

Privacy Policy

This Privacy Policy applies between you, an individual, and us, SI Capital. It applies to all personal data that you provide us with as a customer or as a user of our website.

Our Privacy Promise

We promise:

- To keep your data safe and private;
- Not to sell your data;
- To give you ways to manage and review your marketing choices at any time.

How the Law Protects You

In addition to our Privacy Promise, your privacy is protected by law. The General Data Protection Regulation (GDPR) is the relevant legislation which came into force across the EU on 25th May 2018.

Data protection law states that we should only collect and use your personal information if we have a proper reason to do so. This includes sharing it within and outside of SI Capital. The law states we must have one or more of the following reasons:

- To provide the services you have requested from us;
- When it is our legal duty;
- When it is in our legitimate interest (e.g. a valid business or commercial reason);
- When you consent to it.

You agree that we may hold information about you and your affairs in order to (as applicable):

- Verify your identity and financial standing;
- Provide you with our services (which may also necessitate liaising with third parties, such as clearing brokers, companies and their registrars, and disclosing some aspects of your personal information in order to verify or otherwise discuss your investments in the proper provision of our services); and
- Keep you up-to-date regarding other services which we consider may be of interest to you. When you open your account you will be asked to confirm what, if any, direct marketing information you want to receive. Should you change your mind at any time, you will be able to update your preferences easily.

We will treat all personal information about you and your financial affairs as confidential. We may however disclose any such information:

- To our authorised agents and firms for whom we use outsourced share dealing and/or administration services;
- If required to do so by law or regulation;
- If requested by a financial regulator or HMRC; and/or
- Where you have given your consent to the disclosure.

The information may also be shared with other financial organisations to protect us and our customers, and other financial organisations and their customers, against financial crime.

Your personal information is important to us.

We recognise that when you provide us with information you expect us to use it responsibly, to keep it up-to-date and to ensure it is only used for the purpose for which it is provided. We would therefore ask that you provide relevant, timely information about yourself and keep us advised of changes. We undertake to seek only relevant details, to safeguard them, and to use them only to meet our statutory obligations and with your permission. In the sections below you'll see why we need certain pieces of information, how we use and safeguard it, and how you can help us keep it up-to-date.

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What information do we record?

Your personal information falls into two categories:

- Information you give us directly – this may be your address, nationality, National Insurance Number, telephone numbers, email address and investment information you provide when you open an account.
- Information we obtain indirectly from the way you use your account – this will include your dealing frequency, the type of investments you make and the range of services you use.

However this information is received we aim to store it securely and accurately, and to keep it up-to-date.

Where do we collect your personal information from?

We may collect personal information about you in the following ways:

You give your personal information to us:

- When you apply for our products and services
- When you speak to us on the phone (we record all incoming and outgoing calls);
- When you use our website
- In emails and letters

We collect personal information from you when you use our services and this includes:

- Payment and transaction data
- Profile and usage data including the profile we create for you to identify yourself when you connect to our internet services

How is it stored?

Information you provide is stored in two ways; in paper format and electronically:

Paper-based information may include application forms you complete, letters and faxes you send to us and correspondence we send to you. Correspondence received from you is also scanned and stored electronically for easy reference in the event of a query. All paper records are stored at our premises in Godalming or, once applications and necessary KYC checks have been completed, at our off-site archive facility. Access to both is controlled by electronic pass card and 24-hour security is in place.

Electronic information includes all personal details extracted from application forms etc., and transactional data from activity passing through your accounts, such as credits to your account, withdrawals, dividends received, share sales and purchases. All electronic information is stored in our own database which is not accessible other than by authorised employees of SI Capital and its clearing brokers. All clearing brokers are carefully selected and abide by stringent Service Level and Non-Disclosure agreements.

In addition, electronic information is 'backed-up' on a regular basis and virtual data is stored off-site at a secure data back-up service provided by a third party, thus ensuring we can have our systems up and running as soon as possible in the event of a fire or other incidents. Off-site storage of data is subject to the same stringent safeguards as that stored on-site.

How is your personal information used?

Use of your information falls into two main categories:

1. Operating your account with SI Capital

The information you provide to us is used to ensure we can maintain contact with you and provide the services you have requested. Specifically we will use your personal information:

- To enable you to access (and where applicable trade investments through your account);
- To enable you to deposit money and make withdrawals;
- To manage fees, charges and any interest due;
- To detect, investigate, report and seek to prevent financial crime;
- To comply with relevant laws and regulations;

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- To respond to complaints and seek to resolve them to your satisfaction;
- To test new systems, products and services.

