

Website privacy policy

JK Investment Management Management LLP respects your privacy and is committed to protecting your personal data. This privacy notice will inform you about how we look after your personal data when you visit our website and tell you about your privacy rights and how the law protects you.

If you have any questions about this privacy policy or how we use your personal data, please contact our Compliance Officer, Mr Francis Kirkpatrick:

Email: fk@jkim.co.uk
Telephone: 01483 401521
Address: Bury House, 3 Bury Street, Guildford, Surrey GU2 4AW.

You have the right to make a complaint about how we have collected or used your personal data at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO, so please Mr Kirkpatrick in the first instance.

Third-Party Links

Our privacy policy relates only to personal information that we obtain about you. If you visit a site operated by a third party through a hyperlink included in this site, your information may be used differently by the operator of a linked site.

The Data We Collect About You and How This Data Is Collected

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity information has been removed (anonymous data).

We use different methods to collect data from and about you including through direct interactions, where you provide us with your details by filling in the 'Get in touch' form via our website. Automated technologies may also collect data, as you interact with our website, about browsing actions and patterns which are collected by using cookies and other technologies. Our Cookie Policy can be found here [[Link to Cookie Policy](#)].

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

- **Identity Data** includes first name, last name, username or similar identifier and title.
- **Contact Data** includes your email address and telephone number.
- **Technical Data** includes internet protocol (IP) address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
- **Usage Data** includes details about which of our services you utilise.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

How We Use Your Personal Data

We will only use your personal data when the law allows us to. Your information will be used to administer your requirements for information from us and to notify you about any changes to our site or our services and products. Occasionally and only where appropriate and lawful to do so, we may also use your details for our own legitimate interests which may include administering and managing investment funds, direct marketing of our related services and products, to inform you of other features, services and products we can provide which we think you may be interested in and we may contact you by post, fax, email or telephone (subject to any contact preferences you have told us about in relation to our marketing communications). We will keep your personal information confidential except to the

extent that we are compelled to disclose it by law or to comply with an instruction of a regulatory body of competent jurisdiction.

Keeping your Personal Data confidential and secure

To comply with the requirements of the UK's General Data Protection Regulation, we adhere to strict security procedures and have taken all appropriate measures to ensure that no unauthorised disclosures of your details are made and that unauthorised access to your personal data is prevented.

How long we will keep your Personal Data

We will only retain your personal data for as long as it is necessary and lawful to do so. If you have given us your personal details for a specific and limited reason and have not agreed to receive future marketing information from us, we will only keep your data for as long as necessary to deal with your query.

If you have unsubscribed from our marketing database/informed us you do not wish to receive any marketing information we will need to retain your basic details to ensure we do not contact you with marketing information in future.

If you have made an investment enquiry and/or have a shareholding we may need to retain your personal data for longer periods to carry out our contractual and legal obligations.

We will always try to keep your personal data accurate and up to date. Please keep us informed of any changes to your personal data.

Electronic Marketing and Opting Out

You can ask us to stop sending you marketing messages at any time by contacting us at info@jkim.co.uk

Sharing of Personal Data and International Transfers

We may share your personal data with third-party service providers such as fund administrators, auditors, lawyers, consultants, and other professional advisors, regulators and law enforcement authorities, as required by law, and your authorized agents. Third party service providers are contractually obligated to maintain the confidentiality of the information we provide to them to use the information only to provide services to us.

Where we share your personal data with a third party we will always ensure, by means of a written contract with our appointed processors, that your personal data is kept safe and cannot be used for any purpose other than that for which the personal data was collected from / provided by you.

We do not currently transfer any of your personal data outside the EEA.

In the unlikely event of a transfer of your personal data out of the EEA, we would always ensure an equivalent degree of protection is afforded to your personal data by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission; or
- Where we use certain service providers located outside the EEA, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe; or

- Where we use providers based in the US, we may transfer data to them if they are part of the EU-US Privacy Shield (or a successor/replacement regime) which requires them to provide similar protection to personal data shared between the Europe and the US.

Your Legal Rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data such as the right to:

- Request access to your personal data.
- Request correction of your personal data
- Request erasure of your personal data
- Object to processing of your personal data
- Request restriction of processing your personal data
- Request transfer of your personal data
- Right to withdraw consent where we are relying on consent to process your personal data.

If you wish to exercise any of the rights set out above, you can inform us at any time, by contacting Mr Francis Kirkpatrick.

JK Investment Management LLP is a limited liability partnership registered in England & Wales with registration number OC304800 with its registered office at Bury House, Guildford, Surrey, GU2 4AW. JK Investment Management LLP is authorised and regulated by the Financial Conduct Authority under Firm Reference Number 225510.