

## PRIVACY NOTICE

### 1 *Introduction*

Orion Global Advisors UK Limited (“**OGAUKL or the Company**”) is a company registered in England and Wales with company number 05149608. The Company is authorised and regulated by the Financial Conduct Authority (the “**FCA**”) with Firm Reference Number 415036. The Company’s registered office is 20 Old Bailey, EC4M 7AN, London, United Kingdom.

OGAUKL takes your privacy very seriously. We ask that you read this Privacy Notice carefully as it contains important information about what to expect when the Company collects personal information about you and how OGAUKL will use your personal data.

For the purposes of the General Data Protection Regulation (“**GDPR**”), the Company will be the “**Controller**” of the personal data you provide to us. Please read the following information carefully in order to understand the Company’s practices in relation to the treatment of your personal data. Should you have any questions, please email us at [contact@orionadvisors.com](mailto:contact@orionadvisors.com).

### 2 *What data privacy principles does the Company adhere to?*

- The Company will process all personal data in a lawfully, fair and transparent manner.
- The Company will only collect personal data where it is necessary
- For the Company to provide a service to you;
- For you to provide a service to the Company;
- For the Company to keep you informed of its products and services; or
- For the Company to comply with its legal and regulatory obligations.
- The personal data collected by the Company will be adequate, relevant and limited to what is necessary in relation to the specific purpose for which your data will be processed.
- The Company will take all reasonable steps to ensure that personal data is accurate and, where necessary, kept up-to-date.
- The Company will maintain personal data in a form that permits identification no longer than is necessary for the purposes for which the personal data has been collected for processing, in accordance with the Company’s record retention requirements as mandated by the FCA.
- The Company will hold and process personal data in a manner that ensures appropriate security.

# Orion Global Advisors UK Limited

- The Company will only share personal data where it is necessary to provide the agreed service or where it is necessary for the Company to comply with its legal and regulatory requirements.
- The Company will only utilise a service provider based outside of the EEA for the processing of personal data where this is strictly necessary to facilitate our services to you. In all cases, we will ensure service providers are fully compliant with GDPR ahead of transferring any personal data.

## **3 Information about visitors to the website**

- This policy applies to any information about visitors to our website; and
- individuals that sends us a message at the email address provided on the website.

## **4 The information we collect about you**

As a general rule, we do not collect or store any information about you from our website except only that information that you provide to us via email at the contact email address provided on our website.

It is our policy to not store or retain any information about you except that information that you send to us by email when you write to us and to the extent and for the time it is necessary for us to be able to contact you to provide any services to you in response to your request but you will be informed about what information will be retained and used by us and for what purpose, for example, we have to retain your contact details in order to be able to respond to your queries. Under the circumstances, we will hold your name and email address. This policy will provide you information about your rights and our obligations in respect of your personal data which we collect, retain or use.

## **5 What personal data does the Company collect and why?**

In the course of providing products/services to you, once we onboard you as our client, the Company may collect information that is considered personal information (e.g. name, contact details, address, passport number, driving licence).

As a client, contact or employee of the Company, we will require some personal information in order to verify your identity and have the applicable relationship with you. Some of this information may be required to satisfy legal obligations (e.g. to comply with obligations arising under the money laundering regulations whereas other information may be required in connection with the provision of services to you). The information collected will vary depending on the service the Company provides to you or you provide to the Company, but typically includes:

- Personal information: Such as your name, date of birth, passport number or national insurance number; and
- Contact information: Including your address, telephone number and email address.

## **6 *Cookies and other information-gathering technologies***

Our website uses cookies. Cookies are text files placed on your computer to collect standard Internet log information and visitor behaviour information. These cookies allow us to distinguish you from other users of the website which helps us to provide you with a good experience when you browse our website and also allows us to improve our site.

For more information on which cookies we use and how we use them, see our Cookies Policy.

## **7 *How we will use the information about you***

We only retain this information to allow us to provide the services requested. The relevant information is then used by us to communicate with you on any matter relating to the conduct of your instructions in general.

## **8 *Where does the Company store my personal data?***

The Company has comprehensive policies and procedures in place to ensure your personal data is kept safe and secure, with these including:

- Data encryption;
- Firewalls;
- Intrusion detection;
- 24/7 physical protection of the facilities where your data is stored (Google's UK data centres);
- Background checks for personnel that access physical facilities; and
- Security procedures across all service operation

## **9 *How we protect your information?***

We have put in place the following security procedures and technical and organisational measures to safeguard your personal information: the information you send to us via email arrives in an email box which is protected by password and only a limited number of employees have access to this email box.

We will use all reasonable efforts to safeguard your personal information. However, you should be aware that the use of the Internet is not entirely secure and for this reason we cannot guarantee the security or integrity of any personal information which is transferred from you or to you via the Internet.

