TAMAC
Thomé ASSET MANAGEMENT & ASSET CONTROL

Privacy Policy

Information about us

TAMAC is an asset management firm and a family office. We provide discretionary fund management services and a range of investment solutions and comprehensive wealth management services for private clients. TAMAC is a trading name of Thomé Asset Management & Asset Controlling which is authorised and regulated by the Financial Conduct Authority (Firm Reference Number 416226).

TAMAC is committed to protecting and respecting your privacy. This privacy policy sets out how we collect, store and use your personal data when you provide it to us. It provides you with details about the types of personal data that we collect from you, how we use your personal data and the rights you have to control our use of your personal data.

What information do we collect about you?

In order for us to provide the most appropriate wealth management solutions, we may collect some or all of the following personal data (this may vary according to your relationship with us):

- basic personal details including your name and address (and proof of name and address), email address, telephone number, any other contact details you supply;
- nationality, citizenship, tax residency;
- date of birth and family connections;
- banking details;
- information on your assets and/or income and/or financial dealings, and details of your investments;
- details of your company's directors, shareholders, secretaries, authorised signatories and identification documents;
- data received from due diligence activities (such as anti-money laundering, politically exposed persons and sanctions checks);
- records of all communications including recordings of phone calls and electronic communications with our staff and meeting notes.

Please note that we are required to record telephone conversations, which we will do without a warning, and to keep copies of electronic communications. We are required to keep copies of these recordings for at least 6 months and of electronic communications for a period of at least five years after the end of our client relationship.

How will we use the information about you?

Under UK GDPR, we must always have a lawful basis for using personal data. This may be because the data is necessary for our performance of a contract with you, because you have consented to our use of your personal data, or because it is in our legitimate business interests to use it. Your personal data will be used for one of the following purposes:

- to provide investment and wealth management services to you. We use the information about you to manage your portfolio according to your risk profile, preferences, financial situation etc.;
- to conduct 'know-your-client' (KYC) checks and other procedures that we undertake prior to you becoming a client of ours, and in the course of our ongoing business relationship. This allows us to comply with our regulatory and legal obligations.
- to contact you to discuss matters relating to your portfolio;
- to provide you with reports that fulfil our regulatory requirements;
- to personalise and tailor our services for you;
- to communicate with you. This may include responding to emails or calls from you.
- For our internal business administration and record keeping purposes;
- To supply you with information by email that you have opted-in to (you may unsubscribe or opt-out at any time by emailing unsubscibe@tamac.com).

Who will have access to your information?

TAMAC will not share any of your personal data information for marketing purposes with companies outside of TAMAC.

In order to deliver our services to you effectively we may send your details to third parties such as those that we engage for professional services, as well as product and platform providers that we use to arrange financial products for you.

Where third parties are involved in processing your data, we'll have a contract in place with them to ensure that the nature and purpose of the processing is clear, that they are subject to a duty of confidence in processing your data and that they'll only act in accordance with written instructions.

If any of your personal data is required by a third party, as described above, we will take steps to ensure that your personal data is handled safely, securely, and in accordance with your rights, our obligations, and the third party's obligations under the law.

How long will we store your information?

Our policy is to keep your information for five years from the end date of your client agreement though this can be extended to seven years on request by our regulator.

You have the right to request deletion of your personal data. We'll comply with this request, subject to the restrictions of our regulatory obligations and legitimate interests as noted above.

Your rights

Under data protection law, you have rights in respect of the personal data relating to you. You have the right:

- to be informed about the processing of your personal data (this is what this statement sets out to do);
- to have your personal data corrected if it is inaccurate and to have incomplete information completed;
- to object to processing of your personal data;

- to restrict processing of your personal data in certain circumstances including where you contest the accuracy of it, you have objected to it and we are assessing whether we can stop processing it and still comply with our contractual and legal obligations;
- to have your personal data erased in certain circumstances including where it is no longer necessary for our purposes, you withdraw your consent or you object to the processing and we have no overriding contractual or legal reasons to continue using it;
- to withdraw your consent to our processing of your personal data where we have relied on your consent;
- to request access to your personal data and information about how we process it;
- to move, copy or transfer your personal data in certain circumstances and where feasible; and
- rights relating to automated decision making, including profiling.

The way we process your information and the legal basis on which we rely to process it will affect the extent to which these rights apply to you. If you would like to discuss or exercise any of these rights, please contact us using the details provided below.

You have the right to lodge a complaint with the Information Commissioner's Office where your information has or is being used in a way that you believe does not comply with data protection laws. We encourage you to contact us before making any complaint and we will seek to resolve any issues or concerns you may have.

Where we store your information

TAMAC will only store your personal data in the UK. This means that it will be fully protected under UK GDPR.

Depending on the service provided, TAMAC may from time-to-time transfer ('transfer' includes making available remotely) personal data to countries outside of the EEA.

If at any time we transfer your information to, or store it in, countries located outside of the EEA, we will ensure that appropriate safeguards are in place for that transfer and storage as required by the applicable laws.

Changes to this Privacy Policy

TAMAC may change this Privacy Policy from time to time. Any changes will be made available by posting an updated version on our website.

This policy was last updated on 23/01/2022.

How to contact us

Please contact us if you have any questions about our privacy policy or information we hold about you.

The firm's Data Protection Officer (DPO) is Mrs Christine Blaurock-Thomé, and can be contacted by emailing christine.thome@tamac.com or writing to:

The Data Protection Officer, TAMAC, Cholderton House, Cholderton, Salisbury, Wiltshire, SP4 0DW.