



Data Protection Policy

For the purposes of this policy Foveal shall mean Foveal LLP. We undertake our obligation to keep information about you both confidential and secure seriously at all times. We maintain policies for the collecting, using, securing, and sharing of personal and/or non-public information ("Customer Information"). Specifically:

- We will not sell or divulge any non-public personal information about you to anyone except as is required by law.
- We will not provide any customer information to third parties for their marketing purposes.
- As we never engage in any investment banking or proprietary trading activities, you can be secure that your customer information can never be used to your unfair advantage.
- Our commitment to privacy will remain in place for former clients as well as prospective clients.

Information we may collect

In the normal course of our business, we may collect and use various types of information which we consider essential for operating our business and providing you with the best possible client service. Such information may include:

- Information regarding your usage of our website (including via online data gathering tools), research offerings and other services which we may provide you with (including services provided by any specialist sales personnel);
- Information we receive from you – in either written or verbal format – regarding your relationship, client agreement and/or transactions with us or others;
- Other general information we obtain about you that is not assembled for the purpose of a client relationship or offering certain products or services that you may request, such as demographic information.

Information Security

We are committed to preventing others from accessing your customer information, and we maintain procedures and technology designed for this purpose. In particular, we restrict access to information about you to senior partners who need to know that information in order to provide you with the best possible products and services.

Foveal will have access to your non-public personal information. Foveal agrees to hold such information in confidence and to comply with this privacy policy.

When dealing with Foveal LLP, all information which we hold on you also falls within the United Kingdom's Data Protection Act 1998.