



DowgateWealth

PRIVACY STATEMENT

Dear Client,

Dowgate Wealth Ltd. "Dowgate" is committed to your privacy and follows the General Data Protection Regulations (GDPR) when collecting your personal data. The purpose of this statement is to set out how we use your personal data and what your associated rights are under GDPR.

We will process any personal information provided to us or otherwise held by us relating to you in the manner set out in this Privacy Statement. Personal data is collected in various ways including:

- writing (including emails, application forms),
- via our website (the "Website"), using cookie technology
- telephone calls
- face to face meetings

By accepting this Privacy Statement you agree that you understand and accept the use of your personal information as set out in this statement. If you do not agree with the terms of this Privacy statement we will be unable to continue our relationship with you and will require your account to be closed.

Who we are

References in this Privacy Statement to Dowgate Wealth Ltd, relate to a Private Limited Company incorporated in England and Wales (Registration number 12221221). We control the ways your Personal Data is collected and the purposes for which your Personal Data is used by Dowgate, acting as the "data controller" for the purposes of applicable European data protection legislation.

Personal Data we collect

The data we collect will depend on our relationship with you, but in general the personal data we will require includes:

- Names
- Date of Birth
- Address
- Bank Account details
- Telephone number
- Email address
- National Insurance No (or equivalent depending on country)
- Employment information
- Financial Information

Protecting Your Personal Data

Your Personal Data is protected by law. The law states that we can only process your Personal Data when there is a genuine reason to do so and it must be one of the following:

- To fulfil any contract that we have with you
- We have a legal obligation
- Where you have consented to the processing
- When it is in our legitimate interest
- When it is in the public interest
- When it is in your vital interests

Why we process your Personal Data

What we do	How it's justified
Open client accounts	- Fulfilling contractual obligations - Legal/regulatory obligations
Manage client accounts: - Investment advice - Discretionary Management - Trade execution - Payments and withdrawals	- Fulfilling contractual obligations - Legal/regulatory obligations
Responding to any customer complaints	- Fulfilling contractual obligations - Legal/regulatory obligations
Prevent and detect improper use of accounts, including market abuse	- Legal/regulatory obligations
Prevention of crime Detect, investigate and report crime	- Legal/regulatory obligations
Ensure corporate governance and compliance to all legal and regulatory obligations. To run our business in a professional manner	- Legal/regulatory obligations
Corporate Broking contractual arrangements	- Fulfilling contractual obligations - Legal/regulatory obligations
To exercise our rights set out in agreements or contracts	- Fulfilling contractual obligations - Legal/regulatory obligations

If you choose not to provide your Personal Data it may prevent us from meeting legal obligations and/or fulfilling a contract. Not providing your Personal Data may mean we are unable to provide you with products or services.

Recipients of Personal Data

Dowgate shares your data with the following third-party service providers. The data storage and processing systems are protected by access controls, to minimise any risk to the integrity or security of your personal data and is stored in servers in the EU

- Fitzrovia IT Limited
- KYC 360
- ID-Pal
- Teleware
- Regulatory Bodies (upon request)
- Evorio IT Consulting
- Global Prime Partners
- Mimecast

Information Collected

The information and data about you which we may collect, use and process includes the following:

- Information that you provide to us by filling in application forms or any other information you submit to us via written communication (including emails)
- Records of correspondence, whether via the Website, email, telephone or other means
- Details of the transactions you carry out with us, whether via telephone or other means
- Details of your visits to the Website including, but not limited to, traffic data, location data, weblogs and other communication data

Data Transfer Outside the EEA

We will only transfer your Personal Data outside of the EEA where:

- You have given your explicit consent, or
- It is necessary for us to set up or fulfil a contract you have entered into with us; or
- To comply with a legal duty or obligation

If we do transfer your Personal Data outside of the EEA, we will take measures to ensure it is protected to the same standards as it would be within the EEA by relying on one of the following:

- The country that is receiving your Personal Data has been found by the European Commission to offer the same level of protection as the EEA. More information can be found [on the European Commission Justice website](#).
- We will use contracts that require the recipient to protect your Personal Data to the same standards as it would be within the EEA
- Where the transfer is to the USA and the recipient is registered with Privacy Shield. Privacy Shield is a framework that ensures Personal Data is protected to a level approved by the EU. Read more about Privacy Shield [on the European Commission Justice website](#).

In some instances we may be compelled by law to disclose your Personal Data to a third party and may have limited control over how it is protected by that party.

How long we keep your Personal Data

Whenever your data is kept by Dowgate we will ensure that it is appropriately protected and only used for acceptable purposes. We will keep your data for a period of five years from the date Dowgate ceases to carry on business with you (i.e account closure).

Your rights over your Personal Data

We will assist you if you choose to exercise any of your rights over your Personal Data, including:

- Lodging a complaint with any relevant Data Protection Authority
- Access to your Personal Data that we hold or process
- Correction of any Personal Data that is incorrect or out of date
- Erasure of any Personal Data that we process
- Restrict processing of your Personal Data in certain circumstances

For more information on these rights you can contact compliance@dowgate.co.uk

Complaints

Should you have any complaints about the processing and retention of your personal data, please in the first instance contact compliance@dowgate.co.uk or call us on 01293 517 744. In addition under GDPR, you have the right to lodge a complaint with the Supervisory Authority, the Information Commissioner's Office (ICO) who are the national authority responsible for the protection of personal data. A complaint can be made to the ICO via their website: ico.org.uk or through their helpline 0303 123 1113

Changes to our Privacy Statement

We may update this policy from time to time and changes will be published on our website: <http://www.dowgatewealth.co.uk/> and previous versions will also remain on the website. We will notify you of any material changes via email (where possible) but recommend you check this statement regularly, so that you are aware of any changes

If you decline to accept the changes to the Privacy Statement, we may not be able to continue to provide some or all products and services.

Contacting us

If you have any concerns, or would like more detail about how we process your Personal Data, you can contact us at compliance@dowgate.co.uk or call 0203 903 7723

Dowgate Wealth Ltd

01/03/2021