelmsford
Essex
CM99 2WR

We have appointed a data protection officer (DPO) who is responsible for overseeing questions in relation to data protection. The appointed DPO can be contacted at: ComplianceGroupEmail@neptune-im.co.uk or you can write to the DPO at:

Data Protection Officer
Neptune Investment Management
3 Shortlands
London
W6 8DA