



LEGAL AND COOKIES

TERMS AND CONDITIONS

DISCLAIMER

The pages on the website ('the website') are published by Chelverton Asset Management Limited ('CAM', 'us' or 'we').

Please read our conditions of use carefully as by accessing the website you have agreed to be bound by them. We reserve the right to vary the conditions of use at any time and will post any variations on this page. You are advised to review the conditions of use on a regular basis as you will be deemed to have accepted variations if you continue to use the website after they have been posted.

Information is published by us and, where indicated, by certain third parties. We take every care and precaution to ensure that information published on the website is accurate when posted and regularly updated, but we do not guarantee its accuracy and we may change the information at any time without notice.

We publish the website without any warranty of any kind, express or implied. The accuracy of the information, the products and services referred to on this website (in so far as such warranties may be excluded under any relevant law); we shall not be liable for any loss or damage that may result from use of the website as a consequence of any inaccuracies in, or any omissions from, the information which they may contain.

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Content and information provided by third parties other than CAM is identified clearly where it appears. We publish this content as supplied to us and are not responsible for its accuracy or timeliness. You must take appropriate steps to verify this information before acting upon it.

We are not responsible for the content of any other website which you have accessed via our website and cannot be held liable for any loss or damage you incur as a result thereof.

These conditions of use are governed by the laws of England and Wales and you agree that the English courts shall have exclusive jurisdiction in any dispute.

To the extent that any part of these conditions of use is found to be invalid, unlawful or unenforceable by any court of competent jurisdiction such part shall to that extent be severed from the remaining terms all of which shall remain in full force and effect as permitted by law.

PRIVACY POLICY

Last updated: 22 May 2018

CHELVERTON ASSET MANAGEMENT", ("we", "us" or "our") respects your privacy and is committed to protecting your personal data.

This Privacy Policy ("Policy") will inform you as to how we look after your personal data that you provide or we collect when you visit <http://chelvertonam.com/> (the "Site") (regardless of where you visit it from) and tells you about your privacy rights and how the law protects you.

This Policy does not apply to any other data, including personal data, that we collect offline.

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

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.

CHELVERTON ASSET MANAGEMENT LIMITED

11 Laura Place, Bath, BA2 4BL T: +44 (0)1225 483 030 W: www.chelvertonam.com

Authorised and regulated by the Financial Conduct Authority. Registered in England: Company number 3429348



For the purposes of the EU General Data Protection Regulation 2018 (the "GDPR") we are the controller of personal data and responsible for the Site.

WHAT PERSONAL DATA DO WE COLLECT?

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 below for further details.

HOW DO WE PROCESS PERSONAL DATA?

We comply with the 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, unauthorized access and disclosure and by ensuring that appropriate technical and organisational measures are in place to protect personal data.

We will use your personal data for the following purposes:

- To confirm your identity;
- To respond to your questions and provide related customer services;
- To detect and prevent fraud or other financial crime;
- To monitor and protect the security of our information, systems and network;
- For internal business intelligence purposes, to conduct research, product development and enhancement;
- To inform you of changes made to our Site and other services;
- To conduct marketing and commercial activities and to market relevant offers and promotions to you;
- To ensure that content from our Site is presented most effectively for you and your computer;
- To display content based on your interests;
- Enable you to search information on our Site;
- Assess your needs and interests in order to better tailor offers and/or advertising; and
- Improve our Site.

WHAT IS OUR LEGAL BASIS FOR PROCESSING PERSONAL DATA?

Under Article 6 (1b) of the GDPR, the legal basis that we employ for processing your personal data is that processing of your personal data is necessary for the performance of a contract to which you, the 'data subject' is party, or in order to take steps at your request prior to entering into such a contract.

We also process your personal data under Article 6(1f) of the GDPR where processing is necessary for the purposes of our legitimate commercial interests, except where such interests are overridden by your rights and interests.

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 Policy:

- 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;
- 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 Policy.

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.

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Where personal data relating to European based data subjects is shared with a third party located in a non-EU country that has not received an adequacy decision by the European Commission, we rely on appropriate safeguards.

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 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.

ACCESS TO YOUR PERSONAL DATA AND CORRECT

You have the right to request a copy of the information that we hold about you. If you would like a copy of all or some of your personal data, please email or write to us at the addresses provided in the "Contact Details" section of this Policy.

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.

We want to make sure that your personal data is accurate and up to date. You may ask us to correct or remove information you think is inaccurate.

YOUR DATA PROTECTION RIGHTS

Unless subject to an exemption under the GDPR, you may have the following rights with respect to your personal data:

- to request a copy of your personal data which 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 with an EU Data Protection Authority, such as the Information Commissioner's Office (ICO) in the UK.

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 have consented to receive marketing, you may opt out at a later date.

You have a right at any time to stop us 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 at the addresses provided in the 'Contact Details' section of this Policy.

AUTOMATED DECISION MAKING

We do not use automated decision making to segment and target product offers based on our customers' demands and needs. For further details, you may contact our Data Protection Officer whose details are provided in the 'Contact Details' section of this Policy.

FURTHER PROCESSING

If we wish to use your personal data for a new purpose, not defined by this Policy, 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.

CHANGES TO THIS PRIVACY POLICY

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

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

CONTACT DETAILS

To exercise all relevant rights, or to raise queries or complaints, please in the first instance contact the Data Protection Officer, Vivien Langford.

