

# GDPR Privacy Notice

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EDITION  
CAPITAL

October 2023

## Who we are

Edition Capital Investments Limited (Edition) is the Controller of the personal information you provide to us. If you have any questions about this Privacy Notice or the information we hold about you please contact us using the details set out below:

Edition Capital Investments Limited  
146-148 Clerkenwell Road, London, EC1R 5DG

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues. We would however appreciate the chance to deal with your concerns before you approach the ICO, so please contact us in the first instance.

## What types of information do we use?

We collect information in the course of providing our financial services to you. The information that we collect, use, store and about you are:

- Employment or work history/background;
- Information on trading or other financial activity;
- Financial information (financial position and history);
- Documentary data (can include passport or drivers licence or other forms of identification);
- Public records (or openly accessible data) such as the Electoral Register;
- Historical information i.e. previous names and addresses.

## Consequences of not providing some types of information

Where we need to collect your personal information by law, or under the terms of a contract we have with you, and you fail to provide that information when requested, we may not be able to provide the goods or services you asked for. In this case we may have to cancel the product or services but we will tell you if this is the case.

## How we will use your personal information

We only obtain, use and keep personal information where we need it for a specific purpose. We are only able to use your personal information if we have a proper legal reason or basis for doing so. This is called a legal basis and the regulations require that we have a legal basis so that your privacy is protected. Most commonly we will use your information in the following ways:

Purpose	Lawful basis for processing including our legitimate interests
To on-board you as a new customer	To fulfil our contract with you To fulfil our legal obligations to prevent financial crime
To manage your account	Necessary for our legitimate interests – to recover debts due to us
To monitor your investment on an on-going basis	To fulfil our contract with you
To meet our regulatory obligations to provide you with regular information about your investment	To fulfil our regulatory obligations
To contact you about other products and services we think you may be interested in	Necessary for our legitimate interests – to develop our products and services and grow our business
To use data to improve our website	Necessary for our legitimate interests – to understand how our customers interact with our website

## Marketing

We expect that we will only contact you where we believe we have a legitimate interest for doing so (see comments in section above regarding 'other products and services'). However should we intend to contact you for other reasons, we will always seek your consent to use your personal information for such purposes. We will very clearly explain why we are seeking your consent and ensure that you are provided with a simple method of providing this.

**You are free to change your mind at any time by requesting an opt out from promotional communication, whether that be for what we deem to be our legitimate interests or otherwise. In order to do so, please contact us at: [editionclientservices@editioncapital.co.uk](mailto:editionclientservices@editioncapital.co.uk).**

## Storing your information

As a financial services provider we will typically have a contract with you and will need to keep your personal information (updated to ensure accuracy) to fulfil our contract. We also need to comply with EU and UK law, which often requires us to keep certain records - which will include certain personal information - for several years. We will retain all of your data until 6 years after the fund in which you invested is closed or your investment is returned.

## Your rights

You are provided with a number of different rights under the data protection laws in relation to your personal information. These allow you:

- To access your information;
- To request we correct your information;
- To request that we erase your information;
- To object to the processing of your information;
- To request a restriction in the processing of your information;
- To request a transfer of your information; and
- To withdraw your consent.

If you wish to exercise any of these rights please contact Edition Capital Investments Limited at the address provided above, or at [editionclientservices@editioncapital.co.uk](mailto:editionclientservices@editioncapital.co.uk). Please note that you will not have to pay a fee to access your personal information or to exercise any of the other rights. We may, however, charge a reasonable fee if your request is clearly unfounded, repetitive or excessive or we may refuse to deal with your request. We may also need to seek further information from you to confirm your identity before we release any personal information. This does not affect your right to make a complaint.



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