

PRIMARY

Data Protection Policy

Policy information	
Organisation	<p>The Data Controller is Primary Access & Research Limited, a limited company registered in England and Wales (registration number 11797918) the registered office of which is at 14 Old Queen St, London SW1H 9HP. You can contact the data controller by writing to Primary Access & Research Ltd, at the above address, or sending an email to david@primaryaccess.co.uk.</p> <p>Primary Access & research have no Data Processors, in relation to personal data, i.e. any person (other than an employee of the data controller) who processes the data on behalf of the data controller.</p>
Policy operational date	29/05/2019
Policy prepared by	David Stanistreet, Director.
GDPR	The European General Data Protection Regulation, came into force on 25 th May 2018 and is the basis of this Data Protection Policy.

Introduction	
Purpose of policy	<p>This Data Protection Policy sets out how we, Primary Access & Research Limited, collect, store and use information about you when you use our website, https://www.primaryaccess.co.uk and where we otherwise obtain or collect information about you.</p> <p>The reasons for the policy are to comply with the law, follow good practice, to protect clients, staff and other individuals and to protect the company.</p>
Types of data	We collect individual information from our company staff and individual and company information from consumers of our research.
Policy statement	<p>This Data Protection Policy complies with both the law and good practice and respects individuals' rights. The company will be open and honest with individuals whose data is held and provide training and support for staff who handle personal data, so that they can act confidently and consistently.</p> <p>In the event of data breaches the Supervisory Authority (the ICO) will be notified within 72 hours. In addition, for major breaches the data subjects will be notified without delay. A personal data breach means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data.</p>

Responsibilities

The Board / Company Directors	The Board has overall responsibility for ensuring that the organisation complies with its legal obligations.
Data Protection Officer	The Data Protection Officer's responsibilities include: <ul style="list-style-type: none"> • Briefing the Board on Data Protection responsibilities • Reviewing Data Protection and related policies • Advising other staff on Data Protection issues • Ensuring that Data Protection induction and training takes place • Notification to the ICO if required • Handling subject access requests • Approving unusual or controversial disclosures of personal data • Approving contracts with Data Processors
Employees	All staff should read, understand and accept any policies and procedures that relate to the personal data they may handle in the course of their work.

Types of information collected	
Individuals' names	We record the names and contact details of the individuals within institutions with whom we have research supply agreements.
Business name and contact details	We record the names, 'know your client' information and contact details of the institutions with which we have research supply agreements.
Updating	We have a regular cycle of checking, updating or discarding old data on our staff and research clients.

Lawful basis for processing information	
Underlying principles	<p>The lawful basis for the personal data processed is one or more of the following, described in Article 6 (1) of the General Data Protection Regulation:</p> <p>(a) Consent: the individual has given clear consent for us to process their personal data for a specific purpose.</p> <p>(b) Contract: the processing is necessary for a contract we have with the individual, or because they have asked us to take specific steps before entering into a contract.</p> <p>(c) Legal obligation: the processing is necessary for us to comply with the law (not including contractual obligations).</p> <p>(d) Vital interests: the processing is necessary to protect someone's life.</p> <p>(e) Public task: the processing is necessary for us to perform a task in the public interest or for our official functions, and the task or function has a clear basis in law.</p> <p>(f) Legitimate interests: the processing is necessary for our legitimate interests or the legitimate interests of a third party unless there is a good reason to protect the individual's personal data which overrides those legitimate interests.)</p> <p>Data collected from our research clients is on the basis of (b) Research contracts and (f) Our legitimate interests.</p>

	Data collected from our Appointed Representatives is on the basis of (a) Consent, (b) AR Agreements, (c) Legal obligations and (f) Our legitimate interests.
Withdrawing consent	Once given, consent can be withdrawn, but not retrospectively. There may be occasions where Primary Access & Research Ltd. has no choice but to retain data for a certain length of time, even though consent for using it has been withdrawn.

