



PRIVACY NOTICE

AND

COOKIE POLICY

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INTRODUCTION

Sanford DeLand respects the privacy of those with whom it has dealings and is committed, at all times, to protecting personal data.

This privacy notice and cookie policy contains information about who we are and how and why we collect, store, use and share your personal data when you interact with us.

When we collect, use, or share your personal data, we are subject to applicable data protection laws including the General Data Protection Regulation and are responsible for that personal data as a data processor or data controller. This notice will also inform you about your privacy rights and how the law protects you.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

1. IMPORTANT INFORMATION AND WHO WE ARE

Sanford DeLand is a trading name of Sanford DeLand Asset Management Limited, a company registered in England and Wales (company number 07197573) with registered office at **7 Park Row, Leeds LS1 5HD**. Where we refer to "Sanford DeLand", "we", "us" or "our" in this privacy notice, we are referring to Sanford DeLand.

If you have any questions about this privacy notice, including any requests to exercise your legal rights, please write to Sanford DeLand at the above address.

We hope that you will approach us to resolve any query or concern you might have about our use of your personal data. However, you have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk).

Changes to the Privacy Notice and Cookie Policy

This policy was last reviewed and updated on 27 April 2023.

We may change this privacy notice from time to time and we will inform you when those changes may affect you in a material way.

Third-party Links

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements or their data privacy arrangements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

2. THE DATA WE COLLECT

Typically, but see below, we only collect personal data (names and e-mail addresses) to enable us to provide Fact Sheets on request. We do not gather personal data for the purpose of investment. Instead, should instructions from investment advisers and introducers be received, we will pass these to the Authorised Corporate Director, ConBrio Fund Partners Limited, which is a data controller and responsible for its own data privacy arrangements. Should such instructions contain personal data, we will not retain any copy.

"Personal data" means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

Your relationship and dealings with us will dictate the amount and type of information we collect and hold about you and so not all of the below list will necessarily apply to you, for example if you subscribe to our Fact Sheets, we will hold your name and email address:

- Marketing and Communications Data includes your preferences in receiving any marketing from us and/or our third parties and your communication preferences.
- Identity Data includes first name, maiden name, last name, username or similar identifier.
- Contact Data includes email address, home address, email address and telephone numbers.

3. HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

Where we need to comply with a legal or regulatory obligation.

Generally, we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by [contacting us](#).

Purposes for which we will use your personal data

We have set out below a description of all the ways we may use your personal data, and, where we do so, which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful purpose depending on the specific reason for which we are using your data. Please [contact us](#) if you need details about the specific lawful purpose we are relying on to process your personal data where more than one ground has been set out in the table below.

To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and communications (f) Technical	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile	Necessary for our legitimate interests (to develop our products/services and grow our business)

You can instruct us to stop sending you marketing information and Fact Sheet(s) by contacting us at the above address.

4. DATA SECURITY

We have put in place appropriate security measures to prevent any personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.

We have also put in place procedures to deal with any suspected personal data breach and will notify any data subject and, any applicable regulator, of a breach where we are legally required to do so.

5. DATA RETENTION

We will only retain personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure, the purposes for which we process personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

Some data may be retained for legal (including tax) reasons for a period exceeding that which we require for our business purposes.

6. YOUR LEGAL RIGHTS

Notwithstanding that we will not be processing personal data of those whose investments we manage, nevertheless, if you believe that we are processing personal data about you, you have rights under data protection laws in relation to your personal data.

You have the right to:

- **Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that the data is correct and that we are lawfully processing it.
- **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- **Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

- **Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- **Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- **Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please write to us at the address above.

No Fee Usually Required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

What We May Need From You

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a necessary security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time Limit to Respond

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

7. COOKIE POLICY

Information about Cookies

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site. By continuing to browse the site, you are agreeing to our use of cookies.

A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer if you agree. Cookies contain information that is transferred to your computer's hard drive.

We use the following cookies:

1. **Analytical/performance cookies.** We use Google Analytics®. They allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily. This cookie enables us to:

- Estimate our audience size and usage pattern.
- Store information about your preferences, and so allow us to customise our site and to provide you with offers that are targeted at your individual interests.
- Speed up your searches.
- Recognise you when you return to our site.
- Allow you to use our site in a way that makes your browsing experience more convenient, for example, by allowing you to store items in an electronic shopping basket between visits.

You can find out more information by visiting:

<https://support.google.com/analytics/answer/6004245?hl=en>

2. **Third party cookies.** Our site includes third party video content. This content may itself contain cookies. We have no information on or control over these cookies. These cookies are likely to be analytical/performance cookies or targeting cookies.

You may block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our site.

Except for essential cookies, all cookies will expire after twelve months.