Privacy Policy

This privacy policy applies to the use of the Novia Global Wealth Management Service ("The Service") by existing and prospective Investors, Advisers and employees, agents and contractors of Firms, suppliers and other parties with which we have relationships. Novia Global Limited ("Novia", "we", "us" or "our") is committed to protecting and respecting your privacy.

This policy together with our Terms of Use (http://www.novia-global.com/terms-of-use/) (and any other documents referred to in it) sets out the basis on which any personal data we collect from you, or that you or your Adviser provide to us, will be processed by us or shared by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it. By visiting www.novia-global.com (our website) you are accepting the practices described in this policy.

Novia is the data controller and responsible for your personal data covered by this privacy notice.

Our Head of Compliance is responsible for overseeing questions in relation to this privacy policy. Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to:

Head of Compliance
22 St Lawrence St
Southgate
Bath
BA1 1AN
United Kingdom

Telephone: +44 (0) 1225 517517

Email: clientservices@novia-global.com

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.

Information We Collect From You and Why

Personal data means any information about a living individual from which that person can be identified. We may collect, use, store and transfer different kinds of personal 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. – To establish and to identify you.
- Contact Data includes home address, email address and telephone numbers. – To establish and to identify you.
- Financial Status Data includes Information about your financial status (i.e. income and savings) or other financial information about your professional and employment details, trading history and other personal information. - To prevent fraud and determine whether our Services are appropriate for you.
- Financial Data includes IBAN details and other payment processing information. - To facilitate your funding and withdrawal requests.
- Documentary Data includes information about you that is stored in different documents in various forms or copies of them, including things like your passport, identity card, driver license as well as documents for the proof of your address, payslip/tax return as proof of source of funds, corporate documents of your entity, trust deeds, powers of attorney, credit checks. - To verify your identity and perform KYC checks.
- Socio-Demographic Data includes information about your education, profession and/or details about work and nationality. - To verify your identity and perform KYC checks.
- Transaction Data includes details about investments and payments to and from you. – To manage investment records, facilitating transactions, and ensuring compliance with financial regulations.
- Technical Data includes the Internet Protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform. - To help improve our Services to you. (Whenever we process such information, we will always endeavour to use it on an aggregated and anonymised basis).
- Visit Data includes the full Uniform Resource Locators (URL), clickstream to, through and from our website (including date and time), pages you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), methods used to browse away from the page and any phone number used to call our customer service number. - To help improve our Services to you. (Whenever we process such information, we will always

endeavour to use it on an aggregated and anonymised basis).

- Profile Data includes your username and password, feedback and survey responses. - To maintain secure access, support personalized service, and capture client feedback to improve offerings.
- Usage Data includes information about how you use our website and services. – To help optimize the website and service experience, monitor performance, and enhance functionality.
- Sensitive Data comprises information about the health of investors. - To comply with legal requirements and ensure suitability of services for investors' specific needs.
- Marketing and Communications Data includes your preferences in receiving promotion and marketing material from us and our third parties and your communication preferences during the registration. – To enable customization of marketing efforts and allows the company to respect user communication preferences.

We also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal 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 privacy policy.

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

- Information you give us. This is information about you that you give us by applying for an account, filling in forms on our website or by corresponding with us by phone, e-mail or otherwise. It includes information you provide when you register to use our website, and when you report a problem with our website. The information you give us includes your Identity Data, Contact Data and Financial Data. Please keep us informed if your personal data changes during your relationship with us.
- Information we collect about you. With regard to each of your visits to our website we may automatically collect the Technical Data, Visit Data, Profile and Usage data.
- Information we receive from other sources. This is information we receive about you from third parties.

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 website. For detailed information on the cookies we use and the purposes for which we use them see our cookie policy - http://www.novia-global.com/cookie-policy/

Purposes for Which We Will Use Your Personal Data

We will only use your personal data when applicable law allows us to. Most commonly, we will use your personal 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.

