



Privacy Notice

1 Data Protection Requirements

Dowgate Capital Ltd is committed to protecting your personal information and respecting your privacy. All firms are required to comply with legislation should they process personal data which is the Data Protection Act (DPA) 2018 and the UK General Data Protection Regulation (GDPR).

2 What is Personal Data?

The terms 'personal information' or 'personal data' are interchangeable and means any information from which means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

3 Who we Are

Dowgate Capital is a private limited company incorporated in England registration number 02474423. We control the ways your Personal Data is collected and the purposes for which your Personal Data is used by acting as the "data controller" for the purposes of the Data Protection Act 2018. This notice confirms how we comply with the legal requirements.

4 Types of 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 but not limited to the following and we collect your information either in writing, in person, via our client website, or by telephone.

- Personal Information such as name, date of birth, photographs, identification numbers, etc
- Contact information such as email addresses, telephone numbers, postal addresses, etc
- Financial Information such as bank account details, investment accounts, etc
- Sensitive Information such as details in respect of any vulnerable conditions as applicable.

5 Sharing your personal data

So that we may provide you with investment services we will share your personal data with third parties such as:

- Regulatory and Law enforcement bodies, upon request
- Custodians
- Other financial firms in respect of transfers for instance
- Persons who you have provided authority through a third party mandate
- Information Technology firms in respect of storage for instance
- Exchanges and markets such as London Stock Exchange
- Credit Reference agencies
- Government agencies such as HMRC

6 Storing your personal data

Your personal data will be stored on servers within the United Kingdom. We will not ordinarily systematically transfer data outside of the European Economic Area (EEA) but will ensure there is adequate protection in place should we make a transfer and will gain consent for any transfer.

7 Lawful Basis

Dowgate may only process your personal data with a valid 'Lawful Basis'. There are six lawful bases for processing which are consent, contract, legal obligation, vital interests, public task, and legitimate interests.

Dowgate will process your personal data using the lawful bases of consent, contract, legal obligation, and legitimate interests. We may also process special category data including personal sensitive data and in doing use the lawful basis of contract and the condition that the processing is necessary for the performance of a contract to which you are party.

Dowgate will process and retain your personal data for specific 'purposes' which are aligned to the lawful bases, which are to:

- Open your investment accounts by using the contract lawful basis and use the legal lawful basis to fulfil requirements relating to mitigating financial crime such as fraud and money laundering.
- Manage your investment accounts by using the contractual and legal lawful bases to ensure your portfolio remains within your investment objectives and risk profile, and with consideration to any changes to your personal circumstances.
- Monitor your investment accounts by using the legal lawful basis to fulfil requirements relating to mitigating financial crime such as fraud and money laundering.
- Provide you with information about your investment accounts by using the consent and legal lawful bases to provide you with contract notes, statements, and any other information in relation to your account such as changes to our Terms.
- Contact you about other products or services you may be interested in and use the legitimate interest's lawful basis for this purpose.
- Use data to improve our website and use the legitimate interest's lawful basis for this purpose.

8 Data Protection Rights

Under data protection law, you have rights including:

- **Your right of access** - You have the right to ask us for copies of your personal information.
- **Your right to rectification** - You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.
- **Your right to erasure** - You have the right to ask us to erase your personal information in certain circumstances.
- **Your right to restriction of processing** - You have the right to ask us to restrict the processing of your personal information in certain circumstances.
- **Your right to object to processing** - You have the the right to object to the processing of your personal information in certain circumstances.
- **Your right to data portability** - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

9 Changes to our privacy notice

From time to time, we may amend our privacy notice of which the latest version will be available on our website. We will notify you and gain consent should we process your personal data for different purposes.

10 Retaining your personal data

Dowgate will only retain your personal data for as long as necessary but are also required to retain personal data for various time periods to fulfil regulatory obligations and will use the legal and legitimate lawful bases for this purpose.

11 How to enquire or make a complain

If you have any concerns about our use of your personal information, please contact Dowgate's Compliance Officer. You may withdraw your consent for us to process your personal data any time.

Dowgate
15 Fetter Lane
London
EC4A 1BW

Call: +44 020 3903 7715
Email: compliance@dowgate.co.uk

You can also complain to the Information Commissioner's Office (ICO) if you are unhappy with how we have used your data. The ICO's postal address:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Helpline number: 0303 123 1113
ICO website: www.ico.org.uk