How information is collected and stored	
Web server information	We do not currently, but will in future record the name, email address, postal address and telephone number of individuals filling in the form on the Contact page on the website. This information is not transferred outside the EEA and is stored on our own web server in the United Kingdom. You may request to have this removed at any time.
Cookies	Primary Access website does not use cookies.
Email	We collect and store emails on business related personal computers and on our external email server in the United Kingdom linked to Office 365 and related product suites. Information is not transferred outside the EEA.
Hard drive and back ups	We store information on the hard drives of our office and business computers and back it up on Office 365.
Disclaimer	<p>Transmission of information over the internet is not entirely secure, and if you submit any information to us over the internet (whether by email, via our website or any other means) you do so entirely at your own risk.</p> <p>We cannot be responsible for any costs, expenses, loss of profits, harm to reputation, damages, liabilities or any other form of loss or damage suffered by you as a result of your decision to transmit information to us by such means.</p>
Phone	We log all telephone calls with research clients for monitoring purposes but do not record conversations.
Paper copies	Information from compliance procedures, such as on-boarding, research handling and quarterly compliance meetings, is stored on hard copy files and kept in secure storage.

Disclosure and use of information	
Commitment	<p>Primary Access & Research Ltd is committed to ensuring that Data Subjects are aware that their data is being processed and</p> <ul style="list-style-type: none"> • for what purpose it is being processed • what types of disclosure are likely, and • how to exercise their rights in relation to the data
Delivering research	We retain contact details of research clients so that we can provide them with research products in accordance with the Agreements we have with them.

Your rights in relation to your information	
Your rights in relation to information	<p>Subject to certain limitations on certain rights, you have the following rights in relation to your information, which you can exercise by contacting the Data Protection Officer by email at david@primaryaccess.co.uk, in writing to: Primary Access & Research Ltd, 14 Old Queen St., London SW1H 9HP, or by phone on 00 44 (0)203 915 5615:</p> <ul style="list-style-type: none"> - to request access to your information and information related to our use and processing of your information; - to request the correction of your information; - or request the erasure of personal data (right to be forgotten) providing there is no overriding legitimate grounds; - to request that we restrict our use of your information; - to receive information which you have provided to us in a structured, commonly used and machine-readable format (e.g. a CSV file) and the right to have that information transferred to another data controller; - to object to the processing of your information for certain purposes; and - to withdraw your consent to our use of your information at any time where we rely on your consent to use or process that information. Please note that if you withdraw your consent, this will not affect the lawfulness of our use and processing of your information on the basis of your consent before the point in time when you withdraw your consent. <p>The controller will provide information on action taken on request to the data subject without undue delay and in any event within one month of receipt of the request.</p> <p>In accordance with Article 77 of the General Data Protection Regulation, you also have the right to lodge a complaint with a supervisory authority, which is the Information Commissioner's Office (ICO), whose website is below.</p>

Employee training & acceptance of responsibilities	
Induction	All employees of Primary Access & Research Ltd and those who have access to any kind of personal data will have their responsibilities outlined during their induction procedures.
Continuing training	Data Protection issues will be covered during employee training, team meetings, supervisions, etc.

Further information	
For more information	https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/

Primary Access & Research Ltd is an appointed representative of Messels Ltd., authorised and regulated by the Financial Conduct Authority

This message contains privileged and confidential information. It is solely for the information of the addressee and is not an offer, or solicitation of an offer, to sell or buy any securities or any derivative instrument or any other rights pertaining thereto. If it was sent to you in error please do not

read it. Instead, please notify the sender by reply email and delete this email. Unauthorised dissemination, forwarding or copying of this email is strictly prohibited.

Information in this email and any attachment(s) is confidential, and may not be copied or used by anyone other than the addressee, nor disclosed to any third party without the express permission of Primary Access & Research Ltd. There is no intention to create any legally binding contract or other binding commitment through the use of this electronic communication unless it is issued in accordance with the Primary Access & Research standard terms and conditions of business, or other express written agreement between Primary Access & Research Ltd and the recipient.

Primary Access & Research Ltd, 14 Old Queen Street, London SW1H 9HP.

UK company registration number 11797918