**ICP GROUP**

**PRIVACY NOTICE**

**This Privacy Notice is issued by ICP Holdings Limited for and on behalf of the ICP Group of companies operating in the Lloyd’s Market, including ICP Group Holdings Ltd, ICP General Partner Ltd and ICP Capital Ltd (collectively referred to as “we” “us” and “our” in this Privacy Notice.**

The above companies are all incorporated and registered in England and Wales at the following address:

3 Castlegate

Grantham

Lincolnshire NG31 6SF

We are committed to protecting and respecting your privacy and take our responsibilities regarding the security of client data very seriously.

This Privacy Notice explains how we, as data controller, comply with data protection requirements and how we use any personal data that you provide.

**Personal Data**

* Why we collect and store personal data
* What personal data we collect
* How we use personal data
* Who we share your personal data with
* Your rights as a data subject

Under the General Data Protection Regulation (“GDPR”) personal data is defined as “any information relating to an identified or identifiable natural person (“Data Subject”). An identifiable natural person is one who can be identified, either directly or indirectly, in particular by reference to an identifier such as a name, identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that individual.

**Why we collect, process and store your Personal Data**

Most of the personal data that we collect and process is done for the purpose of entering into a business relationship with you and for the performance of that relationship. We may collect and process personal data both at the outset of a business relationship and on an ongoing basis. The processing of this data allows us to perform our contractual and/or legal obligations. We may also collect and process personal ddata if you contact us enquiring about the service we offer, whether in person, by telephone or by email or when you visit our website.

**What Personal Data we collect**

Details about the individual, such as name, address, other contact details, gender, marital status, date and place of birth, nationality, employer, job title and employment history and family details including their relationships to you.

Details that could be used to identify an individual such as identification numbers issued by government bodies or agencies including your national insurance number, Unique Taxpayer Reference, passport number and driving licence number.

Financial information such as bank account details, income and source of wealth (including from employment, property, shareholdings, inheritance, gifts and other sources) and other financial information.

Credit and anti-fraud data such as credit history, credit score, sanctions, status as a politically exposed person, criminal offences and information from anti-fraud databases.

Special categories of personal data such as health information or criminal conviction data. These types of data will only be collected and stored where necessary for us to fulfil our legal and contractual obligations.

**How we use your Personal Data**

We use your personal data to allow us to provide the management and administration of the service that we offer. We also use your personal data to meet the legal requirements to which we are subject, which includes requirements to identify and verify clients and their source of funds and source of wealth for the prevention of financial crime, audits and any further requirements of public authorities and regulators, including the Financial Conduct Authority and the Corporation of Lloyd’s.

We may also process your personal data where necessary to pursue our legitimate interests, for example to review and improve our services, contact you with market information and our newsletter.

We will keep your personal data only for as long as necessary and for the purpose for which it was collected, following which it will be deleted. The period for which we keep your personal data will include any period which may be necessary for the performance of the contractual relationship between us or where we are required to keep your personal data for legal or regulatory reasons.

**Who we share your Personal Data with**

We do not disclose your personal data to any third party except as stated in this Privacy Notice, as otherwise permitted by law or as authorised by you.

We disclose your personal data, including information in relation to verification of a client’s identity, source of funds and source of wealth, to the Corporation of Lloyd’s for the purpose of administration and oversight of any funds you may lodge in our Funds at Lloyd’s. We may also disclose your personal data to your approved investment manager and your own accountant as well as public or regulatory authorities, including the Financial Conduct Authority and the Corporation of Lloyd’s, in order for us to perform our contact with you or to comply with any legal or regulatory obligations to which we or you are subject both under legislation and Lloyd’s Byelaw requirements.

We may disclose your personal data to other members in our group of companies where this is necessary for the provision of services to you or for other purposes set out in this Privacy Notice.

We may disclose your personal data to other companies who provide services to us including data management, IT, email delivery, website hosting, identity verification, auditing and other third party services or in the event of any merger, sale or other transfer of all or part of our business.

Should we transmit personal data to recipients outside of the UK, we will only do so where there is confirmation that the country has an approved level of data protection or that other appropriate data protection guarantees are in place in compliance with UK Data Protection Legislation.

**Your rights as a Data Subject**

You can write to us to obtain further details of the personal data we hold about you and the purposes for which we use it. Our correspondence address is ICP Holdings Ltd, Irongate House, 30 Duke’s Place, London EC3A 7LP or you can email us enquiries@inscap.co.uk

You may also have the right to require us to:

* Provide you with a copy of the personal data we hold about you
* Update any inaccuracies in the personal data we hold about you
* Delete any personal data that we no longer have a lawful basis to use
* Where processing is based on consent, to withdraw your consent so that we stop that particular processing
* Object to any processing based on our legitimate interests unless our reasons for that processing outweigh any prejudice to your data protection rights

Any requests for additional information or to exercise your rights should be made in writing to the above contact details.

**Your right to lodge a complaint with the Information Commissioner’s Office (ICO)**

If you are not satisfied with our use of your personal data or our response to any request to exercise any of your rights mentioned above, you have the right to complain to the ICO.

The ICO contact details are:

Information Commissioner’s Office

Wycliffe House

Water Lane

Wilmslow

Cheshire SK9 5AF

Telephone: 0303 123 1113

Email: casework@ico.org.uk