AlphaReal

Real assets. Real security.

Privacy Policy

Information on this site

This Privacy Policy sets out how Alpha Real Capital LLP ("AlphaReal", "we", "our" or "us") collects, uses and protects your personal information, including that obtained through our website (www.alphareal.com) or other online services, directly from you in relation to our services or from a third party in relation to our services. Personal information is information which identifies you or another person, or which is capable of doing so.

Key points

- AlphaReal is the data controller of personal information processed through your use of our website or services or that we otherwise obtain for the purposes of marketing our services.
- The type and nature of the personal information processed by us includes data relating to the use of our website, data relating to the services that we provided to investors and/or advisers, data relating to contracts that we enter into and data related to our correspondence with you.
- We use data to provide you services, perform background checks in order to perform our services, analyse the performance of our services, perform a contract with you, provide our site, respond to queries, and for business development purposes.
- We may send you marketing materials relating to our services which you can opt out of at any time.
- You have a number of rights that you may exercise in relation to our use of your personal data, and you may exercise these by contacting us through the communication methods set out in the 'Contact' section below.

You can find information about us and how we collect, use and store your personal data in each section of this Privacy Policy:

- About AlphaReal and this Privacy Policy
- Information we collect from you
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About AlphaReal and this Privacy Policy

AlphaReal is (a) authorised and regulated by the Financial Conduct Authority (FCA), and (b) registered in England and Wales as a limited liability partnership under company registration number OC312705, with a registered address of 338 Euston Road, London, NW1 3BG.

AlphaReal is data controller for the purposes of data protection legislation and is subject to the jurisdiction of the Information Commissioner's Office (ICO) in the UK.

We are committed to maintaining the privacy and security of the information you provide to us, and the choices you have regarding our collection and use of your information. This Privacy Policy applies to information we collect about you through our website and when you otherwise communicate with us. We will only process personal information you provide to us in accordance with applicable data protection laws.

If you have any questions about this Privacy Policy or our use of your personal information you can contact us at info@alphareal.com. You also have the right, to make a complaint to the relevant authority about our use of your personal information, which in most cases would be the ICO.

This Privacy Policy may change from time to time and, if it does, the latest version will be available on our website (and, where appropriate, brought to your attention). This privacy policy was last updated on May 2018.

Information we collect from you

We collect and process the following data about you:

- Information that you provide by filling in forms on the website or via our web portal. This includes information provided at the time of registering to use our site, or requesting further services, as well as your continued use of the site and our web portal. We may also ask you for information when you report a problem with our site ("Website Data").
- If you contact us or use the web portal, we keep a record of that correspondence and usage ("Correspondence Data").
- We may also ask you to complete surveys that we use for research purposes, although you do not have to respond to them ("Survey Data").
- Details of your visits to our site and the web portal including, but not limited to, traffic data, location data, IP address and device ID (and associated operating system and browser type data), cookie data (further details in the next section) and other communication data ("Technical Data").

- Information from application forms, contracts or other correspondence relating to our products, such as your name, age, date of birth, gender, postal address, email address, phone number, nationality, national insurance/ tax number, bank details, FCA/ LEI number (if you are an adviser) ("Contract Data"). Where you act as an investor, we may receive your Contract Data via a financial adviser;

- Information from third party sources, to be used for business development and direct marketing purposes, such as your name, email address, phone number and postal address ("Business Development Data").

Uses made of your information

Our uses of your information, and the lawful grounds on which we process your data under data protection laws, will depend on who you are.