We have set out below, in a table format, a description of all the ways we plan to use your personal 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 personal data for more than one basis depending on the specific purpose for which we are using your data. Please contact us should you need details about the lawful basis or legitimate interest we are relying on to process your personal data.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new client	- Identity - Contact	Performance of a contract with you
To provide the Service and administer your account with us including on this website	- Identity - Contact - Financial - Transaction	Performance of a contract with you
To manage our relationship with you that will include: - notifying you about changes to our terms or privacy policy - if we ask you to leave a review or take a survey - providing information on your account as required by regulations	- Identity - Contact - Profile	- Performance of a contract with you - Necessary to comply with a legal obligation - Necessary for our legitimate interests (to keep our records updated and to study how clients use the Service)
To enable us to contact and send information to employees, agents and contractors of suppliers and other parties with whom we have relationships in relation to use of the Service	- Identity - Contact	- Necessary for our legitimate interests (to manage our relationship)
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	- Identity - Contact - Technical - Visit	- 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) - Necessary to comply with a legal obligation
To maintain various reports, registers and information relating to our legal obligations imposed by relevant laws to which we are subject, as well as specific statutory requirements, and to comply with applicable law, court order, other judicial process or the requirement of any applicable regulatory authority	- Identity - Contact - Technical - Visit	- Necessary to comply with a legal obligation - Necessary for our legitimate interests
To investigate or settle enquiries or disputes or respond to complaints	- Identity - Contact - Technical - Visit	Necessary for our legitimate interests (to ensure that disputes, complaints or enquiries are investigated and resolved quickly and in an efficient manner)
To deliver relevant website content to you	- Identity - Contact - Profile - Usage - Technical - Visit	Performance of a contract with you
To use data analytics to improve our website, the Service, customer relationships and user experience	- Technical - Visit - Usage	Necessary for our legitimate interests (to define types of clients for the Service, to keep our website updated and relevant, to develop our business)
To provide training on the Service to you, employees, agents and contractors of Novia	- Identity - Contact - Profile	Necessary for our legitimate interests (to ensure that users understand the Service and use its features effectively)
To enable us to contact and send information to you, employees, agents and contractors of Novia in relation to use of the Service and the products available through the Service	- Identity - Contact - Profile	Necessary for our legitimate interests (to ensure that users understand the Service and use its features effectively)

We will combine information you give to us and information we otherwise collect about you. We will use the different information we collect for the purposes set out above (depending on the types of information we receive).

We will not use your personal data to make any decisions about you on an automated basis.

Where our use of your personal information does not fall under the abovementioned lawful bases we will require your consent. Such consent shall be freely given by you and you have the right to withdraw your consent at any time by contacting us using the contact details set out in this privacy policy.

How We Share Your Information

We will only share your personal data with third parties as described in this privacy notice or where we are required to do so by law or regulation. For example, we may be required to disclose personal data to reduce, prevent and detect fraud or to comply with a court order.

Organisations we may be required to provide your personal data to include:

- The Financial Conduct Authority
- The Financial Ombudsman Service
- HM Revenue & Customs
- Crime Prevention agencies

We will disclose your personal information to members of our group and to various suppliers and sub-contractors who assist us with the provision of the Service:

- Your Adviser
- fund managers of investments in your Account
- our printing and mailing supplier
- the disposer of our confidential waste
- our auditors, lawyers, bankers, and insurers who provide accounting consultancy, banking, legal and insurance services, government departments.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions. We may choose to sell, transfer, or merge parts of our business or assets with a third party, in which case we will disclose your personal data to the prospective seller or buyer of such business or assets but only as part of a confidential due diligence process.

Where We Store Your Personal Data

Information you provide to us is stored on secure servers located in the UK which are provided and managed by external suppliers appointed by us. The server suppliers are subject to strict contractual requirements on data security. We also have internal policies and controls in place to minimise the risk of your data being lost, misused, accidentally destroyed or disclosed.

Some of your personal data we collect may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring one of the following safeguards is implemented:

We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission. For further details, see European Commission: Adequacy of the protection of personal data in non-EU countries.

