

# **Dumas Capital Limited (“DCL”) General Data Protection Regulation Policy (“the Policy”)**

***This document also constitutes Dumas Capital Limited’s Privacy Notice***

## **General Statement of Duties and Scope**

Dumas Capital Limited is incorporated in Ireland. DCL is a specialist consulting company focused on alternative investments and capital markets. The company offers strategic advisory and research services to a select group of clients globally (“Clients”).

On behalf of a Client, DCL may also send specific research and/or analysis reports to individuals, working within an institution, who have given consent to receive the reports.

## **The Principles**

DCL will use all reasonable endeavours to comply with the following principles to ensure all data is:

- Fairly and lawfully processed
- Processed for a lawful purpose
- Accurate and current
- Adequate, relevant and not excessive
- Processed in accordance with the Data Subject's rights
- Secure
- Not kept for longer than necessary
- Not transferred to other countries without adequate protection.

## **Data Controller**

Nicola Grenham, Director of DCL is the Data Controller. Her contact details are as follows:

Email: [enquiries@dumascapital.com](mailto:enquiries@dumascapital.com)

## **Personal Data held by DCL**

A Data Subject is an individual who is the subject of personal data. Personal data covers both facts and opinions about an individual where that data identifies an individual.

DCL does not hold Sensitive Personal Data (as defined by the Regulations).

DCL holds the following personal data:

- Contact details of individuals working for clients and potential clients, individuals at service providers, peers, industry bodies and regulators.

## **Processing of Personal Data**

Personal data on Data Subjects is generally not processed by DCL. Permission to process data on Data Subjects will be obtained before any data is processed.

## **Rights of the Data Subjects**

Data subjects have the following rights:

- to withdraw consent to the processing of their data
- to access their data or to obtain a copy of it in a structured, commonly-used and in machine-readable format
- to request that the Data Controller send a copy of their personal data directly to another Data Controller

- to request the rectification or erasure of their data
- to object to the processing of their data
- to lodge a complaint with the Information Commissioner's Office ("ICO")

The Data Controller will provide information requested by the Data Subject without undue delay and in any event within 30 days of the receipt of the request.

### **Lawful reasons for processing Personal Data**

- Consent from the Data Subject
- Contract: the processing is necessary for a contract with the individual or because the individual has requested specific steps to be taken before entering into a contract
- Legal Obligation: the processing is necessary to comply with the law (not including contractual obligations)
- Public task: the processing is necessary to perform a task in the public interest or for official functions and the task or function has a clear basis in law
- Vital interests: the processing is necessary to protect someone's life
- Legitimate Interests: the processing is necessary for 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.

### **Data Retention**

Data on individuals working for Clients and potential Clients, individuals at service providers, peers, industry bodies and regulators will be retained while they remain associated/working with DCL.

### **Security**

The contact details consist of names, contact details and meeting notes. They are used for reference purposes and to send research and analysis reports to individuals working within institutions who have given consent to receive them.

Contact details are held on 3 computers and a mobile device. The computers and mobile device are password protected. These are used only by one executive director and one authorised administrative assistant. All devices are kept in a secure location. Access is restricted to one executive director and DCL's authorised administrative assistant.

DCL's email accounts, where contact information may also be stored, are password protected on all devices and securely backed up.

### **Breaches**

Should DCL become aware of any breach of this policy, the Data Controller will notify the ICO if the breach is likely to result in risk to rights and freedoms of individuals. This notification will be made without undue delay and, where feasible, within 72 hours of becoming aware of the breach.

### **Records**

DCL will review all personal data held at least once per annum.

DCL will keep records of such checking and consent.

All personal data which is to be deleted for any reason will be disposed of in a secure manner.

### **Transfer outside EU**

Should any personal data be transferred out of the EU, DCL will obtain assurance that the transferee will adhere to the same standards as set out in this Policy.