



## Privacy Policy

Lincoln Private Investment Office ("LPIO/we/us/our") is committed to protecting and respecting your privacy. We are a limited liability partnership incorporated in England (company number OC389623) with our registered office at 32 Grosvenor Gardens, London SW1W 0DH. This privacy policy provides information about the personal data that LPIO collects, the basis LPIO collects your personal data, and the ways in which LPIO uses and processes that personal data in relation to:

- providing our Investment and Family Office Services (Services); and
- use of our website at [www.lpio.co.uk](http://www.lpio.co.uk) for the use of the Services (Site).

Please read the following carefully to understand LPIO's views and practices regarding your personal data and how LPIO will treat it.

For the purpose of the Data Protection Act 1998 or as that legislation maybe amended or replaced (Act), we are the data controller.

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### Personal data collection

LPIO may collect and use the following kinds of personal data:

- **Identity Information** – Information that you provide by filling in forms in order to enquire or register to use our Services. This information may include, but is not limited to, your name, postal address, mobile phone number and email address.
- **Communication Information** – If you contact LPIO or vice versa, LPIO may keep a record of that contact. LPIO may also ask you for information when you report a problem with the Services.
- **Technical Information** – Information LPIO collects automatically when you use our Site including, but not limited to, the IP address used to connect your computer to the internet, your browser type and version, and your browser plug-in types and versions.
- **Usage Information** – Information about your use of the Site which LPIO collects automatically including, but not limited to, metadata and other communication data.
- **Registration Information** – This is information you give LPIO about you when you register to use the Services, or by corresponding with us. LPIO requests personal data, family details, employment details, passport information, tax residency status, national insurance number, and financial information, including source of wealth.
- **Transaction Information** – This is the information about transactions carried out by you or us in using our Services (including the date, amount, currency and the name and type of transaction).
- **Financial Information** – This includes information regarding your bank accounts, investment portfolio and objectives, sources of wealth and financial information, attitude to risk and other financial information required to provide our Services to you.
- **Account Information** – This is the information on your account we provide to you for, and you may otherwise generate during, your use of the Services, including information on how you use the Services.

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### Cookies

The Site's website may use certain cookies from time to time. A cookie is a small file of letters and numbers that LPIO stores on your browser. This allows LPIO to remember your user preferences for future visits to LPIO's Site. This helps LPIO to provide you with the best experience when you browse and also allows LPIO to improve the Site. You can change your website browser settings to reject cookies at any time.

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### Using personal data

LPIO may use:

1. Identity and Communication Information to provide you with information you request from LPIO;
2. Identity, Communication, Registration, Transaction and Financial Information to provide you with the Services and any relevant support for your use of the Services;
3. Registration Information in relation to setting up your account to enable LPIO to provide the Services;
4. Identity, Communication, Registration, Transaction and Financial Information in relation to providing the Services;
5. Technical, Usage, Transaction, Financial and Account Information to provide and to help maintain, protect and improve the Site and Services, and to notify you about changes to them;
6. Registration, Technical, Usage, Transaction, Financial and Account Information ensure content produced by the Services, and content on our Site, is presented in the most effective manner for you and for your computer;
7. Identity and Registration Information for the purposes of security, and prevention and detection of fraud, including verifying your identity for money laundering purposes and complying with financial regulations;
8. Technical and Usage Information to administer our Site and for internal operations, including troubleshooting and testing;
9. Account and Transaction Information for the purposes of statistical analysis of the use of the Services, including the creation of anonymised data which LPIO may use at its discretion; and
10. Limited Registration Information (name, email and telephone numbers) for undertaking direct marketing activities.

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### Basis for using personal data

LPIO is entitled to use your data as described in paragraph 1 above as LPIO is responding to your request and therefore has your consent to this processing.

LPIO is entitled to use your data as described in paragraphs 2, 3, 4 and 5 as LPIO is required to do this as part of our agreement with you to provide the Services.

LPIO is entitled to use your data as described in paragraphs 6, 7, 8, 9 and 10 above as the purposes stated are within LPIO's legitimate interests, including the creation and use of anonymised data to be used by LPIO to improve the Services, detection of any illegal activity, debt collection and direct marketing activities.



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## Disclosure of your information

LPIO may disclose your personal data to third parties:

1. In order for LPIO to register you to, deliver to you and allow you to use the Services (including, but not limited to, providing such information to your accountants, self-invested personal pension schemes, offshore bond providers, counterparties to transactions entered into on your behalf, public companies in which you directly or indirectly hold shares, joint account holder (where applicable), reporting companies and Multrees Investor Services Limited as custodian or another custodian appointed by us).
2. If LPIO is under a duty to disclose or share your personal data in order to comply with any legal obligation.
3. In the event that LPIO sells or buys any business or assets, in which case LPIO may disclose your personal data to the prospective seller or buyer of such business or assets to the extent this cannot reasonably be redacted.
4. If LPIO or substantially all of LPIO's assets are acquired by a third party, in which case personal data held by it about its clients will be one of the transferred assets to the extent this cannot reasonably be redacted.
5. In order to enforce or apply terms of use and other agreements; or to protect the rights, property, or safety of LPIO, its clients, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection, debt collection and credit risk reduction.

