

The Investment Company plc

Privacy Notice

1. ABOUT THIS NOTICE

This website accessible at www.theinvestmentcompany.com (the "Site") is operated by The Investment Company plc, ("we", "us" or "our").

Your privacy and the protection of your personal data is very important to us. This Privacy Notice ("Notice") explains how we look after the personal data that you provide to us, or that we collect when you visit the Site (regardless of where you visit it from) and tells you about your privacy rights and how the law protects you.

This Notice does not apply to any other data, including personal data, that we collect offline or that is processed by us, Dowgate Wealth Limited, or any other third parties in relation to any other products or services provided to you.

By accessing this Site, you acknowledge that you have read and agree to the practices described in this Notice.

2. ABOUT US

Our full company name is The Investment Company plc. We are incorporated and registered in England and Wales (company number 00004205), with our registered office at The Office Suite, Den House, Den Promenade, Teignmouth, TQ14 8SY.

For the purposes of data protection laws, including the Data Protection Act 2018 and the General Data Protection Regulation 2018, as incorporated into UK law (the "GDPR") we are the controller of personal data processed in connection with your access to and use of the Site.

3. YOUR RIGHTS

You may also have the following rights with respect to your personal data:

- to request a copy of the information that we hold about you;
- to request that we correct any of your personal data if it is found to be inaccurate or out of date;
- to request your personal data to be erased where it is no longer necessary for us to retain such data;
- to withdraw your consent to the processing of your personal data at any time;
- to request that we provide you with your personal data, and where possible, to transmit the data directly to another data controller (known as the right to data portability);
- where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing;
- to object to the processing of your personal data with regards to Direct Marketing;

- to lodge a complaint directly with us; and
- to lodge a complaint with your local data protection authority, such as the Information Commissioner's Office (the "ICO") in the UK.

If you would like to exercise any of these rights, please contact us using the information provided in the "Contact Us" section of this Notice. Please note that the exercise of some of the rights above are subject to exceptions. We will inform you if we intend to rely on one of those exceptions in our response to your request.

In some exceptional cases, we may make a small charge for this service (for example multiple claims for the same information), but usually this data will be provided free of charge.

3.1 RIGHT TO COMPLAIN

As detailed above, you have the right to complain to us if you believe we have infringed Data Protection Legislation during the processing of your data. If you have any concerns about the way in which your personal data is being processed, please contact us at the addresses provided in the "Contact Us" section of this Notice.

We will acknowledge receipt of your complaint within 30 days of receipt and respond without undue delay.

4. WHAT PERSONAL DATA DO WE COLLECT?

Personal data is any information that enables us to identify you, either directly or indirectly in conjunction with any other information we hold, by reference to an identifier such as name, address, date of birth or government identification number.

We use different methods to collect personal data from and about you including through:

- **Personal data you give us.** You may give us your personal data including name and contact details, by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you ask us about, or apply for, our products or services; subscribe to our services or publications; request marketing to be sent to you or give us some feedback.
- **Personal data we collect.** As you interact with our Site, we may automatically collect technical data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies.

Please see our Cookie Policy for further details.

5. HOW DO WE USE YOUR PERSONAL DATA?

We comply with our obligations under the applicable data protection law by keeping personal data up to date; by storing and destroying it securely; by not collecting or retaining excessive amounts of data; by protecting personal data from loss, misuse, unauthorised access and disclosure and by ensuring that appropriate technical and organisational measures are in place to protect personal data.

We will store and process your personal data on servers located in the United Kingdom.

5.1 MARKETING

We would like to send you information about products and services of ours and other companies within our group which may be of interest to you. If you receive marketing from us, you may opt out at any time.

You have the right at any time to ask us to stop from contacting you for marketing purposes or giving your information to other entities within our group. If you no longer wish to be contacted for marketing purposes, please email or write to us using the information provided in the 'Contact Us' section of this Notice.

5.2 ARTIFICIAL INTELLIGENCE ("AI")

Where appropriate, we may use AI and other automated technologies to assist in reviewing and analysing communications. These technologies may generate transcripts and summaries and assist us in: monitoring compliance with legal and regulatory requirements, including the FCA's Consumer Duty; assessing the suitability and appropriateness of advice; identifying customer vulnerability; monitoring adviser conduct and competency; reviewing the quality and clarity of client communications; identifying complaints or dissatisfaction; supporting anti-money laundering and financial crime monitoring; detecting potential market abuse indicators; monitoring financial promotions and communication standards; and improving the quality, consistency and efficiency of our services. AI-assisted processing supports us but does not replace appropriate human oversight where required.

