



New Street Research LLP is authorized and regulated by the Financial Conduct Authority.

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NEW STREET RESEARCH LLP PRIVACY POLICY

How we use your information

This privacy notice tells you what to expect when New Street Research LLP collects personal information. We may collect and process the following data about you;

- Information that you provide by filing in forms on our site newstreetresearch.com
- Information that you provide to us by telephone, e-mail or face to face
- If you contact us, we may keep a copy of that correspondence.

Visitors to our website

When someone visits New Street Research LLP we use a third-party service, Google Analytics, to collect standard internet log information and details of visitor behaviour patterns. We do this to find out things such as the number of visitors to the various parts of the site. This information is only processed in a way which does not identify anyone. We do not make, and do not allow Google to make, any attempt to find out the identities of those visiting our website. If we do want to collect personally identifiable information through our website, we will be up front about this. We will make it clear when we collect personal information and will explain what we intend to do with it.

Use of cookies by New Street Research LLP

Cookies are small text files that are placed on your computer by websites that you visit. They are widely used to make websites work, or work more efficiently, as well as to provide information to the owners of the site. These cookies are used to collect information about how visitors use our website. We use the information to compile reports and to help us improve the website. The cookies collect information in an anonymous form, including the number of visitors to the website and blog, where visitors have come to the website from and the pages they visited.

Security and performance

New Street Research LLP uses a third-party service to help maintain the security and performance of the ICO website. To deliver this service it processes the IP addresses of visitors to our website(s).

People who email us

Any email sent to us, including any attachments, may be monitored and used by us for reasons of security and for monitoring compliance with office policy. Email monitoring or blocking software may also be used. Please be aware that you have a responsibility to ensure that any email you send to us is within the bounds of the law.

People who make a complaint to us

If we receive a complaint from a person we make up a file containing the details of the complaint. This normally contains the identity of the complainant and any other individuals involved in the complaint. We will only use the personal information we collect to process the complaint and to check on the level of service we provide. We usually must disclose the complainant's identity to whoever the complaint is about. This is inevitable where, for example, the accuracy of a person's record is in dispute.

We usually must disclose details of the complaint to our professional Indemnity Insurance Broker and Insurer.

We may be required to provide a copy of our file to the Financial Ombudsman Service should an adjudicator be required to consider the complaint case.

We are required to disclose to The Financial Conduct Authority (FCA) high level analytics concerning the number and nature of complaints received. This data does not include names or details that identify the specific data subject.

We will keep personal information contained in complaint files in line with our retention policy. This means that information relating to a complaint will be retained for 5 years from closure. It will be retained in a secure environment and access to it will be restricted according to the 'need to know' principle.

People who use our services

New Street Research LLP provide a range of Financial Services to Data Subjects. We process data provided by the data subject and other sources to deliver the appropriate products and services to Data Subjects.

We must hold the details of the people who have requested the service to provide it. However, we only use these details to provide the service the person has requested and for other closely related purposes.

Use of data processors

Data processors are third parties who provide elements of our service for us. We have contracts in place with our data processors. This means that they cannot do anything with your personal information unless we have instructed them to do it. They will not share your personal information with any organisation apart from us. They will hold it securely and retain it for the period we instruct.

Our Data processors / Third parties that we use include:

- Banking arrangements: Coutts & Co, 440 Strand, London WC2R 0QS
- Legal opinion where required: Birketts LLP, 24-26 Museum Street, Ipswich, IP1 1HZ
- Regulatory and Compliance opinion where required: Nigel Drury, Cordium Consulting, DJK Capital Ltd
- Sanctions and PEPs checking (Anti Money laundering): Nigel Drury, Cordium Consulting, DJK Capital Ltd
- Client Money and Audit requirements: New Street does not hold client money, Audit exempt. Greenback Alan LLP are the accountants'
- Third Party Servers: Microsoft Corporation, One Microsoft Way Redmond, WA 98052, USA and Salesfusion, 3565 Piedmont Road NE, Bldg2, Atlanta, GA 30305, USA

Your rights

Under the Data Protection Act 1998, you have rights as an individual which you can exercise in relation to the information we hold about you. From 25 May 2018 the General Data Protection Regulations (GDPR) come into force.

Access to personal information (Portability)

Data Subjects may submit a Subject Access Request - to obtain a copy of the personal data that we hold about them in a structured and portable manner. All SAR requests should be sent to: infor@newstreetresearch.com

Confirmation of whether, and where, the controller is processing their personal data

New Street Research LLP is the Data Controller and a Processor. New Street Research LLP undertakes data processing within the EEA.

Right of Data subjects to erasure (Right to be forgotten)

Data Subjects may notify the Firm if they wish to exercise their right to erasure. Such a withdrawal of Consent does not affect the lawfulness of processing based on consent prior to the withdrawal. Data Subjects that exercise this right will be removed from any marketing or future contact. New Street Research LLP may retain a copy of any personal data may be retained by the Controller if the processing is necessary for the establishment, exercise or defence of legal claims.

Right of rectification New Street Research LLP will seek to ensure that inaccurate or incomplete data will be rectified. Data Subjects have the right of rectification

Right to object to processing for the purposes of Direct Marketing

Data Subjects may notify the Firm if they wish to exercise their right to be removed from any Direct Marketing activities. New Street Research LLP may still contact the Data Subject to fulfil any contractual obligations concerning the policies and services provided.

Disclosure of personal information

In many circumstances we will not disclose personal data without consent. However, when we investigate a complaint, for example, we will need to share personal information with the organisation concerned and with other relevant bodies. Further information is available in our Information Charter about the factors we shall consider when deciding whether information should be disclosed.

Sharing Information with Third Parties

We may share your information with third party services providers such as insurance providers, compliance, and other agents relevant to the business activity.

Changes to this privacy notice

We keep our privacy notice under regular review. This privacy notice was last updated on **24 May 2018**

How to contact us

If you want to request information about our Privacy Policy, you can email us or write to:

Maria Van Tonder
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London EC2N 2HG