

## Privacy notice

Last updated: 17<sup>th</sup> July 2020

Pillar 4 Consultants Ltd ("Pillar 4" "us") takes data privacy seriously. Pillar 4 recognise and value the trust that individuals place in Pillar 4 when providing us with personal data and we are committed to safeguarding the privacy and security of personal data we may collect from visitors to our websites and/or the clients to whom we provide services.

**This Privacy notice aims to help you understand our personal data collection, usage and disclosure practices by explaining:**

1. Who we are and what we do
2. What personal data we collect about you
3. How we obtain the personal data about you
4. How we use your personal data
5. Who we share your personal data with
6. Which countries we transfer your personal data to
7. How long we keep your personal data
8. How we protect your personal data
9. What rights you have in relation to your personal data
10. Who is the data controller for your personal data
11. How we use cookies and similar technologies
12. How you can contact us
13. How we will update this Privacy notice

By providing your personal data to Pillar 4, whether via one of our websites, by email, in person or over the phone, you agree to the processing set out in this Privacy notice. Further notices highlighting certain uses we wish to make of your personal data together with the ability to opt in or out of selected uses may also be provided to you when Pillar 4 collects personal data from you.

This Privacy notice aims to help you understand our personal data collection, usage and disclosure practices by explaining:

### **1. Who we are and what we do**

Pillar 4 Consultants Ltd ("Pillar 4") provides FCA and PRA support primarily to investment firms either seeking authorisation in the UK or seeking bespoke advice on regulatory and compliance matters. A list of our services is available through our website (<https://www.pillar4consultants.co.uk/>)

### **2. What personal data we collect about you**

We may collect and process different types of personal data in the course of operating our business and providing our services. These include:

- Basic personal details such as your name and job title;
- Contact data such as your telephone number and postal or email address;
- Financial data such as payment related information or bank account details;
- Demographic data such as your address, preferences or interests;
- Website usage and other technical data such as details of your visits to our websites or information collected through cookies and other analytical technologies.

- Personal data provided to us by or on behalf of our clients or generated by us in the course of providing our services.
- Identification and other background verification data such as a copy of passports or utility bills or evidence of beneficial ownership or the source of funds to comply with client due diligence/"know your client"/anti-money laundering laws and collected as part of our client acceptance and ongoing monitoring procedures.
- Recruitment related data such as your curriculum vitae, your education and employment history, details of professional memberships and other information relevant to potential recruitment to Pillar 4.
- Any other personal data relating to you that you may provide.

### **3. How we obtain the personal data about you**

We may collect or receive your personal data in a number of different ways:

- Where you provide it to us directly, for example by corresponding with us by email, or via other direct interactions with us such as completing a form on our website
- Where we monitor use of, or interactions with, our websites;
- Publicly available sources - we may, for example, use sources such as LinkedIn to help us keep the contact details we already hold for you accurate and up to date

### **4. How we use your personal data**

We will only use your personal data where we are permitted to do so by applicable law. Under EU data protection law, the use of personal data must be justified under one of a number of legal grounds. The principal legal grounds that justify our use of your personal data are:

- Contract performance: where your information is necessary to enter into or perform our contract with you
- Legal obligation: where we need to use your information to comply with our legal obligations
- Legitimate interests: where we use your information to achieve a legitimate interest and our reasons for using it outweigh any prejudice to your data protection rights
- Legal claims: where your information is necessary for us to defend, prosecute or make a claim against you, us or a third party
- Consent: where you have consented to our use of your information

We may use your personal data in the following ways. In each case, we note the grounds that we rely on to use your personal data.

- To provide services to you— to administer and carry out our obligations arising from any agreements entered into between you and us (legal grounds: contract performance, legitimate, consent);
- To facilitate use of our website— to respond to requests for information or enquiries from visitors to our websites and to ensure that content from our websites is presented in the most effective manner for you and for your device (legal grounds: legitimate interests, consent, contract performance);
- For marketing and business development purposes—to provide you with details of our new services and regulatory updates (legal grounds: legitimate interests, consent).

## **5. Who we share your personal data with**

At the time of writing this privacy notice, Pillar 4 Consultants Ltd only operates out of the UK. If we are to set up overseas entities we may share personal data that we collect or you provide to us among

our global entities. Disclosure of such information sharing within our global entities will be disclosed to you.

We may also share your personal data with a variety of the following third parties:

- Our professional advisors (advisors and consultants we may refer to for expert regulatory and compliance advice);
- Other third-party external advisors or experts engaged in the course of the services we provide to our clients such as lawyers, technology service providers, Accountants;
- Third party affiliate firms where it is deemed that a potential client can benefit from their services.

## **6. Which countries we transfer your personal data to**

Regardless of the location of our processing, we will impose the same data protection safeguards that we deploy inside the EEA and implement appropriate measures to ensure that your personal data is protected in accordance with applicable data protection laws.

## **7. How long we keep your personal data**

We will retain your personal data for as long as is necessary to fulfil the purpose for which this data was collected and any other permitted linked purpose (for example certain transaction details and correspondence related to any regulatory and compliance services we provide may be retained until the time limit for claims in respect of the transaction has expired or in order to comply with regulatory requirements regarding the retention of such data).

## **8. How we protect your personal data**

While no data transmission can be guaranteed to be secure from intrusion, we implement a range of commercially reasonable physical, technical and procedural measures to help protect personal data from unauthorised access, use, disclosure, alteration or destruction in accordance with data protection law requirements.

## **9. What rights you have in relation to your personal data**

If you have any questions about our use of your personal data, you should first contact us via the details provided in section 12 below. Under certain circumstances and in accordance with EU or other applicable data protection laws, you may have the right to require us to:

- provide you with further details on the use we make of your information
- provide you with a copy of information that we hold about you.
- update any inaccuracies in the personal data we hold,
- delete any personal data that we no longer have a lawful ground to use.
- where processing is based on consent, to withdraw your consent so that we stop that particular processing.
- object to any processing based on the legitimate interests ground unless our reasons for undertaking that processing outweigh any prejudice to your data protection rights; and

- restrict how we use your information whilst a complaint is being investigated.

## **10. Who is the data controller of your personal data**

Pillar 4 Consultants Ltd will be the data controller of your personal data.

## **11. How we use cookies and website analytics**

When you visit our website, we may send a cookie to your computer. This is a data file stored by your computer to help improve functionality or tailor information to provide visitors with more relevant pages. We may also analyse website traffic to identify what visitors find most interesting so we can tailor our websites. Pillar 4 does not use cookies to deliver targeted advertisements to you when you access the website.

## **12. How you can contact us**

If you have any questions about our Privacy notice, please contact us by sending an email to our data protection officer: [prash@pillar4consultants.co.uk](mailto:prash@pillar4consultants.co.uk) or by writing to:

ATTN: Data Protection Officer  
Pillar 4 Consultants Ltd  
1 Royal Exchange Avenue,  
London,  
England,  
United Kingdom,  
EC3V 3LT

## **14. How we may update this Privacy notice**

We may change our Privacy notice from time to time in the future. We therefore encourage you to review them when you visit the website