

Website Privacy Notice (GDPR compliant)

Last Updated: Dec 2021

Altana Wealth Limited ("**Altana Wealth**") respects your right to privacy. This Privacy Notice explains who we are, how we collect, share, and use personal information about you, and how you can exercise your privacy rights.

If you have any questions or concerns about our use of your personal information, then please contact us using the contact details provided at the bottom of this Privacy Notice.

What does Altana Wealth do?

Altana Wealth is an investment management firm. We are established in the UK and Monaco.

For more information about Altana Wealth, please see the ("About Us") section of our website at <https://www.altanawealth.com/about-us-1>

What personal information does Altana Wealth collect and why?

The personal information that we may collect about you broadly falls into the following categories:

Information that you provide voluntarily

You may be asked on certain parts of our website to provide personal information voluntarily: for example, we may ask you to provide your contact details in order to communicate with you as a client, a potential client, associate, or other relevant person such as a beneficial owner or authorised representative.

When you are opening an investor account we may ask for information, including:

- copies of your passport, driving licence, national insurance number or other proof of identity;
- personal details including home address, date of birth;
- your business name and contact information;
- financial information (including bank or building society account details,);
- information about your directors, partners, members, shareholders, beneficial owners and guarantors;
- information about the nature of your business and the assets you hold and any other financial indebtedness or security that you have entered into with third parties;
- education and qualifications;
- current and prior employment details;
- professional body memberships;

- electoral register information;
- fraud prevention information; and
- passwords and answers to security questions.

We may also keep copies of our correspondence with you.

The personal information that you are asked to provide, and the reasons why you are asked to provide it will be made clear to you at the point we ask you to provide your personal information, but include:

- facilitating the opening of investor accounts and the management and administration of investor holdings on an on-going basis including the processing of redemption, conversion, transfer and additional subscription requests and the payment of distributions;
- updating and maintaining investor records and fee calculation;
- circulating periodic reports relating to Altana Wealth;
- developing and improving our services, products and business, including analysing and improving our credit risk models and our investor offering;
- transferring money;
- carrying out mandatory or other regulatory checks;
- complying with our legal and regulatory obligations;
- carrying out statistical analysis and market research and testing;
- contacting you about products and services which we think may interest you (at all times taking into consideration your rights at law including your right to opt-out from receiving marketing from us);
- verifying your identity and the other information you have provided to us, including your bank account information and (if relevant) the identity of your business associates;
- updating the records we hold about you from time to time;
- recording, maintaining, storing and using recordings of telephone calls that the investor makes to and receives from Altana Wealth, the Administrator, or the Investment Manager and their delegates or duly appointed agents and any of their respective related, associated or affiliated companies for (i) processing and verification of instructions, (ii) investigation and fraud prevention purposes, (iii) for crime detection, prevention, investigation and prosecution, (iv) to enforce or defend Altana Wealth and its affiliates' rights or to comply with any legal obligation imposed on Altana Wealth, (v) to pursue Altana Wealth's legitimate interests in relation to such matters or (vi) where the processing is in the public interest;

- monitoring and recording calls for quality, business analysis, training and related purposes in order to pursue the legitimate interests of Altana Wealth to improve its service delivery;
- to disclosing information to other third parties such as service providers of Altana Wealth, auditors, regulatory authorities and technology providers;
- retaining AML and other records of individuals to assist with the subsequent screening of them by the Administrator including;

Criminal Convictions data

We will also process any personal data relating to any criminal convictions you may have. This information is necessary for preventing fraud, complying with our legal obligations, managing risks and deciding whether you are a suitable investor for Altana Wealth.

Information that we collect automatically

When you visit our Website, we may collect certain information automatically from your device. In some countries, including countries in the European Economic Area and in the UK, this information may be considered personal information under applicable data protection laws.

Specifically, the information we collect automatically may include information like your IP address, device type, unique device identification numbers, browser-type, broad geographic location (e.g. country or city-level location) and other technical information. We may also collect information about how your device has interacted with our Website, including the pages accessed and links clicked.

Collecting this information enables us to better understand the visitors who come to our Website, where they come from, and what content on our Website is of interest to them. We use this information for our internal analytics purposes and to improve the quality and relevance of our Website to our visitors.

Some of this information may be collected using cookies and similar tracking technology, as explained further under the heading "Cookies and similar tracking technology" [\[link\]](#) below.

Information that we obtain from third party sources

When we accept you as a client, we may collect further information about you from third party sources (including credit reference agencies, fraud prevention agencies, insurers, debt brokers, public information sources such as Companies House or Government or law enforcement agencies or information from social media sites which is relevant to your professional activities) but only where we have checked that these third parties either have your consent or are otherwise legally permitted or required to disclose your personal information to us.

The types of information we collect from third parties may vary depending on the service we are offering you. They may include your credit and insurance history, and information to verify your identity. We use the information we receive from these third parties to maintain and improve the accuracy of the records we hold about you, to ensure that the products we offer you are suitable for your particular circumstances, and to carry out anti-money laundering checks and related actions to meet any legal obligations imposed on the Company relating to the prevention of fraud, money laundering, terrorist financing, bribery, corruption, tax evasion

and to prevent the provision of financial and other services to persons who may be subject to economic or trade sanctions, on an on-going basis.

