

WEBSITE PRIVACY POLICY

GREATER PACIFIC CAPITAL LLP

INTRODUCTION

Greater Pacific Capital LLP (“GPC”, “we” or “us” “our”) respects your privacy and is committed to protecting your personal data (**Your Data**). This policy will inform you as to how we look after Your Data when you visit our website <http://greaterpacificcapital.com/> (regardless of where you visit it from) and your privacy rights and how the law protects you. Please note that this policy is specific to Your Data sent by you to our website and does not apply more generally to any personal data provided to us by other means.

GPC is made up of different branches which are located in and outside of the European Economic Area (**EEA**), details of which can be found <http://greaterpacificcapital.com/contact-us/> (**Group**). This privacy notice will apply only to how GPC’s offices in the EU are responsible for processing Your Data.

You can download a pdf version of the policy here. Please also use the Glossary to understand the meaning of some of the terms used in this policy.

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1. IMPORTANT INFORMATION ABOUT WHO WE ARE

The purpose of this website privacy policy

This policy aims to give you information on how we collect and process Your Data through your use of this website, including any data you may provide through this website when you submit an enquiry to us.

This website is not intended for children and we do not knowingly collect data relating to children.

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

Controller

The Company is the controller and responsible for this website. We have appointed a privacy officer (**Privacy Officer**) who is responsible for overseeing questions in relation to this policy. If you have any questions about this policy, including any requests to exercise [Please see our current Data Retention Policy](#) below:

During the provision of our services to you we will retain Your Data to perform the contract. We are required by law to retain specific categories of Your Data for certain periods after you cancel your contract with us and comply at all times with anti-money laundering regulations.

Unless expressly agreed otherwise with you, we will keep Your Data whether in original, copy or imaged form for the periods set out in our Data Retention Policy after which time GPC may destroy or delete them and any copies or images of them.

Your Data will be kept for certain periods after your retainer with us has terminated. The periods for which we will retain Your Data are as follows:

- *Where you become our client, we will keep Your Data for the duration of the contract and for a period of 6 years after the contract has ended. Please note that we may keep Your Data for longer than the periods stated above if it is necessary. However, this will be assessed on a case by case basis. If we determine that it is necessary to keep Your Data for longer than the periods stated above, we will confirm this to you in writing at the end of our retainer with you and explain why it is necessary.*
- *Where we collect Your Data for the purposes of recruitment and/or employment, we will keep Your Data for the following periods:*
 - *If you are employed by us, we will keep Your Data for the duration of the employment and for a period of 6 years after your employment has terminated; or*
 - *If your application is unsuccessful, we will keep Your Data for 1 year.*

Where the retention period has expired, we will proceed to destroy Your Data unless you have expressly consented to us retaining Your Data for longer or we must keep Your Data to comply with any legal obligations or we have determined that it is necessary to keep Your Data for longer. If we determine that it is necessary to keep Your Data for longer than the periods stated above, we will confirm this to you in writing at the end of our retainer with you and explain why it is necessary.

- *Where Your Data is collected via the website (where you do not become our client), we will keep Your Data for a period of 14 months.*

Please note that our Data Retention Policy may be amended from time to time.

We will take all reasonable steps to destroy or erase Your Data that we no longer require in accordance with our applicable Data Retention Policy. This includes requiring third parties to delete such data where applicable.

In some circumstances you can ask us to delete your data: see your legal rights below for further information.

In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

Your legal rights, please contact the Privacy Officer using the details set out below:

Full name of legal entity:	Greater Pacific Capital LLP
Name or title of Privacy Officer:	Lesley Whittle
Email address:	privacyofficer@greaterpacificcapital.com
Postal address:	38 Wigmore Street, London, W1U 2RU
Telephone number:	+44 207 535 1690

If you have any queries, concerns or complaints about the use of Your Data by us, please raise them with the Privacy Officer. If this does not resolve the problem to your satisfaction, or, if you prefer to raise the issue with somebody else, then please speak with our client care officer, Gary Varley (Compliance Officer) who will deal with your complaint. 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). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

Changes to the website privacy policy and your duty to inform us of the changes

This version was last updated in June 2018.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if Your Data changes during your relationship with us.

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. When you leave our website, we encourage you to read the privacy policy of every website you visit.

