Privacy Notice

This Privacy Notice explains how we use your personal data and describes the categories of personal data we process and for what purposes. We are committed to collecting and using such data fairly and in accordance with the requirements of the Data Protection Act 2018, and the Data (Use and Access) Act 2025. The Data (Use and Access) Act 2025 enhances your rights by giving you more control over how your data is accessed and used, especially in digital and automated contexts. It strengthens transparency and introduces stricter standards for how firms handle your personal information.

Why we are providing this notice

The UK GDPR applies to the collection, processing and storage of personal data undertaken by organisations established in the United Kingdom. Where we process personal data relating to individuals in the European Economic Area (EEA), we also comply with the EU GDPR.

The UK GDPR has two key aims:

- to set guidelines for the collection, processing and protection of personal data, and
- to give individuals rights in relation to their personal data, such as access, correction, objection, restriction, and deletion.

This Notice ensures that individuals outside our organisation with whom we interact, including visitors to our website, personnel of service providers, suppliers, and other third parties ("you" or "your"), understand what personal data Ptarmigan Capital Limited ("we", "us" or "our") may collect, how and why we use it, and with whom it may be shared in accordance with the UK GDPR.

Your rights in relation to your information

You have several rights under data protection law, including the right to:

- request access to your personal data and information about its processing;
- request correction or deletion of your data;
- request restriction or object to the processing of your data;
- request the transfer (portability) of your data to another party; and
- not be subject to automated decision-making, including profiling.

If you wish to exercise any of these rights, please contact us using the details below. You also have the right to make a complaint to the Information Commissioner's Office (ICO) if you are concerned about our handling of your data.

- Contact: Victoria Moffatt (Head of Compliance)
- Email: vmoffatt@ptarmigancapital.co.uk
- ICO website: https://ico.org.uk/make-a-complaint/

Legal basis for processing information

Most of the personal information you provide is processed under the lawful basis of contractual necessity, to enable us to provide financial advice and related services as agreed with you. In certain cases, we rely on legitimate interests where processing is

necessary for running our business and providing our services. Some information, particularly health data, requires your explicit consent, which you can withdraw at any time.

Personal data we collect

Personal data means any information relating to an identifiable individual. We are the data controller responsible for deciding how to hold and use personal data about you. We may process your data directly or through third parties acting as data processors on our behalf.

Special category personal data

We do not seek to collect special category data such as information revealing racial or ethnic origin, political opinions, religious beliefs, trade union membership, genetic or biometric data, or data concerning health or sexual orientation. Should such data arise (for example, if you choose to share it with us voluntarily), we will handle it with special protection and only process it with your explicit consent or as otherwise permitted by law.

What information we use

We may collect and process information including your name, address, contact details, email, telephone number, job title, correspondence records, financial and investment information, website usage, and technical data such as IP address, browser type, and login data.

How we collect information

We typically collect personal data:

- directly from you in meetings, calls or through our website;
- from investment, pension or insurance providers, with your authority;
- from your professional advisers, where you have consented; and
- through recorded calls, meeting notes, or correspondence.

How we use your personal information

We use your information to assess your financial needs, provide tailored advice, fulfil regulatory obligations, and maintain our professional records. We only share information as set out here or where required by law or regulation.

Sharing and transferring information

We may share your data with:

- Professional advisers such as auditors, lawyers, and insurers.
- Pension and investment providers.
- Custody banks and administrators.
- Compliance and anti-money laundering service providers.
- Regulators and law enforcement where legally required.

Where personal data is transferred outside the UK, we ensure an adequate level of protection through the use of UK adequacy regulations or appropriate safeguards such as the International Data Transfer Agreement (IDTA) or the UK Addendum to the EU Standard Contractual Clauses.

Retention of information

We retain personal data only as long as necessary to provide services to you and comply with our legal and regulatory obligations. After this period, your data will be securely deleted or anonymised.

Accuracy of information

Please notify us if your personal data changes during your relationship with us so we can keep our records accurate and up to date.

Fees and verification

You will not usually have to pay to access your personal data or to exercise your rights. We may charge a reasonable fee if a request is clearly unfounded or excessive. We may require proof of identity before fulfilling certain requests.

Updates to this Notice

We may update this Privacy Notice from time to time. Any significant changes will be communicated to you, and the latest version will always be available from us directly.

Use of Artificial Intelligence (AI)

We may use Artificial Intelligence (AI) or machine learning technologies in certain aspects of our services or operations. Where this is the case, we do so in accordance with data protection legislation, and only where appropriate safeguards are in place.

AI Assisted Communication or Document Drafting

We may use AI tools to assist in the drafting of communications and to assist with information gathering for investment research. These tools may analyse information to improve clarity, accuracy, or efficiency. No automated decisions are made, and all outputs are reviewed and approved by a Portfolio Manager or Compliance Officer before being issued.

AI Driven Business Analysis or Insights

We may use AI-powered analytics to identify business trends, client preferences, or improve internal operations. These tools process anonymised or aggregated data to ensure individuals are not identified. All outcomes are interpreted and actioned by human decision makers.

AI in Fraud Detection or Security

AI systems may be used to monitor systems or transactions for suspicious patterns that could indicate fraud or cybersecurity threats. These systems operate in real-time and may trigger alerts for manual investigation.

Automated Decision-Making

We do not carry out any fully automated decision making that produces legal or similarly significant effects without human involvement. If this position were to change, you would be notified and provided with your rights under data protection law.

Last updated: September 2026