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Global Investment Strategy UK Ltd

GDPR Data Protection Policy

2026

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Contents

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General Data Protection Regulation (GDPR)

The EU General Data Protection Regulation (GDPR) replaces the Data Protection Directive 95/46/EC and was designed to harmonize data privacy laws across Europe, to protect and empower all EU citizens' data privacy and to reshape the way organizations across the region approach data privacy.

In line with Article 5 of the GDPR, GIS must always conform to the following principles.

1. Lawfulness, fairness and transparency	Personal data shall be processed lawfully, fairly and in a transparent manner in relation to the data subject.
2. Purpose limitation	Personal data shall be collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes.
3. Data minimisation	Personal data shall be adequate, relevant and limited to what is necessary in relation to the purposes for which it is processed.
4. Accuracy	Personal data shall be accurate and, where necessary, kept up to date.
5. Storage limitation	Personal data shall be kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data is processed.
6. Integrity and confidentiality	Personal data shall be processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.
7. Accountability	The controller shall be responsible for and be able to demonstrate compliance with the GDPR.

GIS is always responsible for, and able to demonstrate compliance with the principles.

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1. Compliance monitoring

In order to maintain a high level of compliance in relation to the rules stipulated within this policy, GIS carries out an annual Data Protection compliance audit. Conducting a through diagnostic audit allows GIS to recognise any deficiencies or areas for improvement; upon mitigation, ensuring total compliance to the GDPR. Examples of the areas covered within an audit include:

(a) data protection governance, and the structures, policies and procedures to ensure GDPR compliance.
(b) the processes for managing both electronic and manual records containing personal data.
(c) the processes responding to any request for personal data.
(d) the technical and organisational measures in place to ensure that there is adequate security over personal data.
the provision and monitoring of staff data protection training and the awareness of data protection; and

(e) data audit as per Appendix 2.

2. Data subject rights and requests

The GDPR provides the following rights for individuals:

1. the right to be informed.
2. the right of access.
3. the right to rectification.
4. the right to erasure.
5. the right to restrict processing.
6. the right to data portability.
7. the right to object; and
8. rights in relation to automated decision making and profiling.

GIS have in place adequate systems and controls to enable and facilitate the application of the eight data subject rights listed above. When a data subject makes a request GIS will embark on a pragmatic decision-making process headed up by John Gunn.

Unless GIS deem requests to be excessive or unnecessary in their nature, no fee will be charged to the data subjects for considering and/or complying with requests.

3. Rights to access

All requests of this nature should be referred to the compliance department. GIS will respond to requests within 30 days of receiving them.

The data subject has the right to obtain the following information from GIS:

(a) the purposes of the processing.
(b) the categories of personal data concerned.
(c) the recipients or categories personal data stored for the data subject.

(d) the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period; and
(e) the use of any automated decision-making (e.g. profiling).

When requested, GIS shall provide a copy of the personal data held. For any further copies requested by the data subject, GIS may charge a reasonable fee based on administrative costs. Where requests are made via electronic means, GIS shall provide the data in a commonly used electronic form.

4. Right to rectification

GIS will ensure all data subjects are able to exercise their right to obtain from the firm without undue delay the rectification of inaccurate personal data concerning him or her.

5. Right to erasure

Without undue delay GIS will erase personal data of a data subject where requested, and where one of the following grounds applies:

(a) the personal data is no longer necessary in relation to the purposes for which it was collected or otherwise processed.
(b) the data subject withdraws consent which the processing is based on, and where there is no other legal ground for the processing.
(c) the data subject objects to the processing and there are no overriding legitimate grounds for the processing, or where the data subject objects to processing.
(d) the personal data has been unlawfully processed.
(e) the personal data must be erased compliant with a legal obligation in the member state law; and
(f) the personal data have been collected in relation to the offer of information society services.

Article 17 3 (b) GDPR, states that the right to erasure is disapplied where the firm must retain data in order to comply with other applicable regulation. The superseding regulations in GIS's case are, The Money Laundering Regulations requirement for firms to hold KYC data for 5 years, and MiFID II Article 16 requirements on record keeping. This is referred to in GIS's privacy notice.

6. Right to restrict processing

GIS will cease processing of personal data in the following circumstances:

(a) where an individual contests the accuracy of the personal data, GIS will restrict the processing until the accuracy of the data is verified.
(b) where an individual has objected to the processing and the firm are considering whether we have legitimate grounds to override those of the individual.
(c) when processing is found to be unlawful and the individual opposes erasure and requests a restriction instead; and
(d) if we no longer need the data but the individual requires the data to establish, exercise of defend a legal claim.

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7. Right to data portability

The right to portability only applies:

(a) to personal data an individual has provided to a controller.
(b) where the processing is based on the individual's consent or for the performance of a contract; and
(c) when processing is carried out by automated means.

To comply, GIS must:

(a) provide the personal data in a structured, commonly used and machine-readable format.
(b) provide the data free of charge (unless request is excessive or unnecessary);
(c) if requested and technically feasible, transmit the data directly to another organisation; and
(d) consider possible prejudice of the rights of individuals, where the personal data concerns more than one individual.

8. Consent

Consent must be given by a clear affirmative act, which establishes freely given, specific, informed and unambiguous indication of the data subject's agreement to the processing of their data. GIS will obtain consent via a written statement, by electronic means, or an oral statement.

GIS request manage and record consent pursuant to Articles 5, 6, 7 and 9 of GDPR.

