

1. Overview

Metropolis Capital Limited (“Metropolis”) is a fund management company. Its activities are described on its website www.metropoliscapital.co.uk. Metropolis is a private limited company registered in England & Wales under number 7244251.

The registered address for this company is First Floor, Amersham Court, 154 Station Road, Amersham, HP6 5DW, United Kingdom.

Metropolis complies with data protection legislation, which regulates the processing of data and ensures that your data is processed fairly and lawfully, is kept secure and only that data necessary for any processing is kept.

This statement summarises the personal data we may collect, how we may use that data, how we ensure the information we have is kept accurate and how you can request access, deletion, rectification, restriction, transfer and withdraw consent (where applicable) and make a complaint. We primarily collect data to provide you with services you have requested. We may update the privacy statement from time to time and will keep the current version on our website. This privacy statement is subject to our terms and conditions which are found on our website.

2. What Information do we collect and how is this collected?

We only collect personal information if we have your permission, or we have reasonable commercial reasons for doing this, such as to supply you with services. We will aim to collect the minimum amount of information we need.

For employees we keep personal data needed to recruit you, pay you, provide company benefits and to fulfil our legal obligations.

Where we share personal data with a third party, we will ensure the information is shared under a service agreement and that the provider is also GDPR compliant. We do not share any personal data for marketing purposes.

3. Cookies

We use cookies to monitor web usage. Cookies are written to the hard drive of a web user, they contain no personal information about the website user and only keep a record of the sites visited and actions on the web site. Some cookies expire after the browser is closed whilst others stay on the hard drive. They are of standard use across many websites.

Most browsers offer you ways to control or block cookies should you wish to. These browser controls will usually be found in the “options” or “preferences” menu in your toolbar. The “help” portion of the toolbar on most browsers will tell you how to stop or manage cookies. For further information on cookies visit aboutcookies.org or the Information Commissioner’s webpage on cookies ico.org.uk/for-the-public/online/cookies/

4. Legal basis for processing data

We will only use personal information for the purpose it was collected. Should we ever wish to use it for another purpose we will contact you first asking you for your consent. We primarily use data to communicate with you and to deliver the service you have requested or to meet legal, regulatory and compliance requirements.

5. How long do we keep your data for?

Data is not kept any longer than is required for the purposes of the processing or to comply with the law. As we collect data for many different purposes there is not a single retention period for all data. We instead carefully assess the length of time to retain data according to the processing purpose and to comply with our legal obligations. When data is no longer required for the purposes of the processing it is securely removed from our systems.

6. Security and confidentiality

Metropolis takes commercially reasonable physical, technical and administrative measures to protect personal information from theft, misuse or accidental destruction and to keep it confidential. We aim to protect personal information but cannot provide a 100% guarantee of security. All employees and data processors (third parties who process data on our behalf) who access your data are obliged to keep the information confidential and secure and not to use it for any other purpose other than that they are contracted to carry out for us.

7. Transfer of data to third parties

We do not share any data with third parties. However, we will share data with public or regulatory authorities where required by law or to enforce our terms of service. Your data will be processed fairly, lawfully and securely in the UK and will only be transferred outside of the European Union when there is protection in place for your rights and when the data will be kept secure.

8. Withdrawal of consent

When you have provided consent, if you should wish to withdraw that consent, you can let us know by sending an email to investorservices@metropoliscapital.co.uk and we will remove your data from our systems.

9. Restriction of liability

Our website links to other websites. Metropolis is not responsible for the privacy policies of those websites nor does it have or accept any liability for their content.

10. Legal information and how to contact us

You have the right to see, erase and correct data we hold, the right to restrict the processing we do, and the right to object to it and to have your data transferred to a third party. If you wish to do any of these things or have any questions about how we use your data, or wish to make a complaint about any privacy issues, please contact:

privacy@metropoliscapital.co.uk

or write to:

Metropolis Capital Limited
First Floor
Amersham Court
Amersham
Buckinghamshire
HP6 5DW
United Kingdom

Requests will be dealt with and responded to within a reasonable period, and no longer than 30 days. If you are not satisfied with the way your request was handled, you have the right to lodge a complaint with the supervisory authority – details of which are given below:

Information Commissioner's Office
<https://ico.org.uk/concerns/>
Telephone: +44 (0)30 3123 1113

Date: 16 May 2018