

Momentum Global Investment Management (MGIM) has issued this Privacy Policy in accordance with the provisions of the Data Protection Act 1998 and the European General Data Protection Regulation 2016/679 ('GDPR') which became effective from 25th May 2018 relating to your personal information ('Personal Data'). This Privacy Policy deals with personal information relating to financial intermediaries, investment platform companies and independent financial advisers.

This Policy explains how we use the personal information we may collect from you, or is provided to us about you or you provide to us when you use our website, visit our offices, enter into a legal contract with us, make use of our products or receive marketing information from us.

We process personal data that we obtain in the context of our business relationship. We also process personal data insofar as necessary to provide our services to you.

We take the privacy of your information seriously and we ask that you read this Privacy Policy carefully as it contains important information on:

- » the personal information we collect about you
- » what we do with your information,
- » who your information might be shared with,
- » how long we retain this information, and
- » what your legal rights are regarding your personal information.

In this document, 'we', 'us' and 'our' refer to MGIM, its subsidiaries, associated and affiliated companies and is addressed to financial intermediaries, investment platform companies and independent financial advisers and their representatives (hereafter 'Intermediary' or 'you') with whom we have contracted terms of business for the sale of MGIM products (hereafter 'Terms of Business'), or with whom we have a business relationship which facilitates the sale or distribution of our investment products or with whom we interact in the course of delivering and marketing our products and solutions.

This Policy deals with how we manage Personal Data which we receive in respect of our relationship with you and may be amended from time to time to reflect changes in our practices regarding the Processing of Personal Data, or changes in applicable law. We reserve the right to amend this Policy at any time without having to obtain your prior consent to such changes. For your assistance we have provided an entry on the Policy of the latest date that it was revised. We urge you to read this Policy carefully, and to review it periodically for changes.

The Data Controller

Momentum Global Investment Management (MGIM) is the data controller of Personal Data that you or the entity that you represent provides to us about you.

Company Registration No:	03733094
Registered office:	The Rex Building, 62 Queen Street, London EC4R 1EB
Telephone:	+44 (0) 207 489 7223
Email:	distributionservices@momentum.co.uk
Websites:	https://www.momentumgim.co.uk and http://harmonyportfolios.com/
LinkedIn:	https://www.linkedin.com/company/momentumglobalinvestmentmanagement/

Please be aware that we rely on your status as an Intermediary to be fully cognisant of your duties towards safeguarding the Personal Data of investors to whom you may recommend or promote our products and services ('Investors'). We do not in the normal course of our business relationship with you require you to provide us with the Personal Data of Investors. In exceptional cases it may be necessary for you to provide such personal information to us, in which case we will expect that you are acting as data controller of the Investor's Personal Data, and that you are duly authorised by the Investor to provide it to us, and that you will at all times act in accordance with the applicable data protection laws.

1. Personal data we collect

We process personal data that we obtain from you in the context of our business relationship or from parties with whom we have entered into Terms of Business. We also process - insofar as necessary to provide our service - personal data that we obtain from publicly accessible sources, (e.g. FCA registers) or that is legitimately transferred to us by other companies within the MMI Holdings Limited group or from other third parties who have been authorised to provide such information to us.

Relevant data is personal information (e.g. name, company name and address, phone number (work and mobile where provided), email address, job title, marketing preferences and other contact details and authentication data (e.g. sample signature). If we are entering into a Terms of Business with you personally, we may also collect your date and place of birth, nationality, personal address, bank account details and other identification data (e.g. passport or ID card details) as well as using risk management databases (e.g. World-Check) for assessing, managing and remediating risk.

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your working relationship with us.

The types of information we collect from you automatically may include: opening of emails, date and time emails were opened, links clicked on within emails and if emails are forwarded.

We and our website service provider may use a variety of technologies, including cookies and similar technologies, to assist in collecting this information.

2. The reasons we collect and process your data

We use your information for various purposes depending on the types of information we have collected from and about you and the specific facilities, services or products you use. In particular, we may collect your personal information for the following purposes:

- » to contact you in response to your enquiry about the products and services we offer;
- » to provide you with and /or administer the MGIM products and services you request;
- » to reply to your questions about subscriptions, redemptions and commission payments;
- » to provide you with information required to comply with agreements we have entered into;
- » to fulfil our regulatory and compliance obligations, including 'Due Diligence' checks;
- » for audit, compliance, controls and other risk management purposes;
- » to provide you with newsletters, investment updates, information about our forthcoming events and marketing communications unless you have requested us not to send these to you;
- » to conduct satisfaction surveys or research including obtaining your views on our products and services, where you agree to participate.

We may also create Personal Data about you, such as records of your interactions with us in order to monitor and improve our customer service standards and our relationship with you.

We will take reasonable steps to ensure that your Personal Data that we collect and process is limited to what is reasonably required for the purposes set out in this Policy.

