

Privacy Policy

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AHR Group (we, us or our) knows that you care how your information is used and shared, and we appreciate your trust in us to do that carefully and sensibly. Your privacy is important to us, and we are committed to protecting and respecting your privacy.

This Privacy Policy explains how we use your personal data. It has been drafted to address the requirements of the General Data Protection Regulation (EU) 2016/679 (“GDPR”) and the Data Protection Act 2018 (together with “Data Protection Laws”).

Personal data is information about you that we may collect directly from you, or it might be information that is provided to us about you by your investment, pension, insurance or other financial services providers, accountants, lawyers, the providers of any policies held by you or on your behalf, the trustees of any trust of which you are a beneficiary, or other sources (together referred to as “Providers”) at your direction.

Your personal data will be collected by us when you use our website, complete our opening paperwork to become a client, and during the provision of our services to you.

Your responsibilities

This Privacy Policy also applies to the personal data of your family members and/or other dependents. Where you, or others on your behalf, provide us with their personal information, you confirm that you are authorised to provide it. It is also your responsibility to draw this Privacy Policy to their attention.

It is also essential that the personal data we hold about you and your family members is accurate and current. Please keep us informed if any of this personal data changes during your relationship with us.

This Privacy Policy explains:

- Who we are
- Personal Data we may collect.
- Personal Data we obtain from third parties.
- Why we collect and use your personal data.
- Whom we share your personal data with.
- How long we will retain your personal data.
- Cookies and similar technologies.
- Marketing and research.
- Employment applications.
- How to access and control your personal data.
- Your right to withdraw consent.
- Your right to make a complaint.
- Changes to our Privacy Policy.

Who we are

We are AHR Group and the Controller of the personal data we hold about you, your family members and/or other dependents. Our business contact details are:

Registered office: 33, Edith Cavell Street, 11324, Port-Louis, Mauritius

Email: info@ahr-group.com

Website: www.ahr-group.com

Data Protection Officer contact details:

In writing: Lisa Melville: 33, Edith Cavell Street, 11324, Port-Louis, Mauritius

By email: Lisa.melville@ahr-group.com

Personal data we may collect

The specific types of personal data we may collect and use about you will depend on how much you use our website facilities or services.

The types of information we collect directly from you are:

- Personal and financial information will be collected when we meet you in person or by telephone and when you complete our new client documentation and engage our services. Information such as your contact details, date of birth, residency status, employment and tax status, national insurance number, passport/driving licence and utility bills. Sensitive Special Category data such as your race, ethnic origin, genetics, biometrics (where used for ID purposes), physical or mental health, sexual orientation, political and religious beliefs, or membership of groups such as trade unions. Your spouse's details (where relevant), including your spouse's: name; date of birth; nationality; occupation; or sensitive Special Category data as described above, and likewise, your children's and/or other dependants' details (where relevant) including their: name; date of birth; nationality; occupation; or sensitive Special Category data as described above.
- Important information that helps us assess our services' suitability for your needs, such as details relating to your assets and liabilities and your financial goals and time horizon. In large part, this is information provided by you in our Fact Find document. In addition, we also process your answers to our Attitude to Investment Risk Questionnaire to help us understand your attitude toward taking financial risks. This allows us to understand your needs and financial goals and builds a profile that assists us in tailoring our services to your needs. This occurs at the beginning of the relationship and periodically whilst you remain a client.
- Information on the source of your wealth and the source of the funds you have to be able to receive our services and for regulatory reasons.
- We will collect information that helps us to contact you, such as your name, email address and telephone number when you enquire or request information on our services through our website. We will retain data regarding the services for which you request information.
- We will record your telephone conversations for monitoring and quality purposes. The Financial Conduct Authority (FCA) requires us to retain phone conversation data for five years. After this time, the data is destroyed. We don't use the recorded data for marketing purposes or share it with any third parties.
- When you use our website, we will capture the information provided when registering to use our site, subscribing to our service, posting material or requesting further information on our services. You may email Lisa.melville@ahr-group.com requesting additional information on our services. Additionally, you may request further information within our secure client area if you are an existing client.

- We may also ask you for information regarding your user experience, such as details on your browsing history when you report a problem using our website.
- If you contact us using any of the above methods, we may keep a record of that correspondence.

The types of information we collect from you automatically are:

- Details of your visits to our website including, but not limited to, traffic data, location data and other communication data, whether this is required for our billing purposes or otherwise and the resources that you access.
- For more information on the data collected by these means, please refer to our section on cookies below.

Aggregate/ Anonymous Data

We may aggregate and/or anonymise any personal data collected through the facilities, services or products offered so that such information can no longer be linked to you or your device. We may use this information for any purpose and may share this data with third parties.

Personal data we obtain from third parties

We obtain information about you from third parties when we carry out Anti Money Laundering 'AML' Checks using credit and fraud prevention agencies. This will leave a 'soft footprint' on your credit history.

The data we obtain from the credit reference agency is collated by searching the records of multiple sources and is used to help us to assess the strength of the information you have supplied before we can accept you as a client. This includes identity and residential address verification, credit checks, sanctions checks, and politically exposed person checks. Criminal record checks, sanction checks, and politically exposed person checks. These checks are carried out on any individual or entity associated with an account investing monies/funds or instructing on these accounts. DBS checks are also carried out to ensure the people we hire do not have a criminal record to protect our clients and the business from potential illegal activity.

Why we collect and use your personal data

We, or our data processors and other controllers to whom we provide your personal data, use your information for various purposes depending on the types of information we have collected from and about you and the specific facilities, services or products you use. In particular, we collect and process your information for the following purposes:

- To enter into contracts with you and carry out our obligations arising from any contracts entered into between you and us.
- To allow you to participate in interactive features of our service when you choose to do so.
- To notify you about changes to our service.
- To provide you with information, products or services that you request from us or that we feel may interest you. In this latter case, we will only provide it where you have consented to be contacted for such purposes.

