

## INVESTMENT PROFESSIONALS DATA PROTECTION PRIVACY NOTICE

We, Church House, are authorised and regulated by the Financial Conduct Authority (“FCA”) to provide investment management services. We are also an Investment Manager to a range of retail investment funds.

### **What data is captured and why?**

As an investment professional, such as a financial adviser or discretionary fund manager, you may recommend Church House funds and/or portfolios or use such funds as part within your own investment strategies.

We capture basic personal contact data, such as name, business telephone and business email addresses together with limited business information. The basis for processing this information is that it is in your legitimate interests as a representative of an existing or prospective fund supporter firm.

It allows us to provide you with an appropriate level of information, to monitor fund performance and stay up to date with investment insight and news from the Church House team. This in turn will assist you in making suitable recommendations to your clients or making informed decisions on the inclusion of the aforementioned funds in your investment strategies.

### **How is data stored and processed?**

All personal data is securely stored electronically and, where necessary, in hard copy paper format. Any paper copies are filed in lockable cabinets, which are only accessible by relevant employees.

Data systems on which personal data is recorded are password protected. Only those employees who need to see the data have access. The data will only be used for the purposes of general contact management and keeping you informed with an appropriate level of information. All formal communications will include the option to unsubscribe.

### **Is data shared with third parties?**

Your data is not shared with any third parties but as mentioned above, it may be held electronically in systems including a customer management database and email marketing platform.

We do not share personal data with any third party for the purpose of marketing.

### **Your rights of access to personal data**

You are entitled to request details from Church House of the personal data we hold about you on our records:

- If your personal details are correct, you need take no action
- If your personal details are incorrect, you can request Church House to correct them and confirm the updated records with you accordingly
- You can request to have your details deleted (“right to be forgotten”)

Your right to be forgotten is only available to those who are not clients of, or are no longer clients of, Church House, subject to our FCA record-keeping obligations (*see below*).

Any enquiries about your personal data should be sent to the Data Protection Officer at Church House, who can be contacted via [dpo@church-house.co.uk](mailto:dpo@church-house.co.uk) or in writing at York House, 6 Coldharbour, Sherborne DT9 4JW.

## For how long is the data stored?

We will retain records of personal data whilst we have active or prospective engagement with you as the data subject. We will review records periodically in order to ensure any unnecessary records are removed. You can request that we delete your records at any time.

## Privacy Notice for clients of Church House

A copy of the Data Protection Privacy Notice pertaining to clients of Church House Investment Management is available on our website at [www.ch-investments.co.uk](http://www.ch-investments.co.uk).

## About Church House

Church House Investment Management is the trading name of Church House Investments Limited, authorised and regulated by the Financial Conduct Authority (190548).

The registered office is York House, 6 Coldharbour, Sherborne, Dorset DT9 4JW. Registered in England, number 3475556.

| Version | Date       | Revisions                               |
|---------|------------|-----------------------------------------|
| 1.1     | April 2018 | Approval of policy                      |
| 1.2     | Dec 2025   | Update to DPPN regarding communications |
|         |            |                                         |