3. Legal basis for using your information

- » Where you make an enquiry, ask a question or request information on a service or product, agree to receiving marketing communications or report a problem, we will rely on a lawful basis of processing, such as legitimate interest, performance of a contract or compliance with legal obligations, before we use your information;
 - » Where you have requested a service or product, the use of your information may be necessary for the performance of the Terms of Business or Intermediary Agreement we have entered into with you for the provision of those services or products;
 - » Where we have previously collected your information, and have used it to send marketing information to you, we may continue to use your information for our legitimate business interests, unless you request us not to do so.
-

4. Disclosure of personal data to third parties

Because of the international nature of our business, we may need to transfer your Personal Data outside the EU to companies within the MMI Holdings Limited group of companies and to third parties. In these cases, we will ensure that such transfers take place in accordance with applicable data protection laws and regulations. You can obtain further information regarding the mechanisms used to safeguard your data by contacting our Distribution Services Team at the contact details listed above. We are committed to keeping the data you provide us secure and have implemented appropriate technical and organisational security measures designed to protect your Personal Data against accidental or unlawful destruction, loss, alteration, unauthorised disclosure, unauthorised access, and other unlawful or unauthorised forms of Processing, in accordance with applicable law.

All MGIM employees and data processors (i.e. those who process your personal data on our behalf, for the purposes listed in Section 2), who have access to, and are associated with the processing of your personal data, are obliged to comply with safeguards to ensure the continued confidentiality and security of your information, and not to use it for any other purpose than to carry out the services that are being performed for you.

You are responsible for ensuring that any Personal Data that you send to us is sent securely.

5. Keeping your information

We will only keep your personal data for as long as we believe it necessary in order to fulfil the purposes for which it was collected, as set out in this Privacy Policy, and for as long as we are required to keep it by law and in order to fulfil our legal obligations and rights.

When determining the relevant retention periods, we will take into account factors including:

- » our contractual and business relationships with you;
- » legal obligations under applicable law to retain data for a certain period of time;
- » statute of limitations under applicable law(s);
- » the likelihood of disputes arising;
- » guidelines issued by relevant supervisory authorities; and
- » additional internal safeguards and restrictions placed on access to your Personal Data.

6. Usernames and passwords

Access to certain content on our website(s) may be allowed under a written (including electronic) agreement between you or your firm and MGIM and will require a username and/or password. In some cases, failure to provide personal information may prevent you from accessing these areas of the website(s) containing certain confidential client information. By accessing and using our protected and secured website(s), you agree to maintain the confidentiality of the username and password you selected to access such site(s).

7. Information for marketing purposes

You have choices when it comes to receiving communications from us. We will send you relevant updates about our products and services in a number of ways including by email. You can change your marketing choices at any time by:

- » replying directly to the message and requesting to be removed from the distribution list;
- » unsubscribing by clicking the appropriate link in any email you receive; or
- » contacting us. Refer to 'The Data Controller' section.

8. Links to other websites

Our website(s) may provide links to other third party websites. These links are provided for your convenience only and you should be aware that the information handling practices of the linked websites might not be the same as ours. You should review any privacy notices on those linked websites. MGIM is not responsible for the privacy policies or practices or the content of such external links.

9. Your privacy rights

You have several rights with respect to your information which are summarised below. More information on these rights can be found on the Information Commissioner's website: www.ico.org.uk

1. The right to access the personal data that we hold about you.
2. The right to make us correct any inaccurate personal data we hold about you
3. The right to make us erase any personal data we hold about you. This right will only apply where for example):
 - » we no longer need to use the personal data to achieve the purpose we collected it for;
 - » you withdraw your consent if we're using your personal data based on that consent; or
 - » where you object to the way we use your data, and there is no overriding legitimate interest
4. The right to restrict our processing of the personal data we hold about you. This right will only apply where for example:
 - » you dispute the accuracy of the personal data we hold;
 - » you would like your data erased, but we require to hold it in order to stop its processing;
 - » you have the right to require us to erase the personal data but would prefer that our processing is restricted instead; or
 - » where we no longer need to use the personal data to achieve the purpose we collected it for, but you need the data for legal claims.
5. The right to object to our processing of personal data we hold about you (including for the purposes of sending marketing materials to you).
6. The right to receive personal data, which you have provided to us, in a structured, commonly used and machine-readable format. You also have the right to make us transfer this personal data to another organisation.
7. The right to withdraw your consent, where we're relying on it to use your personal data (for example, to provide you with marketing information about our services or products).

If you would like to exercise any of your rights mentioned above, you can do so by contacting our Distribution Services Team using the details in the 'The Data Controller' section.

If you have any concerns about the way we process your personal data, or are not happy with the way we've handled a request by you in relation to your rights, you also have the right to make a complaint to the Information Commissioner's Office. Their address is:

First Contact Team
Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
SK9 5AF
Telephone: 0303 123 1113 or 01625 545745
Fax: 01625 524510

Issue 1 - May 2018