Where we use certain service providers, we will use specific contract terms approved by the European Commission which give personal data the same protection it has in the EEA. For further details, see European Commission: Model contracts for the transfer of personal data to third countries.

Where we have given you (or where you have chosen) a password which enables you to access certain parts of our website, you are responsible for keeping this password confidential. We ask you not to share a password with anyone. We use strict procedures and security features to guard against unauthorised access of all personal data we hold.

Period for Retaining Personal Data

In general, we will keep personal data for at least five years longer than the period you hold your account with us, but there are some exceptions. For example, we will retain records for a longer period for legal, regulatory or technical reasons we cannot delete it.

In some circumstances we may 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 Rights

You have the following rights in relation to your personal data:

Request access to your personal data: You can ask for a copy of the personal data we hold about you free of charge. However, we may charge a reasonable fee if your request is repetitive or excessive or we may refuse to comply with your request.

We may need to request specific information from you to help us confirm your identity to ensure that personal data is not disclosed to any person not entitled to receive it. We may also contact you to ask you for further information to speed up our response.

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

Request correction of your personal data: You have the right ask for any incomplete or inaccurate data we hold about you to be corrected, though we may need to verify the accuracy of the new data provided to us.

Request the deletion of your personal data: you may ask us to delete or remove personal data where there is no good reason for us continuing to process it. Please note, however, we may not always be able to comply with your request (for example where data is retained to fulfil our regulatory obligations).

Object to processing of your personal data: where we are relying on a legitimate interest and you want to object to processing on this ground as you feel it impacts on your rights and freedoms you may object to our processing of data. 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: you may ask us to restrict 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 transfer of your personal data: where information has been provided to us either so that we can perform a contract with you or by your consent you can 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 personal data in a commonly used format.

Withdraw consent: You can 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 services to you. We will advise you if this is the case at the time you request to withdraw your consent.

Complaint: You are entitled to lodge a complaint with the Office of the Commissioner for the Protection of Personal Data in case you are not satisfied with the manner with process your personal data.

If you wish to exercise any of the rights set out above, please contact our Head of Compliance.

Our website contains links to and from other websites. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

Personal Data Breaches

The GDPR introduces a duty on all organisations to report certain types of personal data breach to the relevant supervisory authority. The Company is obliged to do this within 72 hours of becoming aware of the breach, where feasible following its framework for reporting and managing data security breaches affecting personal or sensitive data held by the Company.

If the breach is likely to result in a high risk of adversely affecting individuals' rights and freedoms, the Company is required to also inform those individuals/data subjects without undue delay.

The below procedures are there to provide a framework for reporting and managing data security breaches affecting personal or sensitive data held by the Company.

A personal data breach is defined as having the potential to affect the confidentiality, integrity or availability of personal data held by the Company in any format. Such breaches may happen for any number of reasons, including:

a) The disclosure of confidential data to unauthorised persons;

b) Loss or theft of data and/or equipment on which data is stored;

c) Inappropriate controls allowing for unauthorised use of information;

d) Breaches in the Company's IT systems and security;

e) Unauthorised access to computer systems, e.g. hacking;

f) Viruses or other security attacks;

g) Breaches of physical security where data is kept;

h) Leaving IT equipment unattended, allowing unauthorised access;

i) Emails containing personal data sent in error to the wrong recipient.

Legal Disclaimer

The Company may disclose your personally identifiable information as required by rules and regulations, and when the Company believes that disclosure is necessary to protect our rights and/or to comply with any proceedings, court order, legal process served or pursuant to governmental, intergovernmental or other regulatory bodies.

The Company shall not be liable for misuse or loss of personal information or otherwise on the Company's website(s) that the Company does not have access to or control over. The Company will not be liable for unlawful or unauthorised use of your personal information due to misuse or misplacement of your passwords, negligent or malicious intervention and/or otherwise by you or due to your acts or omissions or a person authorized by you (whether that authorization is permitted by the terms of our legal relationship with you or not).

Changes to Our Privacy Policy

This privacy policy may, at our discretion, be updated from time to time.

Any changes we make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail or post. Please check back frequently to see any updates or changes to our privacy policy.