



# AFRICAN PRIVATE OFFICE

*Impartial, objective advice*

## **Privacy Policy**

Protecting your personal details.

Last updated: 1 September 2014

African Private Office LLP (Registered number OC376830), whose registered office is at 5 Empingham Road, Stamford, PE9 2RH, knows that you care how information about you is used and shared and we appreciate your trust in us to do that carefully and sensibly. This notice describes our Privacy Policy and should be read in conjunction with our website usage terms and conditions ('Website Terms').

**By accepting our Website Terms or by visiting [www.africanprivateoffice.com](http://www.africanprivateoffice.com) ('the Website') you are accepting and consenting to the practices described in this Privacy Policy.**

The Website is brought to you by African Private Office LLP. African Private Office LLP believes it is important to protect your Personal Data (as defined in the Data Protection Act 1998) and we are committed to giving you a personalised service that meets your needs in a way that also protects your privacy. This Policy explains how we may collect Personal Data about you. It also explains some of the security measures we take to protect your Personal Data, and tells you certain things we will do and not do. You should read this Policy in conjunction with the Website Terms.

Some of the Personal Data we hold about you may be 'sensitive personal data' within the meaning of the Data Protection Act 1998, for example, information about your health or ethnic origin.

### 1. Collecting Information

We may collect Personal Data about you from a number of sources, including the following:

- 1.1. From you when you agree to take a service from us, in which case this may include your contact details, date of birth, how you will pay for the service and your bank details.
- 1.2. From you when you contact us with an enquiry or in response to a communication from us, in which case, this may tell us something about how you use our services.
- 1.3. From documents that are available to the public, such as the electoral register.

### 2. Using Your Personal Information

- 2.1. Personal Data about our customers is an important part of our business and we shall only use your Personal Data for the following purposes and shall not keep such Personal Data longer than is necessary to fulfil these purposes:
  - 2.1.1. To help us to identify you when you contact us.
  - 2.1.2. To help us to identify services which you could have from us from time to time.
  - 2.1.3. To assist you in the preparation and maintenance of a KYC Profile
  - 2.1.4. To assist you in the opening and maintenance of banking and other financial services relationships with third party institutions
  - 2.1.5. To help us to administer and to contact you about improved administration of any services we have provided before, do provide now or will or may provide in the future.
  - 2.1.6. To allow us to carry out marketing analysis and customer profiling (including with transactional information), conduct research, including creating statistical and testing information.

- 2.1.7. To help to prevent and detect fraud or loss.
- 2.1.8. To allow us to contact you in any way (including mail, email, telephone, visit, text or multimedia messages) about services offered by us unless you have previously asked us not to do so.
- 2.1.9. We may monitor and record communications with you (including phone conversations and emails) for quality assurance and compliance.
- 2.1.10. We may check your details with fraud prevention agencies. If you provide false or inaccurate information and we suspect fraud, we will record this.
- 2.2. We will not disclose your Personal Data to any third party except in accordance with this Privacy Policy.
- 2.3. We may allow other people and organisations to use Personal Data we hold about you in the following circumstances:
  - 2.3.1. If we, or substantially all of our assets, are acquired or are in the process of being acquired by a third party, in which case Personal Data held by us, about our customers, will be one of the transferred assets.
  - 2.3.2. If we have been legitimately asked to provide information for legal or regulatory purposes or as part of legal proceedings or prospective legal proceedings.
  - 2.3.3. We employ companies and individuals to perform functions on our behalf and we may disclose your Personal Data to these parties for the purposes set out in clause 2.1 or, for example, for fulfilling orders, delivering packages, sending postal mail and email, removing repetitive information from customer lists, analysing data, providing marketing assistance, providing search results and links (including paid listings and links) and providing customer service. Those parties are bound by strict contractual provisions with us and only have access to Personal Data needed to perform their functions, and may not use it for other purposes. Further, they must process the Personal Data in accordance with this Privacy Policy and as permitted by the Data Protection Act 1998. From time to time, these other people and organisations to which we may pass your Personal Data may be outside the European Economic Area. We will take all steps reasonably necessary to ensure that your Personal Data is treated securely and in accordance with this Privacy Policy and the Data Protection Act 1998.
- 2.4. Where you give us Personal Data on behalf of someone else, you confirm that you have provided them with the information set out in this Privacy Policy and that they have not objected to such use of their Personal Data.

### 3. Protecting Information

We have strict security measures to protect Personal Data.

- 3.1. We maintain physical, electronic and procedural safeguards in connection with the collection, storage and disclosure of personally identifiable customer information.
- 3.2. It is important for you to protect against unauthorised access to your password and to your computer. Be sure to sign off when you finish using a shared computer.

### 4. The Internet

- 4.1. If you communicate with us using the Internet, we may occasionally email you about our services. When you start working with us we will give you the opportunity to say whether you would prefer us not to contact you by email. You can also always send us an email (at the address set out below) at any time if you change your mind.
- 4.2. Please remember that communications over the Internet, such as emails and webmails (messages sent through a website), are not secure unless they have been encrypted. Your communications may go through a number of countries before they are delivered - this is the nature of the Internet. We cannot accept responsibility for any unauthorised access or loss of Personal Data that is beyond our control.

### 5. Links

- 5.1. The Website may include links to other websites. We do not provide any personally identifiable customer Personal Data to these third-party websites.
- 5.2. These third-party websites, or Internet advertising companies working on their behalf, sometimes use technology to send (or 'serve') the advertisements that appear on the Website directly to your browser. They automatically receive your IP address when this happens. They may also use cookies, JavaScript, web

beacons (also known as action tags or single-pixel gifs), and other technologies to measure the effectiveness of their ads and to personalise advertising content. We do not have access to or control over cookies or other features that they may use, and the information practices of these third-party websites are not covered by this Privacy Policy. Please contact them directly for more information about their privacy practices. In addition, the Network Advertising Initiative offers useful information about Internet advertising companies (also called 'ad networks' or 'network advertisers'), including information about how to opt-out of their information collection.

5.3. We exclude all liability for loss that you may incur when using these third party websites.

## 6. Further Information

- 6.1. If you would like any more information or you have any comments about our Privacy Policy, please either write to us at Data Protection Manager, African Private Office LLP, 5 Empingham Road, Stamford, PE9 2RH, or email us at [info@africanprivateoffice.com](mailto:info@africanprivateoffice.com).
- 6.2. We may amend this Privacy Policy from time to time without notice to you, in which case, we will publish the amended version on the Website. You confirm that we shall not be liable to you or any third party for any change to this Privacy Policy from time to time. It is your responsibility to check regularly to determine whether this Privacy Policy has changed.
- 6.3. You can ask us for a copy of this Privacy Policy and of any amended Privacy Policy by writing to the above address or by emailing us at [info@africanprivateoffice.com](mailto:info@africanprivateoffice.com). This Privacy Policy applies to Personal Data we hold about individuals. It does not apply to information we hold about companies and other organisations.
- 6.4. If you would like access to the Personal Data that we hold about you, you can do this by emailing us at [info@africanprivateoffice.com](mailto:info@africanprivateoffice.com) or writing to us at the address noted above. There may be a nominal charge of £10 to cover administrative costs.
- 6.5. We aim to keep the Personal Data we hold about you accurate and up to date. If you tell us that we are holding any inaccurate Personal Data about you, we will delete it or correct it promptly. Please email us at [info@africanprivateoffice.com](mailto:info@africanprivateoffice.com) or write to us at the address above to update your Personal Data.