

HATHAWAY PRIVACY POLICY 2023

Hathaway Investment Management Limited (Company No. 03849924) – “we”, “us”, “our”, “Hathaway” - operates this website (“the/our website”) and the below provisions set out our policy (“Privacy Policy”) on personal/private information (“the/your information”) in our possession, both as a result of its presence and generally.

Any reader’s (“you”, “your”) use of our website is governed by our Terms of Use and if we subsequently proffer services to you, they will be additionally governed by any such terms and conditions as apply.

DATA PROTECTION

For the purposes of the Data Protection Act 2018, the General Data Protection Regulations 2016 and all additions or amendments thereto (jointly and separately “the data regulations”), we are the *data controller* of your personal information, and we are registered with the Information Commissioner’s Office (“the ICO”) under reference no. Z8195025.

In accordance with the regulations, we are required to collect & collate the information fairly and with transparency; our Compliance Officer is responsible in the first instance.

WHAT INFORMATION DO WE COLLECT?

All relevant personal information such as you would provide to obtain a passport, together with financial records as you might use to procure a mortgage etc. and both details of your visits to our website and any other information you provide to us.

Where information comes from third parties such as Companies House, notwithstanding that it may be in the public domain, we will exercise the same discretion over its use as with material provided directly by you.

WHY DO WE COLLECT THE INFORMATION?

Only in order to perform our duties as your investment managers and/or to meet our obligations viz-a-viz HMRC, the FCA, the London Stock Exchange etc.; our contract with clients, describes the circumstances in which we will divulge information to those third parties.

STORAGE & PASSAGE OF THE INFORMATION

All information provided to us is ordinarily stored in the UK and, where electronic records and information *may* be transferred outside the jurisdiction, it will only involve cloud computing/Microsoft etc., with appropriate safeguards; no information is supplied to data centres overseas etc., by us, but we have no control over the use of certain information by HMRC etc.

RETENTION OF THE INFORMATION

In the event of the cessation of a mandate: *e.g.*, on death or the winding up of a trust, we will nonetheless retain the information for as long as is prudent to meet our obligations to you, HMRC, the Stock Exchange etc., etc.

WHAT RIGHTS DO YOU HAVE UNDER THE DATA REGULATIONS?

These are largely common sense and reflect the consolidation of many rights and obligations (not all relating to data) in one place; thus:

You have a right to have access to your information and to know what we hold and where we are holding it and/or to whom we have passed it and when.

You have the right to require us to correct or to delete your information and to restrict its processing and we will comply with all reasonable requests in this behalf (and as above) in a timely way.

The only time we reserve the right (reasonably) to vary or to suspend these rights etc., is where we are required so to do by a legal authority such as HMRC, the FCA etc.; in such circumstances, we will keep you informed at all material times.

COOKIES

Please refer to our separate Cookie Policy.

To discuss this Privacy Policy with us, or any other matter, please contact us using the details provided on our website.

For independent information on the data regulations, see the ICO website: www.ico.org.uk.

HATHAWAY INVESTMENT MANAGEMENT LIMITED
March 2023