



Athla Capital Management

Privacy Notice

Privacy Notice

Athla Capital Management Limited, its subsidiaries and associated businesses (**Athla, we** and **The Company**) is committed to protecting your personal data and your privacy. We endeavour to ensure that any personal data we collect about you will be held and processed strictly in accordance with the Data Protection Act 1998 (**DPA**) and the European General Data Protection Regulation (**GDPR**). The terms Personal Data, Data Controller and processing have the meanings given to them in the GDPR (which can be accessed [here](#)), unless otherwise indicated.

At Athla we collect and process Personal Data in a number of ways. For instance:

- You are browsing our website, enquiring about our services; receiving our marketing communications, responding to one of our surveys or otherwise interacting with us as a prospective, current or former customer other than in connection with ongoing services we are providing to you or your organisation;
- You are a client of Athla;
- You are applying for or enquiring about a job at Athla
- You are an employee or contractor of Athla
- You are a supplier or service provider to Athla

Scope

This Privacy Policy demonstrates how Athla handles the Personal Data you provide to us, or which we collect about you, in the following ways (**Your Data**):

- by you submitting information to us through our website www.athlacapitalmanagement.com or when you subscribe to our newsletter and or blog (**Website User Data**);

- through your use of our other marketing resources, such as events or webinars which we run or sponsor (**Marketing Data**);
- from what we learn about you from your visit to our websites (**Website Background Data**); and/or
- by you otherwise interacting with us a prospective, current or former customer, (for example, where you provide your business card to us) other than in connection with ongoing services we are providing to you or your organisation (**Prospect Data**).

This statement does **not** apply to:

- The collection and processing of Personal Data in the course of providing investment or regulatory or other services to our clients. For information about privacy in the context of services provided to our clients, please contact the relevant Athla person responsible for your matter.
- The collection and processing of Personal Data about our employees or contractors. For information about privacy in the context of doing work for Athla please contact us.
- The collection and processing of Personal Data in relation to job candidates or applications for roles advertised on this website. For information about privacy in this context, please contact Athla.
- The collection and processing of Personal Data on our suppliers or service providers. For information about privacy in this context, please contact Athla.

Identity and Contact Details of Data Controller

For the purposes of the DPA and the GDPR, Athla is the controller of Your Data. If you have any queries regarding this policy or complaints about our

use of Your Data, please contact us at office@athlacapitalmanagement.com or at the address below and we will do our best to deal with your complaint or query as soon as possible.

Athla Capital Management Limited
51 Stoneable Road, Radstock BA3 3JR, UK
FAO: Data Processing

What we use Your Data for

The table below sets out the purposes for which we may process Your Data and the legal basis for the processing:

Data	Purpose	Legal Basis
Website User Data Marketing Data Prospect Data	To keep you informed of any activities undertaken by us which we believe may be of interest to you and this interest may include sending you email and postal marketing from time to time or requests to respond to a survey	Consent – this will be requested either when you submit Your Data to us or, if we have received Your Data indirectly, by way of an email sent in advance of us sending you any marketing communications
Website User Data Website Background Data	Website analytic purposes. For further details on the technology we use in order to analyse our website’s performance, please see our cookies policy for further information	Consent – this will be obtained when you click on the banner at the top of our website to accept certain cookies. Legitimate interest of Athla
Website User Data Marketing Data	To provide you with the newsletter(s) or information you have requested	Performance of a contract

Prospect Data		
Website User Data Marketing Data Prospect Data Website Background Data Survey Data	To respond to requests for information from regulated bodies or government agencies	Compliance with a legal obligation
Website User Data Prospect Data	To respond to an enquiry you have submitted	Legitimate interest of Athla – it may be necessary for us to process Your Data in order to reply or respond to your enquiry

Who we share Your Data with

Please note that we may on occasion be required to share your information with the following categories of recipients:

- We will be a data controller in respect of any such personal information about you. In certain circumstance we may need to share your personal information with our Principal Firm, Frank Investments Limited.
- Our Principal Firm will also be a data controller in respect of any such personal information about you and they will process such information in order to meet their requirements under the rules of the FCA.
- Third parties who provide services on our behalf. For example, we use third parties such as [MailChimp](#). A full list of all our third-party service providers is available on request.

