

Our contact details

Ecopragma Capital LLP
Address: 162 Buckingham Palace Road, London, SW1W 9TR
E-mail: info@ecopragma.capital

The type of personal information we collect

EcoPragma Capital (EPC) currently collect and process the following information:

We define Personal Data as "data relating to living, identifiable individuals". The information we collect and hold can be categorised as follows:

Employees and Prospective Employees – includes, but is not limited to, contact details, identification information, bank account details, background checks, employment history, performance information, remuneration, healthcare and pension arrangements.

Clients and Prospective Clients – in relation to our individual clients, includes, but is not limited to, contact details, identification information, bank account details, background checks, transaction histories etc. For our corporate clients, includes but is not limited to the names, and contact details of the individuals we interact with together with background and identification information of Directors and Officers that we are required to collect for regulatory purposes. For our prospective clients, primarily includes names and contact details but if being on-boarded could also include other information as described above.

Service Providers, Suppliers and Contractors – the names and business contact details of the individuals we interact with at our service providers, suppliers and contractors together with background and identification information that we are required to collect.

Other Business Partners / Contacts (e.g. banks, brokers, registrars, lawyers, accountants, actuaries, regulators, HMRC, investee companies, managing agents etc) – the names and business contact details of the individuals we interact with at these entities together with background and identification information that we are required to collect.

How we get the personal information and why we have it

EPC uses different methods to collect Personal Data including the following:

- personal details provided directly by employees, clients, suppliers & contractors and other business contacts; and
- information from third parties and publicly available sources e.g. Companies House, Registrars and Background Check Providers.

It should be noted that the website does not capture or record any Personal Data relating to website users/visitors.

We do not sell any Personal Data to third parties and we do not share Personal Data with third parties for the third parties' marketing purposes. However, we may need to disclose Data strictly on a need to know basis to our service providers, contractors, suppliers and other parties such as banks, brokers, lawyers, accountants, actuaries, regulators and HMRC.

Under the UK General Data Protection Regulation (UK GDPR), the lawful bases we rely on for processing this information are:

(a) **Your consent.** You are able to remove your consent at any time. You can do this by contacting us on info@ecopragma.capital

(b) We have a contractual obligation.

(c) We have a legal obligation.

(f) We have a legitimate interest.

How we store your personal information

EPC has put in place appropriate physical and technical measures to safeguard the Personal Data we collect in connection with our services. In addition, we limit access to Personal Data to those employees, agents, contractors and other third parties who have a business need to know. They will only process Personal Data on our instructions and are subject to a duty of confidentiality.

However, please note that although we take appropriate steps to protect Personal Data no device, computer system, transmission of data or wireless connection is completely secure and therefore we cannot guarantee the absolute security of Personal Data.

EPC retains Personal Data for as long as necessary to fulfil the purposes for which the Data has been collected as outlined in this Privacy Notice unless a longer retention period is required by law. Data is kept under regular review to ensure that it is not held longer than is strictly necessary, whilst taking account of Ecopragma's other regulatory obligations such as the requirement to retain evidence of anti-money laundering checks.

When Personal Data is no longer required for the purpose it was collected or as required by applicable law, it will be deleted or in certain circumstances returned to the data subject in accordance with applicable law.

Your data protection rights

Under data protection law, you have rights including:

Your right of access - You have the right to ask us for copies of your personal information.

Your right to rectification - You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

Your right to erasure - You have the right to ask us to erase your personal information in certain circumstances.

Your right to restriction of processing - You have the right to ask us to restrict the processing of your personal information in certain circumstances.

Your right to object to processing - You have the the right to object to the processing of your personal information in certain circumstances.

Your right to data portability - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

Please contact us at info@ecopragma.capital if you wish to make a request.

Changes to this Privacy Notice

EPC has the discretion to update this Privacy Notice at any time. When we do, we revise the updated date at the top of this page. We encourage Users to frequently check this page for any changes to stay informed about how we are helping to protect the personal information we collect. You acknowledge and agree that it is your responsibility to review this Privacy Notice periodically and become aware of modifications.

How to complain

If you have any concerns about our use of your personal information, you can make a complaint to EPC at

Contact: Henrietta Jowitt, Partner

Email: henrietta@ecopragma.capital

You can also complain to the ICO if you are unhappy with how we have used your data.

The ICO's address:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Helpline number: 0303 123 1113

ICO website: <https://www.ico.org.uk>