2. THE DATA WE COLLECT ABOUT YOU

Personal data or personal information, means any information about an individual from which that person can be identified which includes not only individuals in their personal or private capacity but also directors and owners of bodies corporate. It does not include data where a person's identity has been removed (anonymous data). We may collect, use, store and transfer different kinds of data about you which we have grouped together as follows:

Identity Data includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.

Recruitment Data: includes data about you in your CV and covering letter.

Contact Data includes billing address, home address, email address and telephone numbers.

Profile Data includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.

Technical Data includes internet protocol (IP) address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website.

Usage Data includes information about how you use our website, products and services.

Marketing and Communications Data includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect and use **Aggregated Data** such as statistical or demographic data for internal purposes. Aggregated Data may be derived from Your Data but is not personal data as it does **not** directly or indirectly reveal your identity. For example, we may aggregate information about how you use our website and services to calculate the percentage of users accessing a specific website feature, but this is anonymised. However, if we combine or connect Aggregated Data with Your Data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this policy.

We do not collect any **Special Categories** of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

3. IF YOU FAIL TO PROVIDE DATA

If you choose not to send Your Data through the website, you will need to contact us by other means as we will not be able to identify who you are through any website interaction.

4. HOW IS YOUR DATA COLLECTED?

We use different methods to collect data from and about you including through:

Direct interactions. You may give us your Identity, Contact and Financial Data by filling in forms, or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:

- make an online enquiry;
- subscribe to our services or publications;
- apply for a job with us;
- request marketing material to be sent to you;
- provide us with feedback.

Automated technologies or interactions. As you interact with our website, we may automatically collect data about your equipment, browsing actions and patterns. Please see our Cookie Policy for further details. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our cookie policy for further details.

Third parties or publicly available sources. We may receive Identity Data and Contact data about you from various third parties and public sources. For example, we may receive Technical Data from analytics providers such as Google based outside the EU.

5. HOW WE USE YOUR DATA

We will only use Your Data when the law allows us to. Most commonly, we will use Your Data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- 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.

See “Purposes for which we will use your data” below to find out more about the types of lawful basis that we will rely on to process your personal data.

Generally, we do not rely on Consent as a legal basis for processing Your Data other than in relation to sending direct marketing communications to you via email or text message. You have the right to withdraw Consent to marketing at any time by using the unsubscribe button in any email communication.

6. PURPOSES FOR WHICH WE WILL USE YOUR DATA

We have set out below, in a table format, a description of all the ways we wish to use Your Data, and 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 Data for more than one lawful ground depending on the specific purpose for which we are using Your Data. Please contact the Privacy Officer at privacyofficer@greaterpacificcapital.com if you need details about the specific legal ground we are relying on to process Your Data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new customer	(a) Identity (b) Contact	Performance of a contract with you
To recruit you and/or employ you	(a) Identity (b) Contact (c) Recruitment	Performance of a contract with you
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a survey	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)
To enable you to partake in a prize draw, competition or complete a survey	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation

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 (f) Marketing and Communications	Necessary for our legitimate interests (to develop our products/services and grow our business)

7. MARKETING

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. We have established the following personal data control mechanisms:

Promotional offers from us

We may use your Identity and Contact Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing). We will only do so with your Consent.

You will receive marketing communications from us if you have given your Consent for us to use Your Data in this way. You have the right of Opting-Out at any time as described below.

Third party marketing

We will get your express opt-in Consent before we share Your Data with any company outside GPC for marketing purposes.

Opting out

You can ask us or third parties to stop sending you marketing messages at any time by emailing privacyofficer@greaterpacificcapital.com or by clicking on an email unsubscribe link.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a service purchase, warranty registration, product/service experience or other transactions.

8. COOKIES

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of our website may become inaccessible or not function properly. For more information about the cookies we use, please see our Cookie Policy.

9. CHANGE OF PURPOSE

We will only use Your Data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please email privacyofficer@greaterpacificcapital.com. Should we need to use Your Data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process Your Data without your knowledge or Consent, in compliance with the above rules, where this is required or permitted by law.

10. DISCLOSURES OF YOUR DATA

We may have to share Your Data with the parties set out below for the purposes set out in the table in “Purposes for which we will use your data” above.

- Information sent using the contact entry forms on the office and contact page are received by staff of GPC.
- External Third Parties as set out in the Glossary.
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. If a change happens to our business, then the new owners may use Your Data in the same way as set out in this policy.

We require all third parties to respect the security of Your Data and to treat it in accordance with the law. We do not allow our third-party service providers to use Your Data for their own purposes and only permit them to process Your Data for specified purposes and in accordance with our instructions.