We have taken steps to ensure that all such entities keep Your Data confidential and secure and only use it for the purposes that we have specified and have informed you of. Our service providers are subject to data processing agreements which are compliant with the requirements set out in the GDPR. Further details regarding any third parties who are located outside the EEA are set out below. In relation to any other third parties, we will only disclose your information in the following circumstances:

- Where you have given your consent.
- Where we are required to do so by law or enforceable request by a regulatory body.
- Where it is necessary for the purpose of, or in connection with legal proceedings or in order to exercise or defend legal rights.
- If we sell our company, go out of business, or merge with another company.

International Transfers

In certain circumstances, we may transfer Your Data to countries outside the EEA, which may not adhere to the same levels of data protection to which countries within the EEA are subject. Any such transfers are, at all times, made in accordance with the DPA and the GDPR. Details of the circumstances and mechanisms in place to ensure compliance are set out below:

Retention Period

Your Data will be stored for a maximum period of 6 years, after which time it will be destroyed if it is no longer required for the lawful purpose(s) for which it was obtained. If you consent to marketing, any information we use for this purpose will be kept with us until you notify us that you no longer wish to receive this information. unless we request your consent to store it for a longer period.

Your Rights in Relation to Your Data

Under the GDPR, you will have the following rights in relation to how we process Your Data:

- Right to request access – you may obtain confirmation from us as to whether or not Your Data is being processed and, where that is the case, access to Your Data.
- Right to rectification and erasure – you have the right to obtain rectification of inaccurate personal data we hold concerning you and to obtain the erasure of Your Data without undue delay in certain circumstances.
- Right to restriction of processing or to object to processing – you may require us to restrict the processing we carry out on Your Data in certain circumstances or to object to us processing Your Data.
- Right to data portability – you have the right to receive Your Data in a structured, commonly used and machine-readable format.
- Right to withdraw consent – where you have provided your consent to us processing Your Data, you have the right to withdraw your consent at any time. This can be done by emailing office@athlacapitalmanagement.com at any time or by clicking the “unsubscribe” link on any marketing communications you receive from us.
- Right to lodge a complaint – you may lodge a complaint with any supervisory authority in the EU. The supervisory authority for the United Kingdom is the Information Commissioner’s Office.

For further information on your rights, please see the Information Commissioner’s website [here](#).

Additional Information

- There is no statutory or contractual requirement for you to provide Your Data to us and you are not obliged to do so. Please note, however, that we may not be able to provide you with the services

you have requested, such as to receive our newsletter and or blog, if you do not provide your contact details. As set out in our cookies policy, our website may not be able to function fully if you do not agree to certain cookies being set on your computer.

- We do not undertake automated decision-making or profiling on Your Data.
- We keep our privacy policy under constant review and may change it from time to time to reflect our practices or to remain compliant with relevant legislation. We will notify you of any material changes to our privacy policy via a notification on our website. Your continued use of this website or our other marketing services, following the posting of changes to these terms, will mean you accept these changes

Security of Personal Information

We recognise the need to ensure that personal information gathered via this website remains secure. Our site has security measures in place to protect against the loss, misuse and alteration of the personal information under our control. Our security measures include the use of a hardware firewall to prevent unauthorised access. You acknowledge that although we exercise adequate care and security there remains a risk that information transmitted over the Internet and stored by computer may be intercepted or accessed by an unauthorised third party.

Data Obtained Indirectly

In some circumstances, we may obtain Personal Data about you from other sources. This information may include your name, contact details and job title, which we obtain from third party sources such as organisers of events we sponsor or other publicly available sources, such as your company's website.

Links

Our website contains links to other websites belonging to third parties. We do not control the privacy practices of these other websites. You should therefore make sure when you leave our website that you have read that website's privacy policy.

The Information Commissioners Officer is the supervisory authority in the UK for data protection. You may contact them should you have a complaint to make regarding the treatment of your personal data.

Website: <https://ico.org.uk/global/contact-us/>

Address: Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

Tel: 0303 123 1113