6. OUR BASES FOR COLLECTING AND USING YOUR PERSONAL DATA

We will use your personal data for the following purposes:

Type of Personal Data	Purpose for processing	Lawful basis for processing, including basis of legitimate interest
Identity and contact data (name, contact details)	To confirm your identity; to respond to your questions, and to provide related customer services.	For the performance of a contract we have entered into with you. Where necessary for the purposes of our legitimate interests, in ensuring we provide professional and accurate services, except where such interests are overridden by your rights and interests.
Identity and contact data (name, contact details)	To inform you of changes made to our Site and other services.	For the performance of a contract we have entered into with you. Where necessary for the purposes of our legitimate interests in ensuring we provide professional and accurate services, except

		where such interests are overridden by your rights and interests.
Identity and contact data, Profile Data	To conduct marketing and commercial activities and to market relevant offers and promotions to you; to assess your needs and interests in order to better tailor offers and/or advertising.	Where legally required, with your prior consent. Otherwise, where necessary for the purposes of our legitimate interests to carry out direct marketing, develop our products and services, and grow our business by identifying products, services and events that may be of interest to you, except where such interests are overridden by your rights and interests.
Technical/Usage Data (equipment, browsing actions, patterns)	To monitor and protect the security of our information, systems and network; to ensure that content from our Site is presented most effectively for you and your computer; to display content based on your interests; to improve our Site and for internal business intelligence purposes, to conduct research, product development and enhancement.	Where necessary for the purposes of our legitimate interests, (a) protecting the security and integrity of our IT systems, network and information assets; (b) improving our website, products and services and enhancing user experience; and (c) ensuring our content is relevant and accessible to our audience, except where such interests are overridden by your rights and interests.

7. SHARING YOUR PERSONAL DATA

Your personal data will be treated as being strictly confidential. We may share your personal data with the parties set out below for the purposes set out in this Notice:

- A member of our group;
- Companies that provide services to help us confirm your identity, meet our compliance and regulatory obligations, and to detect and prevent fraud or other financial crime;
- Our professional advisors such as auditors, accountants and lawyers, etc;
- Companies that provide services to help us with our business activities, such as data storage, maintenance services, database management, web analytics and payment processing;

- Other companies that provide services to us such as our manager, registrar, custodian and intermediary;
- Companies that provide AI-enabled services to help us with securely integrating data across our internal systems, workflow automation, operational reporting, management information, document management and AI-assisted analysis to support the delivery of our services and our regulatory obligations; and
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets.

Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this Notice.

We may also disclose your personal data as required by law, such as to comply with a subpoena, or a similar legal process, when we believe in good faith that disclosure is necessary to protect our rights, protect your safety or the safety of others, investigate fraud, or respond to a government request, and to any other third party with your prior consent to do so, unless notification is prohibited by the applicable law.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

Where personal data subject to UK data protection laws is shared by us with a third party located in a country that has not received an adequacy decision from the UK Government, we will only share such personal data subject to appropriate safeguards, which comply with the data protection laws and provide you with enforceable rights and remedies.

8. HOW LONG DO WE KEEP YOUR PERSONAL DATA?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements, after which time it will be destroyed securely if it is no longer needed for the lawful purposes for which it was obtained.

In some limited cases, it may be necessary to retain your personal data for longer, for example if we need to hold it for liability claim purposes (e.g. if any complaints were to be made to an ombudsman service), and for example to hold and provide to a regulatory body.

If you consent to receive marketing from us, any information we use for this purpose will be held by us until such time as you notify us that you no longer wish to receive marketing information from us.

9. AUTOMATED DECISION MAKING

We do not use automated decision making in connection with the data processing activities described in this Notice.

10. FURTHER PROCESSING

If we wish to use your personal data for a new purpose, not defined by this Notice, then we will provide you with a new notice explaining this new use prior to the commencement of the new processing and setting out the relevant purposes and processing conditions. Where and whenever necessary, we will seek your prior consent to the new processing.

11. CHANGES TO THIS PRIVACY NOTICE

We will update this Notice from time to time, so please check back periodically.

The provisions contained in this Notice supersede all previous notices or policies regarding our use of personal data.

12. CONTACT US

To exercise all relevant rights, or to raise queries or complaints, please contact us via the postal or email addresses below:

By email Compliance@Dowgate.co.uk

By post: The Investment Company plc The Office Suite, Den House, Den Promenade, Teignmouth, TQ14 8SY