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## Basis for disclosure

LPIO is entitled to disclose your data as described in paragraph 1 above as LPIO is required to do this as part of our agreement with you to provide the Services.

LPIO is entitled to disclose your data as described in paragraph 2 on the basis that LPIO is legally required to do so.

LPIO is entitled to disclose your data as described in paragraphs 3, 4 and 5 above as the purposes stated are all within LPIO's legitimate interests.

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## Securing your data

All information you provide to LPIO is stored on secure servers and LPIO will use strict procedures and security features to try to prevent unauthorised access, loss, misuse or alteration of your personal data. LPIO will store all the personal data you provide on its secure servers based in the EU. Information relating to electronic transactions entered into via the Site will be protected by encryption technology. Unfortunately, the transmission of information via the internet is not completely secure. Although LPIO will do its best to protect your personal data, LPIO cannot guarantee the security of your data transmitted to LPIO's Site and any transmission is at your own risk.

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## How long we will store your personal data

We will retain the records relevant to your use of the Services for a minimum period of five years following you discontinuing your use of the Services. This period may be extended by force of law, regulatory requirement or by mutual consent between you and us.

LPIO otherwise only stores your information for as long as is necessary for the purpose it was obtained or for any additional purpose LPIO has explained to you.

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## International transfers

Some of our external third party providers (including, but not limited to, our offshore bond providers) are based outside the European Economic Area (EEA), and so their processing of your personal data will involve a transfer of your data outside the EEA.

Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring that we 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, please see the European Commission: Adequacy of the protection of personal data in non-EU countries.

[https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/adequacy-protection-personal-data-non-eu-countries\\_en](https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/adequacy-protection-personal-data-non-eu-countries_en)

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## Your rights

Under data protection legislation you may have a number of rights in respect of information held about you. These rights are as follows, and can be exercised in accordance with the applicable legislation:

- **Access to information:** You have the right to request a copy of the information LPIO holds about you. If you would like a copy of some or all of your personal data, please email us at [info@lpio.co.uk](mailto:info@lpio.co.uk).
- **Ensuring accuracy of information:** LPIO wants to make sure that your personal data is accurate and up-to-date. You may ask LPIO to correct or complete information that is inaccurate or incomplete.
- **Right to erasure:** You may have a right to erasure, which is more commonly known as the 'right to be forgotten'. This means that in certain circumstances you can require LPIO to delete personal data held about you.
- **Ability to restrict processing:** You may also have the right to require LPIO to restrict LPIO's use of your personal data in certain circumstances. This may apply, for example, where you have notified LPIO that the information LPIO holds about you is incorrect and you would like LPIO to stop using such information until LPIO has verified that it is accurate.
- **Right to data portability:** You may have the right to receive personal data LPIO holds about you in a format that enables you to transfer such information to another data controller (e.g. such as another service provider).



- **Review by an independent authority:** You will always have the right to lodge a complaint with a supervisory body. The relevant authority in the UK is the Information Commissioner's Office.
- **Preventing direct marketing:** LPIO does not sell your data. From time to time, LPIO may send emails containing information about new features and other news about us. This is considered direct marketing. LPIO will always inform you if LPIO intends to use your personal data or if LPIO intends to disclose your information to any third party for such purposes. You can also exercise the right at any time by contacting us at [info@lpio.co.uk](mailto:info@lpio.co.uk).
- **Objecting to other uses of your information:** You may also have the right to object to LPIO's use of your information in other circumstances. In particular, where you have consented to LPIO's use of your personal data, you have the right to withdraw such consent at any time. You may do this by contacting us at [info@lpio.co.uk](mailto:info@lpio.co.uk).

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#### Updating this policy

LPIO may update this privacy policy by posting a new version on the Site or otherwise emailing a new version to you.

We will notify you of any changes in this privacy policy and how they may affect our use and disclosure of your personal data, and any rights you may have in regard to your personal data.

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#### Other parties

LPIO is not responsible for the privacy policies or practices of any third party, including our custodians. A copy of our custodian's privacy policy shall be provided separately.

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#### Contact LPIO

If you have any questions about this privacy policy or LPIO's treatment of your personal data, please write by email to [info@lpio.co.uk](mailto:info@lpio.co.uk).

**Registered Office:**  
Lincoln Private  
Investment Office LLP  
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London SW1W 0DH

[www.lpio.co.uk](http://www.lpio.co.uk)

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Lincoln Private Investment Office LLP is authorised and regulated by the Financial Conduct Authority.