

Marylebone Partners LLP

Privacy Notice

October 2022

Introduction

Marylebone Partners LLP (“Marylebone”) is a limited liability partnership registered in England & Wales under number OC381480 and is authorised and regulated by the Financial Conduct Authority (“FCA”) with Firm Reference Number 596118. The registered address is 65 Compton Street, London, EC1V 0BN.

Marylebone recognises the importance of and is committed to protecting your information. Marylebone seeks to comply with its obligations under the General Data Protection Regulation (‘GDPR’), which regulates the processing of data, and ensures that your data is processed fairly and lawfully, is kept secure and only that data necessary for any processing is retained.

This Privacy Notice summarises the personal data we may collect, how we may use that data, how we ensure the information we have is kept accurate and how you can request access, deletion, rectification, restriction, transfer and withdraw consent (where applicable) and make a complaint. We primarily collect data to provide you with services you have requested. We may update this Privacy Notice from time to time and will keep the current version on our website.

For the purposes of the GDPR, Marylebone will be the ‘controller’ of the personal data you provide. Please read the following information carefully in order to understand Marylebone’s practices in relation to the treatment of your personal data.

What data privacy principles does Marylebone adhere to?

- Marylebone will process all personal data in a lawfully, fair and transparent manner;
- Marylebone will only collect personal data where it is necessary;
 - For Marylebone to provide a service to you;
 - For you to provide a service to Marylebone;
 - For Marylebone to keep you informed of its products and services; or
 - For Marylebone to comply with its legal and regulatory obligations.
- The personal data collected by Marylebone will be adequate, relevant and limited to what is necessary in relation to the specific purpose for which your data will be processed;
- Marylebone will take all reasonable steps to ensure that personal data is accurate and, where necessary, kept up-to-date;
- Marylebone will maintain personal data in a form that permits identification no longer than is necessary for the purposes for which the personal data has been collected for processing, in accordance with Marylebone’s record retention requirements as mandated by the FCA;

- Marylebone will hold and process person data in a manner that ensures appropriate security;
- Marylebone will only share personal data where it is necessary to provide the agreed service or where it is necessary for Marylebone to comply with its legal and regulatory requirements.
- Marylebone will only utilise a service provider based outside of the UK for the processing of personal data where this is strictly necessary to facilitate our services to you. In all cases, we will ensure service providers are fully compliant with the GDPR, or deemed equivalent, ahead of transferring any personal data.

What personal data does Marylebone collect and why?

In the course of providing products/services to you, Marylebone may collect information that is considered personal information (e.g. name, contact details, address, passport number, driving licence).

As a client or contact of Marylebone, we will require some personal information in order to verify your identity and have the applicable relationship with you. Some of this information may be required to satisfy legal obligations (e.g. to comply with obligations arising under the money laundering regulations whereas other information may be required in connection with the provision of services to you). The information collected will vary depending on the service Marylebone provides to you or you provide to Marylebone, but typically includes:

- Personal information (e.g. your name, date of birth, passport number or national insurance number);
- Contact information: which may include your address, telephone number and email address.

Where does Marylebone store my personal data?

Marylebone has put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. We also have procedures to deal with any suspected data security breach.

How long does Marylebone retain personal data?

As a regulated entity, Marylebone is required to maintain its books and records for five years from either ceasing a business relationship, or, in the case of non-clients, from the making of a record – or alternatively, for seven years, where specifically requested to do so by the FCA. As such, information that falls in scope of either of these requirements is retained in line with the FCA's rules.

Any information that is outside the scope of this requirement will be retained whilst relevant and useful, and destroyed where this ceases to be the case or where the data subject specifically requests this.

How have I been categorised in accordance with the GDPR?

The GDPR requires Marylebone to inform you of the legal basis on which we maintain your personal data. As a general rule the following is applicable:

- Clients – Information is maintained on the basis of contractual obligation and/or legitimate interests (where relevant);
- Service providers – Information is maintained on the basis of contractual obligation; and

- Database/marketing contacts – Information is maintained on the basis of legitimate interest.

What are my rights?

Once you have provided your details to Marylebone, you have certain rights which apply, depending on your relationship with Marylebone, the information you have shared with us and Marylebone's legal and regulatory obligations.

- You have the right to request a copy of the information that we hold about you. If you would like a copy of some, or all, of your personal information, please email Marylebone at info@marylebonepartners.com. Marylebone will provide this information to you within one month (with the ability to extend this by an additional two months where necessary), free of charge.
- You have the right to request that the information Marylebone holds about you is erased under certain circumstances including where there is no additional legal and/or regulatory requirement for Marylebone to retain this information.
- As a client, you have the right to request that any information Marylebone holds about you is provided to another company in a commonly used and machine-readable format.
- You have the right to ensure that your personal information is accurate and up to date, or where necessary rectified. Where you feel that your personal data is incorrect or inaccurate and should therefore be updated, please contact info@marylebonepartners.com.
- You have the right to object to your information being processed e.g. for direct marketing purposes.
- You have the right to restrict the processing of your information e.g. limiting the material that you receive or where your information is transferred.
- You have the right to object to any decisions based on the automated processing of your personal data, including profiling.
- You have the right to lodge a complaint with the Information Commissioner's Office (<https://ico.org.uk/concerns/> telephone: +44 (0)30 3123 1113) if you are not happy with the way that we manage or process personal data.

Will I be notified of changes to this notice?

Marylebone may, from time to time, review and update this notice. Marylebone will maintain the latest version of this notice on its website, and where the changes are deemed material, it will make you are aware of these.

Who should I direct questions to?

If you have any questions, concerns or complaints about the practices contained within this document or how Marylebone has handled your data, please email: info@marylebonepartners.com. Alternatively, you may write to:

Marylebone Partners LLP
Second Floor
35 Portman Square
LONDON
W1H 6LR

Cookies

We use cookies to monitor web usage. Cookies are written to the hard drive of a web user, they contain no personal information about the website user and only keep a record of the sites visited and actions on the web site. Some cookies expire after the browser is closed whilst others stay on the hard drive. They are used across many websites.

Most browsers offer you ways to control or block cookies should you wish to. These browser controls will usually be found in the “options” or “preferences” menu in your toolbar. The “help” portion of the toolbar on most browsers will tell you how to stop or manage cookies. For further information on cookies visit the Information Commissioner’s webpage on <https://ico.org.uk/your-data-matters/online/cookies/>