

**PRIVACY POLICY**  
MARCHANT GROUP LIMITED  
UPDATED MARCH 2019

Marchant Group Limited ('Marchant Group') is a data controller, in accordance with the EU General Data Protection Regulation 2018 and is committed to protecting your personal data and working in accordance with all relevant data protection legislation.

This Privacy Notice explains how Marchant Group processes and uses the personal data we collect from our clients, contacts and past, current and future suppliers and supporters. Personal data is used to provide relevant market information and the portfolio management service we have agreed to provide for the period agreed between you and your portfolio manager included in our management fee. We also provide a news and information service for individuals who have registered an interest in receiving information on the alternative investments Marchant Group offer which is delivered by electronic direct mail and by telephone by Marchant Group representatives.

We take your privacy seriously and will only use your personal information to process your account with us and to provide the products, services and market information that you have requested from us.

**What data do we hold?**

Marchant Group may hold data relating to you from a number of sources. The majority of the data we hold on you has been provided by you during the period of time that you have been a client, registered to receive our marketing information or since you attended an event or engaged with us in any other way.

Our records may include:

- **Contact details** – your postal address, email address details, telephone number, mobile telephone number – we update these details when you advise us that they have changed
- **Your portfolio information** – the details of the products that you have acquired from us and that we sell for you and the associated prices, your product storage and insurance information including any storage and insurance that you have organised independent of Marchant Group but you have notified us of
- **Payment information** – any card and bank details we have processed during the course of business with Marchant Group are securely managed in accordance with PCI/DSS
- **Events** – we may have a record of you attending a Marchant Group event
- **Personal details** – for event management purposes we may have a record of your dietary preferences or disability information

- **Your preferences** – to help us engage with you in the ways most relevant to you
- **Family details** – during our account management we may have collected information about your marital status and details of your spouse and other family members which may have been recorded to help us to deliver a more personal service

We may also augment the data you provide with data which is publicly available, for example we may record:

- Your career details and other achievements
- Your interests (wine, sport, art, classic cars, vintage watches, other)
- Your philanthropy, including donations and support to charities and other organisations.

We are required to ensure that data we hold about you is as accurate as possible, therefore we may update your details based on reliable publicly available sources, which may include:

- LinkedIn
- Twitter
- Reliable news and press reports
- Companies House, company websites and other business-related resources
- The Charity Commission and other websites relating to charitable trusts and foundations
- The Sunday Times Rich List.

In order to deliver a comprehensive service and to support our ongoing relationship we will retain your data unless you request otherwise.

### **How do we use your data?**

Marchant Group uses your data primarily to deliver its specialist portfolio management service, to provide information about alternative markets and other factors which may influence the performance of your portfolio and to offer other services including storage, insurance, events and club services relevant to your needs. Therefore, your information may be used for the following purposes:

- To allow your Marchant Group Portfolio Manager to manage your account and optimise your portfolio performance
- To provide you with our Monthly Market Report, Newsletter and specialist reports and other useful investor information
- To provide Certificates of Ownership of your product if applicable
- To manage the transfer, storage and insurance of your product with the storage facility if applicable
- To assist you with the sale of your product when you wish

- To introduce new investment opportunities to you that we feel are suitable for you
- To invite you to events
- To offer the opportunity to join Marchant Group member clubs
- To provide you with special offers and promotions
- To provide general information on the alternative asset market, explaining the fundamentals of investing in alternative assets and providing ongoing news and information relevant to investors and collectors or people considering creating an alternative asset portfolio

These activities may include an element of direct marketing of our products and services.

Communications may be sent to you by post, telephone, email, text or other electronic means (for example through social media) depending on the communication preferences you have shared with us.

### **How will we share your data?**

We may have to share some of the data you provide to us with our strategic partners who provide essential services including Marchant Group Consultants, our storage and insurance partners, auction houses or online exchanges for your product to be sold. Data may also be disclosed to other external organisations to facilitate payment for and product purchased such as Lloyds Bank plc, Cardnet, SagePay. Suppliers of essential services such as IT systems and others including logistics supply for the delivery of your product, will all have an agreement in place with Marchant Group which will include confidentiality terms and data protection.

Data is only shared with external parties whose involvement is required to deliver Marchant Group's business services. Marchant Group does NOT sell data to third parties or allow third parties to sell data where data is shared with them.

### **How do we protect your data?**

Your data is securely held on the Marchant Group database which is only accessible to a limited number of authorised Marchant Group personnel, who are all cognisant of Marchant Group's data protection policy.

Marchant Group ensures that appropriate data sharing agreements are in place prior to sharing your personal data with any partners.

### **Your rights and preferences**

Marchant Group may contact you from time to time by post, telephone, email or other electronic means as you have previously consented. If you wish to change the way in which we communicate with you, please contact the Marchant Group Administration team at 020 3489 4836 or by email at [info@marchantgroup.co.uk](mailto:info@marchantgroup.co.uk).

When contacting us please provide your name, your Client Account reference number and please specify which specific form of communication you would like to receive and any you may wish to opt out from.

If you ask us to delete your data, we will maintain a skeleton record comprising your name, client account number and postcode to ensure that we do not inadvertently contact you in future. We may also need to retain some financial records for statutory purposes.

### **Other information**

The legal basis for processing your personal data for the purposes described above is that it is necessary for the delivery of our legitimate interests to provide a specialist portfolio management and information service for individuals, companies, charities and other organisations.

This Privacy Notice will be kept under review. Any changes will be updated on our website and communicated as appropriate. This Privacy Notice was last updated in June 2018.

Marchant Group clients and contacts who have received communications from us have the right to:

- Ask us to see, correct or delete the data we hold about them
- Object to specific data uses, as described above
- Object to receiving communications and direct marketing.

Should you have any queries in relation to Marchant Group and our management of personal data please contact [jasmine@marchantgroup.co.uk](mailto:jasmine@marchantgroup.co.uk).

You can also contact the DPO if you have any questions or concerns about our processing of your personal data. You have the right to lodge a complaint with the Information Commissioner's Office at [www.ico.org.uk/concerns](http://www.ico.org.uk/concerns).