

How we hold and process your information.

The new EU General Data Protection Regulation (GDPR), effective from 25 May 2018, sets out the rules we have to follow in relation to the personal data we hold about you, and your rights regarding that data. This notice explains why we hold this information, how we use it and your rights in relation to how we hold and process this information.

Who are we?

Seneca Investment Managers Limited (SIML) is an FCA regulated investment manager to a number of UK based funds. As investment manager, Seneca Investment Managers Limited acts as both a processor and controller.

What is personal data?

Personal data is any information relating to an identifiable person, who can be directly or indirectly identified by reference to such data. Such information includes, name, email address, mailing address.

The personal information we hold about you is information

- you have directly provided to us electronically, written or verbally via the website, email, telephone;
- we receive from trusted third parties.

Why we hold personal data

We need this information so that we can:

- provide investors in the funds with clear information on their investments, for example, factsheets or reports;
- provide any necessary information to you if you ask us;
- provide information to any relevant regulatory authority or in respect of any court order;
- provide information to any company to which we have outsourced services;
- provide information to any group company;
- use the data for fraud prevention and anti-money laundering purposes.

We will keep your personal data for no longer than necessary. We have regulatory and legal obligation to keep your data for at least 6 years before it is deleted.

Lawful processing

Seneca Investment Managers Limited's general commitments to privacy are such that:

- We will only collect, keep, use and share data for the legitimate business purposes that are explained below, or if we are legally obliged to do so.
- We will be as clear and transparent as we can with you regarding what data we collect and how it will be processed.

- For as long as we hold your data, we will take appropriate measures to secure it.

In many cases we are the Data Controller and Processor. However, where we are acting on behalf of other Group entities we may be only a Data Processor as directed by the Data Controller. That Data Controller is contracted to provide services to you that we may partially be fulfilling

All personal information is lawfully processed by Seneca Investment Managers Limited, the information has been provided to us for the purposes of investment management. We hold this information under the legitimate interest provision of the GDPR. We also may use your information to send you marketing information that may be of interest in accordance to the ePrivacy Directive and you can unsubscribe at any point by clicking the unsubscribe button on the email. Once you have unsubscribed we will no longer market to you email or otherwise.

Disclosure of personal data

Where appropriate we may disclose your personal data outside of Seneca Investment Managers to third party agencies or contractors in the provision of services provided to us, for example IT and communication providers.

Your rights in respect of this data

Rights to access

You can request a copy of the personal information that we hold about you. This is known as a 'Data Subject Access Request'. In normal circumstances SIML has one month to respond and our response is normally free of charge.

Right to rectification

We make every effort to hold accurate data about you. Should you be aware that our information is incorrect, please inform us and we shall rectify this normally within one month.

Right to erasure

You have the right to request for your personal information to be erased if we no longer have a lawful basis for processing your information.

Right to object

If you do not agree we have a legitimate interest to process your personal data, you have the right to object to this processing.

Any and all requests will be fully reviewed by SIML and response with actions will be sent within one month.

Right to complain to a supervisory authority

Privacy notice



If you are dissatisfied with our use or management of your personal information, you have the right to complain to an EU Data Protection Supervisory Authority. That authority should be located where you live, where we are based, or where you feel the issue you wish to complain about took place. In the UK the relevant Data Protection Supervisory Authority is the Information Commissioner's Office (ICO) and you can contact them via their website: www.ico.org.uk.

Contact

Seneca Investment Managers Limited is both a controller and data processor. You can contact us directly about how we use your personal information or to exercise your rights in respect of this data:

Email us directly at Seneca.dataprotection@senecaim.com

Or write to us at:

Seneca Investment Managers (Data protection)

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Horton House
Exchange Flags
Liverpool L2 3YL

Multi-Asset Value Investing