If you are a general user of our website or web portal (or any other online services that we provide), we use your information as follows:

- We use Website Data, Technical Data, Cookie Data and Survey Data on the basis of our legitimate interest:
    - to customise our website or web portal or other online services according to your interests – we have a legitimate interests to use data about how you use the site to tailor it to you and to other similar users;
    - to ensure that content from our site is presented in the most effective manner for you and for your computer – we have a legitimate interest to provide online content in the way which we think makes it most suitable for you to use and the way that benefits your use;
    - to administer the website and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey responses – we have a legitimate interest to use user data in order to assess which parts of our online services are functioning best so that we can provide services which are useful to you;
    - as part of our efforts to keep the website safe and secure – we have a legitimate interest to ensure that the security of our online services are maintained, for the benefit of all users as well as for us as a business; and
    - to measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you – we have a legitimate interest to advertise our products and services to you and other users via online means, so that you can see adverts for products and services which are more likely to be of interest to you.
- We collect, store and use Website Data and Correspondence Data insofar as it is necessary in order for us to provide you with access to our website and our services (i.e. where it is necessary for performance of a contract) in order to:
    - respond to any query that you may submit to us; and
    - provide any online service which we agree to provide to you.

If you are an investor who we are providing our services for, we use your information as follows:

- We use Contract Data, Website Data, Correspondence Data and Survey Data on the basis of our legitimate interest:
    - to assess the performance of your investment – we have a legitimate interest to see how your portfolio is performing in order to better understand which types of investments to engage with for our entire investor base;
    - to analyse the suitability of, and to improve, our products – we have a legitimate interest to assess whether our products are suitable for our investor and adviser base and to analyse how they can be improved; and
    - to notify you about changes to our services – we have a legitimate interest to let you know about any changes to our services which are likely to impact on the products and services that we are providing to you.
- We collect, store and use Contract Data, Website Data and Correspondence Data insofar as it is necessary for performance of a contract in relation to:
    - our provision of our website and web portal to you;
    - any investment contracts entered into by you with us or third parties;
    - our performance of advisory or other contracts entered into between you and us; and
    - manage or administer your investment and provision of related services.
- We collect, store and use Contract Data insofar as it is necessary in order for us to comply with our legal obligations for:
    - know-your-client purposes before a contract is entered into with you;
    - compliance with anti-money laundering, tax and other legal requirements related to the services that we provide to you; and
    - compliance with a request pursuant to any law, regulatory or governmental body or law enforcement agency.

If you are an adviser (e.g. acting on behalf of an investor or prospective investor) or a commercial counterparty that we interact with in the course of our business or services, we use your information as follows:

- We use Contract Data, Website Data, Correspondence Data, Business Development Data and Survey Data on the basis of our legitimate interest:
- to assess the performance of investments which you have helped to arrange – we have a legitimate interest to see how portfolios which you are involved with are performing in order to better understand which types of investments to engage with for our entire investor base;
- to analyse and improve our products – we have a legitimate interest to assess whether our products are suitable for our investor and adviser base and to analyse how they can be improved;

- to engage with you, for example by sending direct marketing in relation to industry updates or new products which we think may be of interest to you, by post, telephone or email – we have a legitimate interest to communicate with you about products or services which we think that you might be interested in, as long as you have not opted-out of receiving such communications; and

- to notify you about changes to our service – we have a legitimate interest to let you know about any changes to our services which are likely to impact on the products and services that we are providing to you or the investors that you act for.

- We collect, store and use Contract Data, Website Data and Correspondence Data insofar as it is necessary in order for us to provide you with access to our website and our services (i.e. where it is necessary for performance of a contract) in order to carry out our obligations arising from any contracts entered into between you and us.

- We collect, store and use Contract Data insofar as it is necessary in order for us to comply with our legal obligations for:

- know-your-client purposes before a contract is entered into with you;

- compliance with anti-money laundering, tax and other legal requirements related to the services that we provide to you; and

- compliance with a request pursuant to any law, regulatory or governmental body or law enforcement agency.

Where we store your information

The data that we collect from, or about you may be transferred to, and stored at, a destination outside the European Economic Area (EEA) including in the Channel Islands. It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. Such staff maybe engaged in, among other things, the provision of support services. Please be aware that, while countries which are outside the EEA may not offer the same level of data protection as the United Kingdom, we will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy, including entering into European Commission-approved standard contractual clauses or, where applicable, transferring to an entity which is Privacy Shield certified.