## **10 Overseas transfers**

The information you provide may be transferred to countries outside the European Economic Area (EEA) that may not have similar protections in place regarding your data and restrictions on its use as set out in this policy. However, the Company will only utilise a service provider based outside of the EEA for the processing of personal data where this is strictly necessary to facilitate our services to you. In such situations, we will take steps to ensure adequate protections are in place to ensure the security of your information. And we will ensure service providers are fully compliant with GDPR ahead of transferring any personal data.

The EEA comprises the EU member states plus Norway, Iceland and Liechtenstein.

## **11 Access to your information and updating and correcting your information**

You have the right to request a copy of the information that we hold about you. If you would like a copy of some or all of your personal information, please send an email to [contact@orionadvisors.com](mailto:contact@orionadvisors.com) or send a letter to the Compliance Officer or Chief Operations Officer at Orion Global Advisors UK Limited, 2nd Floor, 100 Juxon House, St. Paul's Churchyard, EC4M 8BU, London, United Kingdom.

We want to ensure that your personal information is accurate and up to date. If any of the information that you have provided to OGAUKL changes, for example if you change your email address or name, please let us know the correct details by sending an email to the Information Officer at Orion Global Advisors UK Limited, 2nd Floor, 100 Juxon House, St. Paul's Churchyard, EC4M 8BU, London, United Kingdom. You may ask us, or we may ask you, to correct information you or we think is inaccurate, and you may also ask us to remove information which is inaccurate.

## **12 How long does the Company retain personal data?**

As a regulated entity, the Company is required to maintain its books and records for a prescribed period (5 years from either the ceasing of a business relationship, or, in the case of non-clients, from the making of a record – or alternatively, for 7 years, where specifically requested to do so by the FCA or any other regulator with jurisdiction over the Company). As such, information that falls in scope of either of these requirements is retained in line with the mandated timeframe.

Any information that is outside the scope of this requirement will be retained whilst relevant and useful, and destroyed where this ceases to be the case or where the data subject specifically requests this.

## 13 *How have I been categorised in accordance with GDPR?*

The GDPR requires the Company to inform you of the legal basis on which we maintain your personal data. Typically, the Company will reach out to you personally to confirm this; however, as a general rule the following is applicable:

- Clients – Information is maintained on the basis of contractual obligation and/or legitimate interests (where relevant);
- Service providers – Information is maintained on the basis of contractual obligations;
- Database/marketing contacts – Information is maintained on the basis of legitimate interests.

## 14 *What are my rights?*

Once you have provided your personal data to the Company, you have certain rights which apply, depending on your relationship with the Company, the information you have shared with us and the Company's legal and regulatory obligations.

- You have the right to request a copy of the information that we hold about you. If you would like a copy of some, or all, of your personal information, please email the Company at [contact@orionadvisors.com](mailto:contact@orionadvisors.com). The Company will provide this information to you within one month (with the ability to extend this by an additional two months where necessary), free of charge.
- You have the right to request that the information the Company holds about you is erased under certain circumstances including where there is no additional legal and/or regulatory requirement for the Company to retain this information.
- As a client, you have the right to request that any information the Company holds about you be provided to another company in a commonly used and machine-readable format, otherwise known as 'data portability'.
- You have the right to ensure that your personal information is accurate and up to date, or where necessary rectified. Where you feel that your personal data is incorrect or inaccurate and should therefore be updated, please contact the CCO/COO at [contact@orionadvisors.com](mailto:contact@orionadvisors.com)
- You have the right to object to your information being processed, for example for direct marketing purposes.
- You have the right to restrict the processing of your information, for example limiting the material that you receive or where your information is transferred.
- You have the right to object to any decisions based on the automated processing of your personal data, including profiling.
- You have the right to lodge a complaint with the Information Commissioner's Office if you feel that we have not processed your data in accordance with GDPR, any contractual agreements or this Privacy Notice.

## **15 *Changes to Privacy policy - will I be notified of changes to this policy?***

We keep our Privacy Policy under regular review. If we change our Privacy Policy we will post the changes on this page, and place notices on other pages of the website, so that you may be aware of the information we collect and how we use it at all times. This Privacy policy was last updated on May 25, 2018.

The Company may review and update this Privacy Notice from time to time. If the Company needs to make any material changes to how it collects, uses or shares your personal data it will inform you of these changes by our usual communication channels, including by email.

## **16 *Who should I direct questions to?***

We also welcome your views about our website and our Privacy Policy. If you have any questions, concerns or complaints about the practices contained within this document or how the Company has handled your data, please email: [contact@orionadvisors.com](mailto:contact@orionadvisors.com). Alternatively, you may write to Orion Global Advisors UK Limited at 2nd Floor, 100 Juxon House, St. Paul's Churchyard, EC4M 8BU, London, United Kingdom.

You also have the right to make a complaint in respect of the Company to the Information Commissioner's Office in the United Kingdom.

## **17 *Links to other websites***

Our website contains links to other websites. This Privacy Notice applies only to this website so when you access links to other websites you should read their own privacy policies.