

Gradient Advisory Corporate Services Limited Privacy Policy

Please read the following information carefully. This privacy policy contains information about what data we collect and store about you and why. It also tells you who we share this information with, the security mechanisms we have put in place to protect your data and how to contact us if you have a complaint.

The type of personal information we collect

Gradient Advisory Corporate Services Limited collects, uses and is responsible for personal data about you. When we do this, we are a 'controller' of data for the purposes of the General Data Protection Regulation (GDPR).

"Personal data" is information that identifies you as an individual or relates to an identifiable individual.

We will only use your personal data when the law allows us to and we will not sell, trade or otherwise deal with your personal data in any way that contravenes this Privacy Policy (as may be updated from time to time).

When carrying out activities we collect and process information, which includes:

- Contact details that enable us to communicate with you
- Depending on the activity, this may include contact details, facts about you and financial information to enable confirmation of your identity and to conduct anti-money laundering checks
- Details to support reporting to the authorities
- Financial information required to transact with you

How your personal data is collected

We collect personal data from you:

- directly, when you enter or send us information, such as when you contact us, and

- indirectly, such as your browsing activity while on our website, we will usually collect information indirectly using the technologies to support the functioning of our websites and applications

How and why we use your personal information

We can only use your personal data if we have a proper reason e.g.

- where you have given consent
- to comply with our legal and regulatory obligations
- for the performance of a contract with you or to take steps at your request before entering into a contract or
- for our legitimate interests or those of a third party

The information may be used for legal and regulatory compliance purposes, including as necessary to respond to governmental, regulatory or law enforcement agency requests; to ensure the continuing security and integrity of our systems, business dealings, reputation or the security and reputation of Gradient Advisory Corporate Services Limited and its staff; to identify misuse of our systems and any fraud or other illegal or unlawful activity or any other activity which is or may be contrary to our legal and regulatory compliance obligations.

Who we share your personal information with

We will share personal information with the bodies that regulate us, HMRC and law enforcement agencies, financial regulators and other relevant regulatory authorities if required by applicable regulations or law. We will not share your personal information with any other third parties without your consent unless you specifically request us to do so.

How long your personal information will be kept

We hold your personal data in accordance with legal and regulatory requirements for no longer than reasonably necessary to fulfil the purpose for which it was collected. Once those purposes have been completed which shall hold them for no longer than any period required by law.

Transfer of your information out of the UK and the EEA

Countries outside the UK have differing data protection laws, some of which may provide lower levels of protection of privacy.

It may sometimes be necessary for us to transfer your personal data to countries outside of the UK. In those cases, we will comply with applicable UK laws designed to ensure the privacy of your personal data. We may transfer your personal information outside the UK and the European Economic Area (EEA).

Under data protection law, we can only transfer your personal data to a country or international organisation outside the UK where:

- the UK government or, where the EU GDPR applies, the European Commission has decided the particular country or international organisations ensures an adequate level of protection of personal data (known as an 'adequacy decision')
- there are appropriate safeguards in place, together with enforceable rights and effective legal remedies for data subjects, or
- a specific exception applies under data protection law

Where we transfer your personal data outside the UK, we do so based on an adequacy regulation or (where this is not available) legally approved standard data protection clauses. If we cannot or choose not to continue to rely on either of those mechanisms at any time, we will not transfer your personal data outside the UK unless we can do so based on an alternative mechanism or exception provided by the UK data protection law and reflected in an update to this policy.

Your data protection rights

Under data protection law, you have rights including:

Right to be informed

- how and why the data is used
- for how long it will be kept
- who else it will be shared with



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Right of access

- to ask for access to the personal data that we hold
- to get a copy of personal data

Right to rectification

- to ask to correct any errors in the personal data or make records complete if data is missing

Right to erasure

- to ask to delete the personal data, but only where:
- the data is no longer necessary in relation to the purpose for which it was collected or otherwise processed, or
- where consent is withdrawn, or
- where there is no legal basis for the processing, or
- there is a legal obligation to delete data

Right to restrict processing

- to ask to restrict or suppress processing of personal data e.g. where there is a complaint about accuracy

Right to data portability

- in limited circumstances, receive or ask for personal data to be transferred to a third party in a structured, commonly used, and machine-readable format.

Right to object

- to ask to stop processing personal data in certain circumstances

Rights on automated decision-making

- the right not to be subject to decisions based solely on automated processing, including profiling, except where necessary for entering, or performing, a contract, it is based on the data subject's explicit consent and is subject to safeguards; or is authorised by law and is also subject to safeguards

You are not required to pay any charge for exercising your rights.

Please contact us, if you wish to make a request, at:

Phone number: +44 (0)20 3983 0660

E-mail: phil@gradientadvisory.com

Safeguarding measures

We take your privacy seriously and take every reasonable measure and precaution to protect and secure your Personal Data. We work hard to protect you and your information from unauthorised access, alteration, disclosure or destruction and have security measures in place.

Cookies

Cookies are small text files which are transferred from our website and stored on your device to help the site provide a better user experience.

Please check this website for guidance on how to manage cookies on every browser

<https://allaboutcookies.org/how-to-manage-cookies>

How to complain

If you have any concerns about our use of your personal information, you can make a complaint to us at:

Email: phil@gradientadvisory.com

Phone number: +44 (0)20 3983 0660

You can also complain to the ICO if you are unhappy with how we have used your data.

Details about the Information Commissioner and how to make a complaint can be found on ICO website: <https://www.ico.org.uk>, helpline number: +44 (0)30 3123 1113.

Changes to our Privacy Policy

Any changes we may make to our Privacy Policy in the future will be posted on this page and, where appropriate, notified to you by email.