All information you provide to us is stored on our secure servers. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone. Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data while it is being transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

Disclosure of your information

We may share your Personal Information with any member of our group, which means our subsidiaries, our ultimate parent entity and its subsidiaries.

When we share your information with third parties they will process your information as either a data controller or as our data processor and this will depend on the purposes of our sharing your personal information. We will only share your personal information in compliance with the applicable data protection legislation.

We may disclose your personal information:

- in the event that we sell or buy any business or assets, in which case we will disclose your personal data to the prospective seller or buyer of such business or assets;

- if any of our assets are acquired by a third party, in which case personal information we hold will be one of the transferred assets;

- to IT infrastructure companies and IT support providers who help us to provide our site and services, for example Microsoft Cloud Services Limited and Ramsac Limited;

- to service providers who assist us with the provision of our services (such as to screening providers, credit reference agencies, fraud detection agencies, event organisers, mailing houses and financial product partners), for example Thomson Reuters World Check;

- to strategic partners for business development and direct marketing purposes such as Intelligent Partnership;

- if we are under a duty to disclose or share your personal information in order to comply with any legal obligation or court order, or in order to enforce or apply our terms of use or terms and conditions of supply and other agreements; or to protect the rights, property, our safety, our customers, or others.

We will not rent or sell your personal information to any other organisation or individual.

Data retention

We will retain information (including personal information) for the following time periods:

- Correspondence Data, and Contract Data is retained for six years after the end of the financial year that we stop using such data in relation to (a) investment management or (b) any other services that we actively provide to you from time to time;

- Technical Data, Website Data and Survey Data is retained for two years after the end of the calendar year that such data was obtained by us;

- Business Development Data is retained for one year from the last communication that was made by (or on behalf of) us using such data, unless you ask us to stop using your data for such purposes.

We will delete information after the periods set out above except where we need to keep any personal information to comply with our legal obligations, resolve disputes, or enforce our agreements. The third parties we engage to provide services on our behalf will keep your data stored on their systems for as long as is necessary to provide the services to you.

Your rights

You have the following rights:

- the right to ask us to provide you with copies of personal information that we hold about you at any time;
- the right to ask us to update or correct any out-of-date or incorrect personal information that we hold about you (in accordance with applicable data protection laws);
- the right to ask us not to process your personal data for marketing purposes. Where we inform you (before, or at the time of, collecting your data) that we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes, you can exercise your right to prevent such processing by checking certain boxes on the forms we use to collect your data. You can also opt-out of any marketing communications by letting us know at info@alpharealcapital.com or, with regards to emails, by clicking the 'unsubscribe' link;
- the right to ask us not to process your personal information for the legitimate interests that we have set out above. In certain circumstances we may not be able to stop using your personal information but, if that is the case, we'll let you know and tell you why; and
- the right to receive the personal information that you have provided to us in a structured, commonly used and machine-readable format, and to transmit that data to another data controller.

If you wish to exercise any of the above rights, please write to us (either by post or by e-mail) at the address specified below.

Third party sites

Our site may, from time to time, contain links to and from the websites of our partner networks and affiliates or those of third parties not linked to us. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies or the content of such third parties' websites. Please check these policies before you submit any personal data to such websites.

Changes to our Privacy Policy

Any changes we may make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail.

Contact

If you have any queries or complaints regarding this Privacy Policy please contact us by email at info@alphareal.com.

We welcome your views about our website and our Privacy Policy. If you would like to contact us with any queries or comments, please send an email to info@alphareal.com or to the Data Manager, 338 Euston Road, London NW1 3BG.

This communication is from Alpha Real Capital LLP (AlphaReal), 338 Euston Road, London NW1 3BG.

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