

Privacy Notice & Cookie Policy

Background

This privacy notice is provided by Alder Investment Management Limited and its parent company, Alder Asset Management Limited who will be referred to in this document, collectively, as “Alder”. This notice provides information on how Alder collect, use and protect the personal data we hold.

This notice describes how we will fulfil our obligations under applicable data protection laws, including the General Data Protection Regulation (“GDPR”).

Please read this privacy notice carefully to understand what we do with your personal data. We may change this privacy notice from time to time and if we make any material changes then we will make the updated privacy notice available to you via our website or by other means.

In this document, “we” and “our” refer to Alder.

What kind of personal data do we collect?

We collect and process various categories of personal information at the start of and during your relationship with us. We collect personal information such as your name, date of birth, residential and email address, contact telephone numbers, photographic identification, passport number, bank account details, national insurance number, nationality, citizenship, tax references and residency, marital status, source of wealth and information about your financial circumstances.

How do we collect your personal data?

Most of the personal information we hold will have been provided by you through on-boarding forms and procedures, conversations or other correspondence with you. Alder also collects personal data from third parties acting on your behalf or from publicly available sources such as Companies House.

How will we use your personal data?

This section of the privacy notice explains for what purposes we use your personal data and on which legal bases we rely, to ensure that we process your personal data lawfully. Our legal bases for collecting and using your personal data will include:

- To perform our contract with you where you are a client of Alder (e.g. to verify your identity, open your account, manage your investments and provide financial and other information to you);
- To comply with our legal and regulatory obligations including, but not limited to, those laid down in the Financial Conduct Authority’s Handbook, Money Laundering Regulations, Company, Tax and Trust Law;

Who do we share your personal data with?

We may disclose your personal data for the purposes described in this privacy notice with third parties specifically engaged to provide services to us such as banks, custodians, tax advisors and our auditors. Where we use third parties who process your personal data on our behalf as a processor, we ensure they do so in accordance with our instructions and that they have appropriate technical and organisation security measures in place to adequately protect your personal data.

We may disclose your personal data for the purposes set out in this privacy notice to other third parties e.g. governmental agencies, tax and other regulatory authorities, where we are legally obliged to do so or in our reasonable opinion such disclosure is necessary to comply with applicable laws and legal processes, support an investigation or to protect our rights and interests.

The data protection measures we take

We take the security of all data we hold seriously and we maintain a culture of confidentiality. We apply appropriate technical and organisational information security measures designed to protect data in our possession from unauthorised access by third parties or any form of computer corruption.

We shall notify you of any personal data breach affecting you that is likely to result in a high risk to your rights and freedoms.

In the event we transfer personal data outside the EEA it shall be in accordance with the conditions in the GDPR.

Cookies on our website*How we use cookies*

Alder is committed to ensuring that your privacy is protected. Should we ask you to provide certain information by which you can be identified when using this website, you can be assured that it will only be used in accordance with this privacy statement.

Use of Cookies

A cookie is a small file which asks permission to be placed on your computer's hard drive. Once you agree, the file is added and the cookie helps analyse web traffic or lets you know when you visit a particular site. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences.

We use traffic log cookies to identify which pages are being used. This helps us analyse data about webpage traffic and improve our website in order to tailor it to customer needs. We only use this information for statistical analysis purposes and then the data is removed from the system.

Overall, cookies help us provide you with a better website by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us.

You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of the website.

Links to other websites

Our website may contain links to other websites of interest. However, once you have used these links to leave our site, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this privacy statement. You should exercise caution and look at the privacy statement applicable to the website in question.

Your data protection rights

Subject to the conditions prescribed in applicable laws, you have certain rights regarding our use of your personal data, examples of which are summarised below:

- The right to be informed about the collection and use of your personal data;
- The right to access the data we hold about you (in an easily readable format);
- The right to have inaccurate personal data rectified;
- The right to data portability in certain circumstances;
- The right to restrict the use of your data in certain circumstances;
- The right to erase the data we hold about you in certain circumstances;
- The right to lodge a complaint to the Information Commissioner's Office.

Our retention of your personal data

Personal data held by Alder will be kept confidential. How long we hold your personal data for will vary and will be determined by various criteria, including:

- The purpose for which we are using it - we will need to keep the data for as long as is necessary for that purpose; and
- Legal obligations - laws or regulations may set a minimum period for which we have to keep your personal data.

How you can contact us

Alder is not required to designate a data protection officer, however, should you have any queries or wish to discuss your data protection rights with us, please contact us at;

aimcompliance@alder-investment.co.uk or by writing to Alder Investment Management Limited, Compliance, 1 King's Arms Yard, London, EC2R 7AF.