Who does Altana Wealth share my personal information with?

We may disclose your personal information to the following categories of recipients:

- to our **group companies, third party services providers and partners** who provide data processing services to us (for example, to support the delivery of, provide functionality on, or help to enhance the security of our website), or who otherwise process personal information for purposes that are described in this Privacy Notice or notified to you when we collect your personal information.
- to any **competent law enforcement body, regulatory, government agency, court or other third party** where we believe disclosure is necessary (i) as a matter of applicable law or regulation, (ii) to exercise, establish or defend our legal rights, or (iii) to protect your vital interests or those of any other person;
- to an actual or **potential buyer** (and its agents and advisers) in connection with any actual or proposed purchase, merger or acquisition of any part of our business, provided that we inform the buyer it must use your personal information only for the purposes disclosed in this Privacy Notice;
- to any **other person with your consent** to the disclosure.

Legal basis for processing personal information

Our legal basis for collecting and using the personal information described above will depend on the personal information concerned and the specific context in which we collect it.

However, we will normally collect personal information from you only (i) where we need the personal information to perform a contract with you, (ii) where the processing is in our legitimate interests and not overridden by your rights, or (iii) where we have your consent to do so. In some cases, we may also have a legal obligation to collect personal information from you.

If we ask you to provide personal information to comply with a legal requirement or to perform a contract with you, we will make this clear at the relevant time and advise you whether the provision of your personal information is mandatory or not (as well as of the possible consequences if you do not provide your personal information).

If we collect and use your personal information in reliance on our legitimate interests (or those of any third party), this interest will normally be to operate our platform and communicating with you as necessary to provide our services to you and for our legitimate commercial interest, for instance, when responding to your queries, improving our platform, undertaking marketing, or for the purposes of detecting or preventing illegal activities. We may have other legitimate interests and if appropriate we will make clear to you at the relevant time what those legitimate interests are.

In relation to special category personal information and personal information relating to criminal allegations, the additional legal bases for processing under Article 9 and 10 of the GDPR and section 10 of the Data Protection Act 2018 include: processing is necessary for the purposes of the prevention or detecting of an unlawful act (see paragraph 10 of Schedule 1 to the Data Protection Act 2018); processing is necessary for the purposes of complying with, or assisting other persons to

comply with a regulatory requirement (see paragraph 12 of Schedule 1 to the Data Protection Act 2018); or (where applicable and appropriate) the data subject has given explicit consent to the processing.

If you have questions about or need further information concerning the legal basis on which we collect and use your personal information, please contact us using the contact details provided under the "How to contact us" heading below

<https://www.altanawealth.com/contact>

Cookies and similar tracking technology

We use cookies and similar tracking technology (collectively, "**Cookies**") to collect and use personal information about you. For further information about the types of cookies we use, why, and how you can control cookies, please see our cookie notice.

<https://www.altanawealth.com/cookie-policy>

How does Altana Wealth keep my personal information secure?

We use appropriate technical and organisational measures to protect the personal information that we collect and process about you. The measures we use are designed to provide a level of security appropriate to the risk of processing your personal information.

International data transfers

Your personal information may be transferred to, and processed in, countries other than the country in which you are resident. These countries may have data protection laws that are different to the laws of your country.

It is important to us to protect your personal information. We therefore take all reasonable legal, technical and organisation measures to ensure that your personal information is kept safe. We aim to ensure that appropriate security measures are taken which are comparable to and of the same standard as the protections afforded to individuals in the UK and the European Economic Area.

Data retention

We retain personal information we collect from you where we have an ongoing legitimate business need to do so (for example, to provide you with a service you have requested or to comply with applicable legal, tax or accounting requirements).

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymise it or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

Your data protection rights

You have the following data protection rights:

If you wish to **access, correct, update or request deletion** of your personal information, you can do so at any time by contacting us using the contact details provided under the "How to contact us" heading below

<https://www.altanawealth.com/contact>

In addition, you can **object to processing** of your personal information, ask us to **restrict processing** of your personal information or **request portability** of your personal information. Again, you can exercise these rights by contacting us using the contact details provided under the "How to contact us" heading below

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You have the right to **opt-out of marketing communications** we send you at any time. You can exercise this right by clicking on the "unsubscribe" or "opt-out" link in the marketing e-mails we send you. To opt-out of other forms of marketing (such as postal marketing or telemarketing), then please contact us using the contact details provided under the "How to contact us" heading below

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- Similarly, if we have collected and process your personal information with your consent, then you can **withdraw your consent** at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal information conducted in reliance on lawful processing grounds other than consent.
- You have the **right to complain to a data protection authority** about our collection and use of your personal information. For more information, please contact your local data protection authority.

We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws.

Updates to this Privacy Notice

We may update this Privacy Notice from time to time in response to changing legal, technical or business developments. When we update our Privacy Notice, we will take appropriate measures to inform you, consistent with the significance of the changes we make. We will obtain your consent to any material Privacy Notice changes if and where this is required by applicable data protection laws.

You can see when this Privacy Notice was last updated by checking the "last updated" date displayed at the top of this Privacy Notice.

How to contact us

If you have any questions or concerns about our use of your personal information, please contact us using the following details

<https://www.altanawealth.com/contact>

The data controller of your personal information is Altana Wealth Limited