(a) GIS check that consent is the most appropriate lawful basis for processing.
(b) GIS make the request for consent prominent and separate from our terms and conditions.
(c) GIS request a positive opt in.
(d) GIS do not use pre-ticked boxes or any other type of default consent.
(e) GIS use clear, plain language that is easy to understand.
(f) GIS specify why we want the data and its purpose.
(g) GIS provide granular options to consent separately to different purposes and types of processing.
(h) GIS name our organisation and any third-party controllers who will be relying on our consent.
(i) GIS ensure that individuals can refuse to consent without detriment and will avoid making consent a precondition of service.

GIS record when and how the firm obtained consent from individuals. GIS will also keep a record of the exact information originally provided.

Exercises which GIS may carry out to ensure the appropriate management of consent include the following.

(a) GIS to regularly review consents to check that the relationship, the processing and the purposes have not changed.
(b) GIS to have processes in place to refresh consent at appropriate intervals, including any parental consents.
(c) GIS to consider using privacy dashboards or other preference-management tools as a matter of good practice.
(d) GIS make it easy for individuals to withdraw their consent at any time and publicise how this is done.
(e) GIS act on withdrawals of consent as soon as possible; and

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(f) GIS will not penalise individuals who wish to withdraw consent.

GIS will not infer consent from silence or inactivity. When the processing of personal data has multiple purposes, GIS will obtain consent for all of them. Where a data subject's consent is to be given following a request by electronic means, GIS will ensure the request is clear, concise and not unnecessarily disruptive to the use of the service for which it is provided.

9. Data privacy by design

GIS have in place technical and organisational measures which integrate data protection into processing activities. Privacy and data protection are a key consideration in the early stages of any project GIS undertakes, for example when:

(a) building new IT systems for storing or accessing personal data.
(b) developing legislation, policy or strategies that have privacy implications.
(c) embarking on a data sharing initiative; or
(d) using data for new purposes.

Privacy and data protection considerations will be integrated into GIS's risk management methodologies and policies.

10. Data protection impact assessments (DPIA)

GIS will carry out a DPIA where data processing is likely to result in high risk to individuals, for example:

(a) where a new technology is being implemented.
(b) where a profiling operation is likely to significantly affect individuals; or
(c) where there is large scale processing of special categories of data.

In assessing the level of risk GIS will consider both the likelihood and severity of any impact to individuals concerned.

GIS ensure that there is a sound understanding of DPIA amongst certain members of the firm by:

(a) providing training so that all staff understand the need to consider a DPIA at the early stages of any plan involving personal data.
(b) existing policies, processes and procedures include references to DPIA requirements, where applicable.
(c) understanding the types of processing that requires a DPIA.
(d) creating and documenting a robust DPIA process; and
(e) will provide training for relevant staff on how to carry out a DPIA.

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11.Breach Reporting

In the case of a personal data breach, GIS shall without undue delay, and where practicable, notify the ICO not later than 72 hours after having become aware of the breach. This is not required, where the breach will not likely result in a risk to the rights and freedoms of natural persons. Where the notification is not made with 72 hours GIS must provide a valid reason for the delay. ICO contact details can be found in Appendix 1.

Notifications made by GIS shall at least:

(a) describe the nature of the personal data breach.
(b) communicate the name and contact details of the relevant department handling the data breach.
(c) describe the likely consequences of the personal data breach; and
(d) describe the measure taken or proposed to be taken by GIS to address the personal data breach, including, where appropriate, measures to mitigate its possible adverse effects.

Where the personal data breach is likely to result in a high risk to the rights and freedoms of subjects, GIS shall communicate the data breach to the data subject without undue delay.

GIS shall communicate the matter to the data subject in clear and plain language the nature of the personal data breach, detailing at least the information in points (b), (c) and (d) above.

12.Record keeping

GIS employ fewer than 250 people, therefore, Article 30 GDPR is technically not applicable. Due to the other data monitoring requirements dictated by GDPR and for best practice, GIS will maintain a record of processing activities under its responsibility. That record shall contain the following information:

(a) the name and contact details of the controller;
(b) the purposes of the processing;
(c) a description of the categories of data subjects and of the categories of personal data;
(d) the recipients to whom the personal data has been or will be disclosed including recipients in third counties or international organisations;
(e) where applicable, transfers of personal data to a third country or international organisation, including the identification of that third country or international organisation;
(f) where possible, the envisaged time limits for erasure of the different categories of data; and
(g) where possible, a description of the technical and organisation measures referred to in Article 32(1).

GIS keeps records in writing, and in electronic format.

If requested by the FCA/ICO, GIS will make records available immediately.

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13.Complaints handling

Upon receipt of a data subject complaint GIS will internally investigate the issue and will inform the data subject of progress and eventually the outcome of the complaint. This must be communicated within a reasonable time period.

Where the issue cannot be resolved between the data subject and GIS, they may choose to seek redress through mediation, litigation procedure or via complaint to the ICO. GIS must inform data subjects of their right to complain directly to the ICO.

Appendices

APPENDIX 1

Personal data	Any information (including opinions and intentions) which relates to an identified or identifiable natural person.
Data controller	A natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data.
Data subject	The identified or identifiable natural person to which the data refers.
Consent	Any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her.
International organisation	An organisation and its subordinate bodies governed by public international law, or any other body which is set up by, or on the basis of, an agreement between two or more countries.
ICO	Data protection supervisory authority: Information Commissioner's Office Telephone: 03031-231-113 Opening hours: Monday to Friday 9am- 5pm

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APPENDIX 2

Monitoring Data checklist

Details of the data held by GIS	
Reason for holding that data	
Methods for obtaining that data	
Date that the data was obtained	
Individuals responsible for the data	
Data storage	
Data retention	
Data deletion methodology	