

Varramore Partners

Data Protection Privacy Notice



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The scope and purpose of this Privacy Notice

This Privacy Notice explains how Varramore Partners Limited (“Varramore”, “we”, “us”, “our”), collects, uses, shares and otherwise processes your Personal Data in connection with your relationship with us as a Varramore client, acting for a client or being generally interested in our services and our publications in accordance with applicable data privacy laws including, but not limited to, the United Kingdom’s Data Protection Act 2018 (“UK DPA”).

About us

Varramore Partners Limited is a boutique professional services firm providing bespoke governance, risk, compliance, accounting, finance and tax services to investment firms that are authorised and regulated by the Financial Conduct Authority (“FCA”), are seeking to become authorised and regulated by the FCA or wish to operate under the regulatory umbrella of an investment firm that is authorised and regulated by the FCA.

Personal Data

The term “Personal Data” as used in this Privacy Notice means any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier. This definition provides for a wide range of personal identifiers to constitute personal data, including name, date of birth, residential address, identification number, location data or online identifier. Personal Data does not include data from which you can no longer be identified such as anonymised aggregate data.

What information do we collect about you, how do we collect it and what do we use it for?

The kinds of Personal Data we may collect include your contact details (such as your address, email address and telephone number) and other information such as your job title. Where you are a client of Varramore, we may need to verify your identity. In such cases, we may collect identification verification information (such as passport and/or driving license details and utility bills). Additional information may also be collected for clients receiving accounting, finance and tax services from us (such as your Unique Tax Reference (“UTR”) and National Insurance (“NI”) Number). In most cases, we will collect the Personal Data directly from you but may also obtain it from other sources.

We will process your Personal Data if and to the extent applicable law provides us with lawful basis to do so. Therefore, we will only process your Personal Data if:

- you have consented to us doing so (consent);
- we need it to perform the contract we have entered into with you (contract);
- we need it to comply with a legal obligation (legal obligation);
- we need it to protect someone’s life (vital interests);
- we need it to perform a task in the public interest or for your official functions, and the task or function has a clear basis in law (public task); or
- we (or a third party) have a legitimate interest which is not overridden by your interests or fundamental rights and freedoms (legitimate interest)¹.

Given the nature of our business, it is considered unlikely that the lawful basis for us process your Personal Data will be by reason of vital interests or public task.

We will use your Personal Data to deliver services to you and/or to work or act for you. We may also use your Personal Data to inform you about us and our services.

Please note that we may use or disclose Personal Data if we are required by law to do so or if we reasonably believe that use or disclosure is necessary to protect our rights and/or to comply with judicial or regulatory proceedings, a court order or other legal process.

What might we need from you?

We may need to request specific information from you to help us confirm your identity and ensure your right to access Personal Data (or to exercise any of your other rights). This is another appropriate

¹ Legitimate interests may include the provision of services by us, administrative or operational processes within Varramore and direct marketing activities.

security measure to ensure that Personal Data is not disclosed to any person who has no right to receive it.

Accuracy of information

It is important that the Personal Data we hold about you is accurate and current. Please let us know if your Personal Data changes during your relationship with us.

What if you do not provide the personal data we request?

It is in your sole discretion to provide Personal Data to us. If you do not provide us with all or some of the Personal Data we request, we may not be able to accept an engagement from you, to provide all or some of our services, to enter into a contract with you or to send you information about us (e.g. marketing materials).

Change of purpose and anonymisation

We will only use your Personal Data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason which is compatible with the original purpose. If we need to use your Personal Data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so. In some circumstances we may anonymise your Personal Data so that it can no longer be associated with you, in which case it is no longer Personal Data.

With whom will we share your information?

When using your Personal Data for the purposes and on the legal basis described above, we may share your Personal Data with other service providers we work with. We may also have to share your Personal Data with regulators, public institutions, courts or other third parties. We may have to transfer your Personal Data from the United Kingdom ("UK") to a third party outside of the UK and in a jurisdiction not being subject to an adequacy decision of the UK. We will always ensure that there is a legal basis and a relevant safeguard method for such data transfer so that your Personal Data is treated in a manner that is consistent with and respects the UK DPA and other data privacy laws.

Your rights in relation to your information

You have rights as an individual which you can exercise under certain circumstances in relation to your Personal Data that we hold. These rights are to:

- request access to your Personal Data (commonly known as a "data subject access request") and request certain information in relation to its processing;
- request rectification of your Personal Data;
- request the erasure of your Personal Data;
- request the restriction of processing of your Personal Data; and
- object to the processing of your Personal Data.

You may also have the right to make a complaint to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.

Right to withdraw consent

In case you have provided your consent to the collection, processing and transfer of your Personal Data, you have the right to fully or partly withdraw your consent. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose(s) to which you originally consented unless there are compelling legitimate grounds for further processing which override your interests, rights and freedoms or for the establishment, exercise or defence of legal claims. In case we processed your Personal Data for direct marketing purposes, you have the right to object at any time, in which case we will no longer process your Personal Data for such marketing purposes.

How long will we retain your information?

We will only retain your Personal Data for as long as necessary to fulfil the purposes for which it was collected and processed, including for the purposes of satisfying any legal, regulatory, accounting or reporting requirements. To determine the appropriate retention period for your Personal Data, we will consider the amount, nature, and sensitivity of the Personal Data, the potential risk of harm from unauthorised use or disclosure of your Personal Data, the purposes for which we process your Personal

Data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances we may anonymise your Personal Data so that it can no longer be associated with you, in which case it is no longer Personal Data.

Upon expiry of the applicable retention period we will securely destroy your Personal Data in accordance with applicable laws and regulations.

Fees

You will in general not have to pay a fee to exercise any of your individual rights mentioned in this Privacy Notice. However, we may charge a reasonable fee if your request to exercise your individual rights is manifestly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

Changes to this Privacy Notice

We reserve the right to update this Privacy Notice at any time, and we will make an updated copy of such Privacy Notice available on our website.

Further information

If you have any queries, questions, concerns or require any further information in relation to the Privacy Notice or you wish to exercise any of your rights, please do not hesitate to [Contact Us](#).