By email: vel@chelvertonam.com

By post: The Data Protection Officer, Chelverton Asset Management Limited, 11 Laura Place, Bath BA2 4BL

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COOKIE POLICY

Last updated: May 22, 2018

This Cookie Policy applies to Chelverton Asset Management (“we”, “us” or “our”).

Like most businesses, we employ “cookies” or similar technologies. This Cookie Policy tells you about the use of Cookies and similar technologies on <http://chelvertonam.com/> (the “Site”).

When you first access the Site from certain jurisdictions, you will receive a message advising you that cookies and similar technologies are in use. By clicking “accept cookies”, closing the message, or continuing to browse the Site, you signify that you understand and agree to the use of these technologies, as described in this Cookie Policy.

You do not have to accept cookies and consent can be withdrawn at any time (see How to Control Cookies, below). You can change your browser settings to refuse or restrict cookies, and you may delete them after they have been placed on your device at any time. If you do not accept or delete our cookies, some areas of the Site that you access may take more time to work, or may not function properly.

WHAT ARE COOKIES?

Cookies are small files containing a string of characters that we may store on your computer or mobile device when you visit the Site. When you visit the Site again, the cookies allow us to recognize your browser. Cookies may store your preferences and other information but cannot read data off your hard disk or read cookie files created by other sites.

Cookies set by a website owner are called “first party cookies”. Cookies set by parties other than the website owner are called “third party cookies”. Third party cookies enable us to provide third party features or functionality through the Site (i.e. advertising, social media functions and analytics).

THE COOKIES WE USE

Cookies make the use of the Site easier by, among other things, saving your preferences. We may also use cookies to deliver content tailored to your interests. Our cookies may enable us to relate your use of the Site to personal data that you previously submitted.

The information that we collect with cookies allows us to statistically analyze usage of the Site, and to improve and customize our content and other offerings. However, we only disclose information collected with cookies to third parties on an aggregated basis without the use of any information that personally identifies you.

The specific types of first party and third party cookies placed by the Site and the purposes they perform are described in the table below:

Type of Cookies	Who serves these cookies	How to Refuse
Strictly Necessary Cookies These are cookies that are required for the operation of the Site. They include, for example, cookies that enable you to log into secure areas of our websites.	CHELVERTON ASSET MANAGEMENT	These cookies are strictly necessary to deliver the Site and therefore cannot be refused. They can be deleted or blocked using your browser settings, however (see How to Control Cookies, below).
Performance and Functionality Cookies These are used to recognize you when you return to the Site. This enables us to personalize our content for you and remember your preferences (for example, your choice of language or region), but are non-essential to the performance of the Site.	CHELVERTON ASSET MANAGEMENT	These cookies can be deleted or blocked using your browser settings (see How to Control Cookies, below).
Analytical or Customization Cookies These cookies collect information about how users access and move through the Site. We use this information in either aggregate form to help us to improve the way the Site works, or to personalize the Site to your interests.	CHELVERTON ASSET MANAGEMENT Google Universal Analytics	These cookies can be deleted or blocked using your browser settings (see How to Control Cookies, below). Alternatively, please follow the links below to opt-out: Google Universal Analytics https://tools.google.com/dlpage/gaoptout

HOW TO CONTROL COOKIES

When you first access the Site from certain jurisdictions, you will receive a message advising you that cookies and similar technologies are in use. By clicking “accept cookies”, closing the message, or continuing to browse the website, you signify that you understand and agree to the use of these technologies, as described in this Cookie Policy.

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You do not have to accept cookies and consent can be withdrawn at any time, although you may not be able to use certain features on the Site. You can do this by clicking the appropriate opt-out provided in the cookie table above or by activating the settings on your browser that allows you to refuse all or some cookies.

Please follow the links below to helpful information for the most popular browsers:

- Microsoft Internet Explorer:

<https://support.microsoft.com/en-gb/help/17442/windows-internet-explorer-delete-manage-cookies>

- Google Chrome:

<https://support.google.com/chrome/answer/95647?co=GENIE.Platform%3DDesktop&hl=en>

- Mozilla Firefox:

<https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences>

- Apple Safari:

https://support.apple.com/kb/PH21411?locale=en_US

WEB BEACONS

As well as cookies, we may use other technologies to recognize and track visitors to the Site. A web beacon (also known as a "tracking pixel" or "clear GIF") is a clear graphic image (typically a one-pixel tag) that is delivered through a web browser or HTML e-mail, typically in conjunction with a cookie.

Web beacons allows us, for example, to monitor how users move from one page within our websites to another, to track access to our communications.

CHANGES TO THIS COOKIE POLICY

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

The provisions contained in this Cookie Policy supersede all previous notices or policies regarding our use of cookies and similar technology on the Site.

We encourage you to check frequently to see the current Cookie Policy to be informed of how CHELVERTON ASSET MANAGEMENT is committed to protecting your information and providing you with improved content on the Site in order to enhance your experience.

CONTACT DETAILS

To raise queries or complaints about this Cookie Policy or our Site, please in the first instance contact the Data Protection Officer, Vivien Langford.

By email: vel@chelvertonam.com

By post: The Data Protection Officer, Chelverton Asset Management Limited, 11 Laura Place, Bath, BA2 4BL

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