Our legal bases for processing your data

We only process personal data where we have a legal basis for doing so. Please note that we may process your personal data for more than one legal ground, depending on the specific purpose for using your data.

The legal bases for processing your personal data is that the processing:

- Is necessary for the performance of a contract with you (including providing you with access to our Premium Content subscription service) or to take steps at your request prior to entering into a contract (for example, providing the services and products you have engaged us to provide, providing you with website facilities, and providing initial information requested by you relating to our services and products)
- Is necessary for compliance with a legal obligation to which we are subject (for example, complying with anti-money-laundering rules and our reporting requirements to the Financial Services Commission FSC)
- It is necessary for our legitimate interests or those of third parties, provided these are not overridden by your rights and interests (for example, where we collect your information automatically or you respond to a survey. Our legitimate interests are to provide security for our website, operate our business and provide our services in the best way for our clients and ourselves)
- Where we request your consent (for example, to provide marketing materials to you).

Whenever we process special categories of personal data (racial or ethnic origin, religious or political beliefs, physical or mental health, biometric data where used for ID purposes, or sexual orientation), our legal basis for processing will be your explicit consent (or that of your relevant family member/dependant), or that it is necessary for:

- Reasons of substantial public interest, such as the prevention or detection of fraud, crime or other unlawful acts, or the data being necessary for an insurance purpose and in accordance with appropriate safeguards; or
- The establishment, exercise or defence of legal claims.

Any processing relating to criminal convictions and offences or related security measures are for the substantial public interest of preventing fraud, crime or other unlawful acts and in accordance with appropriate safeguards.

Whenever we consider relying on legitimate interests, we consider and balance any potential impact on you (both positive and negative) and your rights. We do not process personal data where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted by law).

If you fail to provide personal data

Where we need to collect personal data by law or under the terms of a contract we have with you, and you fail to provide that information when requested, we may not be able to contract with you or perform our contract with you (for example, to provide you with our products and services). In this case, we may have to terminate a contract with you, but we will notify you at the time if this is the case.

How long will we retain your personal data for

We will only keep your personal data for as long as we need to fulfil the purposes for which it was collected, as set out in this Privacy Policy, and for as long as we are required to keep it by law. To ensure we meet our obligations, we have a designated data retention policy that relates to but is not limited to, all physical documents, electronic versions of documents, digital voice recordings and data held in systems relating to AHR Group's clients and indicates when personal information should be disposed of.

For more information, contact our Data Protection Officer, Lisa Melville, as noted on Page 2 of this Privacy Policy. AHR Group securely disposes personal data when it is no longer needed.

Cookies and similar technologies

When we collect information automatically, as stated above, our service providers and we use internet server logs, cookies, tags, Software Development Kit, tracking pixels and other similar tracking technologies. We use these technologies to offer you a more tailored experience in the future by understanding and remembering your particular browsing preferences. We may also gather information through other methods as we adopt other technologies.

We also use cookies to measure the effectiveness of our marketing communications.

For more information on the cookies we use, the purposes for which we use them and how you can control them, please refer to our Cookies Policy on our website.

Marketing and research

You have choices when it comes to receiving marketing communications from us and taking part in market research. We will send you relevant news about our products and services in several ways, including by email, but only if you have previously agreed to receive these marketing communications.

Additionally, you can unsubscribe anytime using the unsubscribe button on our emails or by contacting us at info@ahr-group.com.

We would also like to hear your views to help us improve our services and products so we may contact you for market research. But, of course, you always have the choice about whether to participate in any of our surveys or market research.

Automated Decision Making

We do not undertake any fully automated decision-making (i.e., without human intervention) in relation to you.

How to access and control your personal data

You have certain rights with respect to your information which are summarised below. Some of the rights are complex. Therefore, not all details are included in the summary:

- Right to be informed: you can print a copy of this Privacy Policy or request a printed version from your Financial Planning Team.
- Right of access: you can ask for copies of information that we process about you;
- Right to rectification: you can ask to have any inaccurate information we hold about you corrected;
- Right to erasure: you can ask for the information held about you to be erased (subject to specific criteria);
- Right to restriction of processing: you can ask us to restrict the processing of your information (under certain circumstances);
- Right to data portability: you can, under certain circumstances, request that we transmit your personal information that you have provided to us to you or another provider of services.

Your right to object

You can object to your information being processed if our legal basis for processing your information is based on “legitimate interests”. To check whether we use your information for “legitimate interests”, see the section “Why we collect and use your personal data” above.

If you would like to exercise any of your rights mentioned above or to obtain more information about those rights, you can do so by writing or emailing our Data Protection Officer detailed above.

Your right to withdraw consent

Where you have provided consent for us to process your information, you can withdraw your consent at any time.

Please note: withdrawal will not affect the lawfulness of the processing before you withdraw your consent. In some circumstances, withdrawing your consent may mean we cannot provide you with some or all of our services.

You can withdraw your consent to our use of your data by contacting our Data Protection Officer detailed above.

You can withdraw your consent to receive our marketing emails by using the unsubscribe button on our marketing emails or by notifying us by email: info@ahr-group.com

Your right to make a complaint

If you have a complaint about the way we process your personal data or think that we have not complied with your data privacy rights, this is also something we’d like to resolve with you directly.

Please contact in the first instance our Data Protection Officer:

Name: Lisa Melville

By email: Lisa.melville@ahr-group.com

You will be informed of changes to this policy by notification on our website.

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