



## DATA PRIVACY NOTICE

Last updated: 25th May 2018

### 1 . WHO WE ARE

Guy Butler Limited (“we” or “GBL”) respect and value the data protection rights and privacy of individuals whose personal data we process.

In our relationship with you or the organisation that you represent, we are primarily a data processor for the purposes of the processing of your personal data, however in limited circumstances we will be a separate data controller of the personal data that you provide us with.

For more details, or if you have any questions, you can contact us at [admin@guybutler.co.uk](mailto:admin@guybutler.co.uk).

### 2. HOW DO WE USE YOUR PERSONAL DATA

We use your personal data for the activities and reasons set out below:

- a) to verify your identity, and complete know your customer (KYC) due diligence and anti-money laundering (AML) screening checks;
- b) to provide and support our services to the organisation you represent;
- c) to issue invoices, resolve fee disputes and other associated billing services;
- d) to comply with our legal obligations;
- e) to comply with our regulatory obligations;
- f) to monitor compliance with contractual terms and Terms of Business;
- g) to enhance security, prevent fraud or market abuse, monitor and verify identity or service access, combat spam or other malware or security risks;
- h) to deliver targeted marketing and service update notices;
- i) to enforce our agreements with third parties; and
- j) to protect our business and to enforce and exercise our rights.

### 3. WHAT DO WE COLLECT

In order to conduct the activities set out above, we collect certain personal data from you, and others. In some circumstances, we are required to collect this information by law.

We collect the following personal data:

- When the organisation that you represent becomes a customer and/or you become a user of our services, we may collect the following types of information: your name, gender, date of birth, government-issued identification and/or number, photo identification, address, phone, fax, email, country of residence, nationality, place of birth, country of birth and occupation.
- For certain services, we may require additional information if required under applicable

law or to meet our regulatory obligations, including under MIFID II and equivalent regulation of other jurisdictions. The types of information may include your CV, criminal convictions, bank account details, proof of address (e.g., utility bills) and your registration details with any competent authority.

- Whenever you contact us or respond to our communications (e.g., in email, telephone, or writing), we receive your contact information and any other personal data you choose to provide us. GBL will use such information to fulfil your requests or to provide services.
- We collect personal data when you use or request information about our services, subscribe to marketing communications, complete surveys, or sign up for and/or attend events GBL participates in.

#### 4. WHERE IS THE DATA FROM

- We collect personal data that you give us: directly by filling in forms, using our services and contacting us, and that we learn about you from our business interactions, communications and dealings with you.
- We collect personal data from others: when we obtain information about you from third party sources as permitted by applicable law, such as from public databases, joint marketing partners, and social media platforms:
  - Public Databases, Credit Bureaus & ID Verification Partners: in order to comply with our legal obligations, such as AML laws, and to prevent and detect fraud and market abuse, we obtain personal data from public databases and ID verification partners for the purposes of verifying your identity. ID verification partners use a combination of government records and publicly available information about you to verify your identity. Such personal data includes your name, address, job role, public employment profile, credit history, status on any sanctions lists maintained by public authorities, and other relevant personal data. In some cases, we may process additional personal data to ensure our services are not used fraudulently or for other illicit activities.

#### 5 . HOW IS YOUR DATA SHARED

We disclose your personal data for the purposes set out above:

- to business partners, professional advisors, suppliers and sub-contractors for the performance of any contract we enter into with them or the organisation that you represent;
- to organisations and individuals involved in events that GBL participates in;
- to your colleagues within the organisation that you represent; and
- where required
  - to competent regulatory, prosecuting and other governmental agencies, or litigation counterparties, in any country or territory;
  - to third parties as part of a reorganisation, sale, merger or joint venture
  - any other situation where disclosure is required by law

Please note that third parties you interact with, including your employer, may have their own privacy policies, and GBL is not responsible for their operations, including, but not limited to, their personal data practices. Personal data collected by third parties, which may include contact details, is governed by their privacy practices. We encourage you to learn about the

**Guy Butler Limited**

privacy practices of those third parties.

## 6 . RETENTION OF PERSONAL DATA

GBL will retain your personal data for as long as is necessary for the purposes of our business relationship with you, to perform our contractual obligations to you and, if longer, as required for legal and regulatory purposes.

We have established internal policies for the deletion of personal data in accordance with our legal and regulatory obligations.

## 7 . INTERNATIONAL TRANSFER OF PERSONAL DATA

GBL is located in the United Kingdom (UK) (which is within the European Economic Area (EEA). Following the triggering of Article 50 of the Lisbon Treaty, the UK is within the two year window specified to withdraw from the EU.

We and our service providers may store, transfer and process your personal data outside of the EEA. Where we disclose personal data, as set out in section 5, these disclosures may include transfers to countries outside the EEA/ UK, which do not have similarly strict data privacy laws and may afford a lower standard of personal data protection.

In those cases where we transfer personal data to our service providers, we will ensure that our arrangements with them are governed by European Commission approved data transfer agreements, designed to ensure that your personal data is protected.

## 8. YOUR RIGHTS

In the limited circumstances where we act as data controller, EU citizens have certain data protection rights, including:

- the right to access your personal data;
- the right to restrict the use of your personal data;
- the right to have incomplete or inaccurate data corrected;
- the right to ask us to stop processing your personal data; and
- the right to require us to delete your personal data in some limited circumstances.

You also have the right in some circumstances to request for us to "port" your personal data in a portable, re-usable format to other organisations (where this is possible).

## 9. SECURITY

Whilst GBL takes appropriate technical and organisational measures to safeguard the personal information that you provide, no transmission over the Internet can ever be guaranteed secure. Consequently, please note that the security of any personal information that you transfer over the Internet to GBL cannot be guaranteed.

## 10. HOW TO CONTACT US

We welcome questions, comments and requests regarding this data privacy notice and our processing of your personal data. You can contact us at [Admin@guybutler.co.uk](mailto:Admin@guybutler.co.uk).

You can also complain about our processing of your personal data to the relevant data protection authority. In the UK, the relevant data protection authority is the Information Commissioner's Office (ICO).