11. INTERNATIONAL TRANSFERS

In addition to the disclosures set out in “Disclosures of your data” above, some of our offices are based outside the European Economic Area (EEA) so their processing of Your Data will involve a transfer of data outside the EEA.

Whenever we transfer Your Data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer Your Data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission.
- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe.
- Where we use providers based in the US, we may transfer data to them if they are part of the EU-US Privacy Shield Framework which requires them to provide similar protection to personal data shared between the Europe and the US.

Please email privacyofficer@greaterpacificcapital.com if you want further information on the specific mechanism used by us when transferring Your Data out of the EEA.

12. DATA SECURITY

We have put in place appropriate security measures to prevent Your Data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to Your Data to those employees, agents, contractors and other third parties who have a business need to know. They will only process Your Data on our instructions and they are subject to a duty of confidentiality.

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

13. DATA RETENTION

We will only retain Your 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 Your Data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of Your Data, the purposes for which we process Your Data and whether we can achieve those purposes through other means, and the applicable legal requirements.

Please see our current Data Retention Policy below:

During the provision of our services to you we will retain Your Data to perform the contract. We are required by law to retain specific categories of Your Data for certain periods after you cancel your contract with us and comply at all times with anti-money laundering regulations.

Unless expressly agreed otherwise with you, we will keep Your Data whether in original, copy or imaged form for the periods set out in our Data Retention Policy after which time GPC may destroy or delete them and any copies or images of them.

Your Data will be kept for certain periods after your retainer with us has terminated. The periods for which we will retain Your Data are as follows:

- *Where you become our client, we will keep Your Data for the duration of the contract and for a period of 6 years after the contract has ended. Please note that we may keep Your Data for longer than the periods stated above if it is necessary. However, this will be assessed on a case by case basis. If we determine that it is necessary to keep Your Data for longer than the periods stated above, we will confirm this to you in writing at the end of our retainer with you and explain why it is necessary.*
- *Where we collect Your Data for the purposes of recruitment and/or employment, we will keep Your Data for the following periods:*
 - *If you are employed by us, we will keep Your Data for the duration of the employment and for a period of 6 years after your employment has terminated; or*
 - *If your application is unsuccessful, we will keep Your Data for 1 year.*

Where the retention period has expired, we will proceed to destroy Your Data unless you have expressly consented to us retaining Your Data for longer or we must keep Your Data to comply with any legal obligations or we have determined that it is necessary to keep Your Data for longer. If we determine that it is necessary to keep Your Data for longer than the periods stated above, we will confirm this to you in writing at the end of our retainer with you and explain why it is necessary.

- *Where Your Data is collected via the website (where you do not become our client), we will keep Your Data for a period of 14 months.*

Please note that our Data Retention Policy may be amended from time to time.

We will take all reasonable steps to destroy or erase Your Data that we no longer require in accordance with our applicable Data Retention Policy. This includes requiring third parties to delete such data where applicable.

In some circumstances you can ask us to delete your data: see your legal rights below for further information.

In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

Your legal rights

In certain circumstances, you have the following rights under data protection laws in relation to Your Data. You have the right to:

Request access to Your Data (commonly known as a “data subject access request”). This enables you to receive a copy of the Your Data we hold about you and to check 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 Data. This enables you to ask us to delete or remove Your 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 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 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 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 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 Data. This enables you to ask us to suspend the processing of Your Data in the following scenarios:

- if you want us to establish the data's accuracy;
- where our use of the data is unlawful but you do not want us to erase it;
- where you need us to hold the data even if we no longer require it; or
- 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 Data to you or to a third party. We will provide to you, or a third party you have chosen, Your 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 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 email privacyofficer@greaterpacificcapital.com or telephone +44 207 935 6752 and ask to speak to the Privacy Officer.

14. NO FEE USUALLY REQUIRED

You will not have to pay a fee to access Your 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.

15. 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 Data (or to exercise any of your other rights). This is a 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.

16. 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.

17. GLOSSARY

Legitimate Interest: means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process Your Data for our legitimate interests. We do not use Your Data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by emailing privacyofficer@greaterpacificcapital.com.

Performance of Contract: means processing Your Data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Comply with a legal or regulatory obligation: means processing Your Data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

Consent: means processing Your Data where you have given us clear consent to do so for a specific purpose.

External Third Parties: means service providers acting as processors based in the UK who provide IT and system administration services or other services.