



Britannic Investment Management Limited

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Data Protection Policy

1. Introduction

Britannic Investment Management Limited is committed to protecting the privacy and security of personal data processed as part of our investment management activities. This policy sets out our approach to data protection, in compliance with the General Data Protection Regulation (GDPR) and other relevant legislation.

2. Scope

This policy applies to all personal data processed by Britannic Investment Management Limited, including data relating to clients, employees, associates, and other individuals who interact with our business.

3. Principles

Britannic Investment Management Limited is committed to processing personal data in accordance with the following principles:

Lawfulness, fairness, and transparency: We will process personal data lawfully, fairly, and in a transparent manner.

Purpose limitation: We will only process personal data for specified, explicit, and legitimate purposes.

Data minimization: We will only process personal data that is necessary for the purposes for which it is being processed.

Accuracy: We will ensure that personal data is accurate and up-to-date.

Storage limitation: We will not retain personal data for longer than is necessary for the purposes for which it is being processed.

Integrity and confidentiality: We will process personal data in a manner that ensures appropriate security and confidentiality.

4. Responsibilities

Britannic Investment Management Limited is responsible for ensuring that personal data is processed in accordance with this policy. All employees and associates are responsible for complying with this policy, and for reporting any concerns or incidents relating to data protection to the Data Protection Officer of Britannic Investment Management Limited.

5. Data Protection Officer

Britannic Investment Management Limited has appointed a Data Protection Officer to oversee the implementation of this policy, as well as to monitor compliance with GDPR and other relevant legislation and regulations.

6. Personal Data

Britannic Investment Management Limited will only process personal data for the following purposes:

- To provide investment management services to our clients;
- To manage our relationship with our clients, employees, and associates;
- To comply with legal and regulatory obligations; and
- To pursue legitimate business interests.

7. Data Subject Rights

Britannic Investment Management Limited recognizes the rights of data subjects under GDPR, including the right to access, rectify, erase, and restrict the processing of their personal data. We will respond to all requests from data subjects in a timely manner, and will ensure that appropriate measures are in place to protect the rights of data subjects.

8. Data Breach Response

Britannic Investment Management Limited has implemented procedures to detect, report, and investigate data breaches, as well as to notify data subjects and regulatory authorities where necessary. We will also take appropriate steps to mitigate the impact of any data breaches.

9. Transfer of Personal Data

Britannic Investment Management Limited will only transfer personal data to third parties where necessary for the purposes for which it is being processed, and where appropriate safeguards are in place to protect the privacy and security of personal data.

10. Conclusion

Britannic Investment Management Limited is committed to protecting the privacy and security of personal data processed as part of our investment management activities.

We have implemented policies and procedures to ensure that we comply with GDPR and other relevant legislation and regulations, and we regularly monitor and review our processes to ensure that they remain effective and up-to-date.