



Privacy Notice

Mudita Advisors LLP (“Mudita Advisors”), which also trades as Mudita Management (“Mudita Management” and, together with Mudita Advisors, the “Firm”) is a limited liability partnership incorporated in England & Wales with company number OC428184. Mudita Advisors is authorized and regulated in the UK, by the Financial Conduct Authority (“FCA”) with firm reference number 939360. Mudita Advisors’ registered office is 4th floor, Phoenix House, Station Hill, Reading, RG1 1NB, United Kingdom.

For the purposes of the General Data Protection Regulation (“GDPR”), Mudita Advisors will be the ‘controller’ of the personal data you provide. Please read the following information carefully in order to understand the Firm’s practices in relation to the treatment of your personal data. Should you have any questions please contact us at compliance@muditamanagement.com

What data privacy principles does the Firm adhere to?

The Firm adheres to the following principles in the treatment of personal data:

- The Firm will process all personal data in a lawful, fair and transparent manner.
- The Firm will only collect personal data where it is necessary:
 - For the Firm to provide a service to you;
 - For you to provide a service to the Firm;
 - For the Firm to keep you informed of its products and services; or
 - For the Firm to comply with its legal and regulatory obligations
- The personal data collected by the Firm will be adequate, relevant and limited to what is necessary in relation to the specific purpose for which your data will be processed.
- The Firm will take all reasonable steps to ensure that personal data is accurate and, where necessary, kept up-to-date.
- The Firm will maintain all personal data in a form that permits identification no longer than is necessary for the purposes for which personal data has been collected for processing, in accordance with the Firm’s record retention requirements as required by the FCA.
- The Firm will hold and process personal data in a manner that ensures appropriate security.
- The Firm will only share personal data where it is necessary to provide the agreed service or where it is necessary for the Firm to comply with its legal and regulatory obligations.
- The Firm only utilize a service provider based outside the UK for the processing of personal data where it is necessary to facilitate our services to you. We will ensure service providers are compliant with GDPR ahead of transferring any personal data.

What personal data does the Firm collect and why?

In the course of providing products and services to you, the Firm may collect information that is considered personal information (for example name, contact details, address, passport number, driving licence).

As a client, contact or employee of the Firm, we will require some information in order to verify your identity and have the application relationship with you. Some of this information may be required to satisfy legal obligations (for example to comply with obligations arising under anti-money laundering regulations). The information collected will vary depending on the service the firm provides to you, or you provide to the Firm, but typically includes:

- Personal information: for example, your name, date of birth, passport number or National Insurance number.
- Contact information: for example, your address, telephone number and email address.

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Where does the Firm store my personal data?

The Firm has comprehensive policies and procedures in place to ensure your personal data is kept secure. These include:

- Data encryption.
- Firewalls.
- Intrusion detection.
- 24/7 physical protection of the facilities where your data is stored (eg. Google's data centers).
- Background checks for personally that access physical facilities.
- Security procedures across all service operations.

How long does the Firm retain personal data?

As a regulated entity, the Firm is required to maintain its books and records for a prescribed period (five years from either the ceasing of a business relationship; or, in the case of non-clients, from the making of a record; or alternatively for seven years where specifically requested to do so by the FCA. As such, information that falls in scope of either of these requirements is retained in line with the mandated timeframe.

Any information that is outside the scope of this requirement will be retained while relevant and useful and destroyed when this ceases to be the case or where the data subject specifically requires this.

How have I been categorized in accordance with GDPR?

The GDPR requires the Firm to inform you of the legal basis on which we maintain your personal data. Typically the firm will personally confirm this with you. However, as a general rule, the following is applicable:

- Clients – Information is maintained on the basis on contractual obligation and/ or legitimate interests (where relevant).
- Service Providers – Information is maintained on the basis on contractual obligation.
- Database/ marketing contacts – Information is maintained on the basis of legitimate interest.

What are my rights?

Once you have provided your details to the Firm, you have certain rights which apply depending on your relationship with the Firm, the information you have shared with us and the Firm's legal and regulatory obligations.

- You have the right to request a copy of the information that we hold about you. If you would like a copy of some, or all, of your personal information, please email the Firm at compliance@muditamanagement.com. The Firm will provide this information to you within one month (with the ability to extend this by an additional two months where necessary for practical reasons), free of charge.
- You have the right to request that the information the Firm holds about you is erased under certain circumstances, such as where there is no additional legal and/ regulatory requirement for the Firm to retain this information.
- As a client, you have the right to request that any information the Firm holds about you be provided to another company in a commonly used machine-readable format, otherwise known as 'data portability'.
- You have the right to ensure that your personal information is accurate, up-to-date or, where necessary, rectified. Where you feel that your personal data is incorrect or inaccurate and should therefore be updated, please contact compliance@muditamanagement.com.
- You have the right to object to your information being processed for certain purposes, for example for direct marketing purposes.
- You have the right to restrict the processing of your information, for example limiting the material that you receive or where your information is transferred.
- You have the right to object to any decisions based on the automated processing of your personal data, including profiling.

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- You have the right to lodge a complaint with the Information Commissioner's Office if you feel that we have not processed your data in accordance with GDPR, with any contractual arrangements, or with this Privacy Notice

Will I be notified of changes to this policy?

The Firm may, from time to time, review and update this policy. The Firm will maintain the latest version of this policy on the Firm's systems and it is available from the Firm on request. Where the changes are deemed material, it will make you aware of these.

To whom should I direct questions?

If you have any questions, concerns or complaints about the practices contained in this document, or how the Firm has handled your data, please email compliance@muditamanagement.com. Alternatively, please write to the address below.

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