2. Providing you with information on products and services

As new products are introduced or changes made to existing services, we would like to advise you of them from time to time. We may use your personal information, with your previously obtained consent:

- To develop new products and services;
- To carry out marketing activities;
- To understand how customers use our products and services;
- To provide guidance about our products and services;

If you choose not to provide personal information

The majority of information we collect from you is necessary for us to be able to provide the products and services you have requested.

If you choose not to give us this personal information, it may delay or prevent us from providing these products and services. This could mean that we cancel that product or service you have with us.

Any personal information that is optional will be made clear at the point we request it.

How long we keep your personal information

We will keep your personal information for as long as you remain a customer.

When you stop being a customer we still need to retain your personal information to fulfil our ongoing legal and regulatory obligations. In most cases this will not be for longer than 5 years after our business relationship with you has ended.

What if you want us to stop using your personal information?

You have the right to object to our use of your personal information, or to ask us to delete, remove or stop using your personal information if there is no need for us to keep it (e.g. to fulfil our regulatory record keeping obligations). These rights are known as the “right to object”, the “right to erasure”, or the “right to be forgotten”.

There may be legal or regulatory reasons why we need to keep or use your data and therefore we may not be able to comply with your request.

If you want to object to how we use your data, ask us to delete it or restrict how we use it, please contact our compliance officer at Renato.Rufus@sicapital.co.uk.

How to withdraw your consent

Where you have provided your consent for us to process your personal data you can request to withdraw your consent at any time. Please contact us if you want to do so at Renato.Rufus@sicapital.co.uk.

Please be aware that if you withdraw your consent, we may not be able to provide some of our services to you. If this is the case, we will tell you.

Who Do We Share Your Personal Information With?

We may share your personal information with the following organisations to be able to provide you with the accounts and services you have chosen:

- Our clearing brokers;
- HM Revenue & Customs;
- The UK’s Financial Conduct Authority and other regulators or authorities;
- The UK’s Financial Services Compensation Scheme;
- The UK’s Financial Ombudsman Service;
- Fraud prevention agencies;
- Credit reference agencies to confirm your identity to help and detect and prevent financial crime;
- Any party linked with you or your business’s account or service;

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- Companies we have an agreement to distribute communications via email;
- Companies you ask us to share your data with;
- If you make payments to your account with a debit card we will share transaction details with companies which help us to provide this service;
- Tracing agencies should we lose contact with you.

Sending your data outside of the EEA

We will only send your data outside of the European Economic Area (EEA) either to follow your instructions or to comply with a legal or regulatory requirement.

Whatever the reason we will make sure the same stringent data protection arrangements are in place.

How can I check it?

Details that are recorded in your profile can be viewed online anytime by signing in to your account. You can also amend those details by contacting your broker in order to keep them up-to-date. Other information stored about you, but not visible via the 'my profile' section can be examined, free of charge, on request.

To request details of information stored, please contact the Data Protection Officer by post at:

SI Capital, 46 Bridge Street, Godalming, Surrey, GU7 1HL

Or by e-mail: Renato.Rufus@sicapital.co.uk

Please note, to help us process your request as quickly as possible, we may contact you to clarify what information you require from us and the format in which it should be provided to you.

Marketing

We can only use your personal information to send you marketing messages if we have either your consent or a 'legitimate interest'. That is when we have a business or commercial reason to use your information. It must not unfairly go against what is right and best for you.

We want to ensure we only advise you of services that are directly relevant to you or which may be of interest. To help identify this we will take into account your previous investment activity and other criteria, such as age, investment requirements and the type of investments you make which may indicate a possible interest.

SI Capital does not make your information available to any other organisation or business, other than its agents as detailed above.

We may communicate with you in a number of ways, for instance by letter, telephone, email or via the Internet. If you have a particular preference we will endeavour to use your preferred method of communication although there may be occasions where this is impracticable or where we are required by law or by our regulators to communicate in a particular way.

Tell us what information you want to receive, and your preferred method of contact, and we'll keep in touch in that way. If you tell us you don't want to receive marketing material then we won't contact you, other than to tell you about statutory changes, amendments to Terms and Conditions or other important changes you need to be aware of.

Our preferred method of contact is, wherever possible, by email but you may also choose to continue to receive certain information by post. This option currently covers Contract Notes for share sales /purchases and your half-yearly account statement.

Your commitment to us – Keeping Your Information Up-to-Date

It is important that details like your address, e-mail address, contact telephone numbers and bank account details are kept up to date.

It is vital, therefore, that you remember to advise us of any changes to these details.

Letting us know if your personal information is incorrect

If you believe any of the information that we hold about you is wrong or incomplete, please contact us to let us know and we will take reasonable steps to check its accuracy and correct it.

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