

Privacy Notice

Scope and purpose

Our Privacy Notice explains how we use your personal data and describes the categories of personal data we process and for what purposes. We are committed to collecting and using such data fairly and in accordance with the requirements of the General Data Protection Regulation (GDPR).

We take your privacy seriously and you can find out more here about your privacy rights and how we gather, use and share your personal information.

Who we are

Asset Intelligence Limited acts as a data controller for the personal information we process about you when providing discretionary investment management services.

Where we receive your information from an introducing IFA firm acting on your behalf, that firm may also act as a controller of your information in its own right; please refer to that firm's own privacy notice for how it uses your information.

Your privacy rights

You have the right to see what personal information we hold about you and you can ask us to correct inaccuracies, delete or restrict personal information or ask for some of your personal information to be provided to someone else. You have the right to object to how we use your personal information.

- **Right to withdraw consent:** Where you have given us your consent to use personal information, you can withdraw your consent at any time.
- **Access to your personal information:** You can request access to a copy of your personal information. We will not normally charge for providing this information to you.
- **Portability:** You can ask us to provide you or a third party with some of the personal information that we hold about you in a commonly used electronic form.
- **Rectification:** You can ask us to change or complete any inaccurate or incomplete personal information held about you.
- **Erasure:** You can ask us to delete your personal information where it is no longer necessary for us to use it, you have withdrawn consent, or where we have no lawful basis for keeping it. Note that we might be required by regulations to retain your information even if you want it to be deleted.
- **Right to object:** You can object to our processing of your personal information for marketing purposes.
- **Restriction:** You can ask us to restrict the personal information we use about you where you have asked for it to be erased or where you have objected to our use of it.

If you need to contact us in relation to any of your rights or wish to make a complaint about how we have used your personal information, you can use the contact details indicated below:

- **Write to us:** Asset Intelligence, 340 Melton Road, Leicester, LE4 7SL
- **Email us:** compliance@asset-intelligence.com
- **Contact the Information Commissioner:** ico.org.uk/global/contact-us

How we gather personal information

We hold a volume of data relating to the underlying investors in the portfolios we manage, obtained principally from platforms and from the IFA firms who instruct us.

We obtain personal information:

- from investment platforms, who provide us with data such as client names, plan/product types and valuations, for the purposes of monitoring assets under management and portfolio performance;
- from the IFA firm, where relevant to the administration of a specific product you hold (e.g. Structured Income);
- occasionally directly from you, where you sign up to receive our communications.

What kinds of personal information we use

The data we use falls into the following categories:

- **Platform data:** obtained from platforms, for example valuations, plan types and investment strategies;
- **Product data:** where necessary to administer your portfolio, for example Structured Income;
- **Personal data:** when you have supplied it to us, e.g. email address.

How we use your personal data

We hold your personal information as Data Controllers in accordance with the requirements of the Data Protection Act 2018 and the UK General Data Protection Regulation, together referred to as the 'Regulations'.

Where we do process personal information, we use it for limited purposes: to monitor and report on assets under management, flows and portfolio performance across the platforms and distribution channels through which our portfolios are held; to send email newsletters and investor updates; and, in relation to certain products such as Structured Income, to administer the operation of that product. We do not use personal information to inform the discretionary management of the model portfolios themselves, which is carried out at an aggregate, portfolio level.

We will not share your information with any other party except as indicated in this Privacy Statement or where required to do so by any statutory, governmental or regulatory body for legitimate purposes.

Keeping personal information

We keep your personal information securely for as long as we need to for the purpose of managing your portfolio under the terms of the mandate agreed with your adviser on your behalf, or for as long as we are required to by relevant regulations.

Legal basis for collecting/processing information

Given the limited nature of the personal information we process, the legal basis will typically be: our legitimate interests, where platform data (e.g. names, plan types, valuations) is used to monitor assets under management and portfolio performance; your consent, where you have opted in to receive email newsletters or investor communications; or contractual necessity, where information is needed to administer a specific product you hold, such as Structured Income.

We do not seek or process special category data, such as health information, in our role as a discretionary fund manager. Where you have given us consent (for example, to receive marketing communications), you have the right to withdraw it at any time.

Approved July 2026