

Introduction

Who are we?

Strata Global Limited (“SGL”) is authorised and regulated by the Financial Conduct Authority Firm Reference Number 563834 registered in England and Wales No: 07707508 Registered office at 7-11 Moorgate, London EC2R 6AF.

This Privacy Notice is issued on behalf of SGL so when we mention “SGL”, “we”, “us” or “our” in this privacy notice, we are referring to Strata Global Limited.

Controller

SGL is the controller and is responsible for your personal data and this website.

We have appointed a Data Privacy manager who is responsible for overseeing questions in relation to this Privacy Notice. If you have any questions about this Privacy Notice, including any requests to exercise your legal rights, please contact the Data Privacy manager using the details set out below.

Contact Details

Name: Jane Foreman. Email address: jane.foreman@strataglobal.co.uk

What’s this policy about?

This privacy notice aims to give you information on how SGL collects and processes your personal data through your use of this website and when you sign up for our materials, products, or services. This website is not intended for children and we do not knowingly collect data relating to children.

It is important that you read this privacy notice when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data.

SGL is committed to ensuring that your privacy is protected. Should we ask you to provide certain information by which you can be identified when using this website, then you can be assured that it will only be used in accordance with this privacy statement.

SGL may change this policy from time-to-time by updating this page. You should check this page from time-to-time to ensure that you are happy with any changes. Where appropriate, we will actively notify you.

The Data We Collect About You

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store, and transfer different kinds of personal data about you which we have grouped together as follows:

Personal data	What it includes
Identity Data	First name, last name, marital status, maiden name, title username or similar identifier, date of birth, place of birth, gender, nationality, and national insurance details.
Contact Data	Billing address, delivery address, residential address, email address and telephone numbers
Employer & Recruitment Data	The identity of your employer and your role. CV, photograph, covering letter and supporting information, employment & education history, desired role(s) and other information you or a recruiter may supply in connection with a prospective or actual job application
Know Your Client/Anti Money Laundering (KYC/AML)	Personal data in materials used to establish and verify identity, nationality, date of birth, address, status/role (such as role as director, shareholder, beneficial owner or similar) and source of wealth and funds, such as passport, driving licence, utility bills, bank statements, Companies House records, incorporation and associated materials, information on the electoral roll or sanctions lists, details of politically exposed persons, credit reference agency data, and in some cases biometric data such as video/images of you
Fitness and Propriety Data	Relating to applications in respect of the Approved Person or the Senior Managers and Certification Regimes or similar applications to the Financial Conduct Authority, the Prudential Regulation Authority, or other regulators, authorities, or bodies and may include academic qualifications, employment, and experience data, references, credit history, criminal offences and criminal conviction data, performance and disciplinary records, regulatory status, directorships, etc

Personal data	What it includes
<i>Visits</i>	<i>Records (including date, time, location) of appointments or attendance at our offices or events or occasions where we entertain our clients, dietary preferences, information about disabilities (for example where adjustments or special arrangements are necessary)</i>
<i>CRM</i>	<i>Records of our interactions with business contacts, such as telephone, meeting, and video call notes, records, transcripts and messages, enquiries, and other email correspondence (and correspondence received through forms on our websites, if any) and your marketing preferences (such as consent to marketing, unsubscribe requests, and details of the type of information or marketing you are or may be interested in)</i>
<i>Financial</i>	<i>Bank account details, payment card details</i>
<i>Transaction Data</i>	<i>Details of products/services provided by us and details about payments to and from you</i>
<i>CCTV</i>	<i>CCTV audio and video recordings on our premises</i>
<i>Technical Data</i>	<i>Includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access our website.</i>

How is your Personal Data Collected?

We use different methods to collect data from and about you including through:

- Direct interactions. You may give us your personal data by filling in forms or by corresponding with us in person, by post, by telephone, or by email. This includes personal data you provide when you:
- apply for our products or services;
- Request marketing to be sent to you;
- Indirectly from employers and potential employers where they are lawfully entitled to do so; and
- Automated technologies or interactions. As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions, and patterns. We collect this personal data by using cookies, server logs, and other **similar** technologies. We may also receive Technical Data about you if you visit other websites employing our cookies.

How we use your Personal Data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract, we are about to enter into or have entered into with you;
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests; and/or
- Where we need to comply with a legal or regulatory obligation.

We may rely on consent as a legal basis for processing your personal data but where we do, you have the right to withdraw consent at any time by contacting us.

Purposes for which we will use your Personal Data

In the table below, we have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are, where appropriate.

Purpose/Activity	Type of Data	Lawful basis for Professing including basis of legitimate interest
<i>New Clients</i> <i>To on-board you as a new client:</i>	(a) <i>Identity</i> (b) <i>Contact</i> (c) <i>Employer</i> (d) <i>Financial</i> (e) <i>Transaction</i> (f) <i>Marketing</i> <i>Communication</i>	(a) <i>Performance of a contract with you</i> (b) <i>Necessary for our legitimate interests (to identify you, deliver the product and/or service purchased, and recover debts due to us)</i>

<p>New Clients To deliver the product and/or service purchased and process same including:</p> <p>(a) Undertake the work for which we have been appointed/contracted (b) Manage payments and fees and charges (c) Collect and recover money owed to us</p>	<p>(a) Identity (b) Contact (c) Employer (c) Technical (d) Usage (e) Communications (f) Technical</p>	<p>Necessary for our legitimate interests (to study and assess how clients use our products/services), to develop them, to grow our business and improve our services</p>
<p>Business Development To make suggestions and recommendations to you about products or services that may be of interest</p>	<p>(a) Identity (b) Contact (c) Employer (c) Technical (d) Usage (e) Marketing and Communication</p>	<p>(a) Necessary for our legitimate interests (to develop our products/services and grow our business) (b) Consent</p>
<p>Regulatory We process the following data to comply with our regulatory obligations, including fraud, political exposure, and anti-money laundering and sanction checks and other regulatory obligations:</p>	<p>(a) Contact (b) KYC/AML (c) Financial (d) Recruitment</p> <p>In some instances, we may ask for your consent to use biometric means to verify identity.</p>	<p>In order to comply with our regulatory obligations.</p> <p>This data will be collected from you, our clients and contacts, or from third party sources including public sources such as Companies House or the Land Registry and credit reference agencies, KYC and AML vetting or similar service providers.</p>
<p>Security To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting, and hosting of data)</p>	<p>(a) Identity (b) Contact (c) Employer (d) Technical (e) Usage (f) Communications</p>	<p>(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation to maintain confidentiality and security.</p>
<p>Recruitment We may require the following data when receiving job applications or similar materials to determine whether to interview and hire candidates:</p>	<p>(a) Covering letter (b) CV (c) Supporting information (d) Regulatory Reference (e) AML/Financial</p>	<p>We collect this data directly from you or from a recruiter.</p> <p>To pursue our legitimate interests in deciding whether to progress a job application and in communicating with you or a recruiter about the process.</p> <p>We may also process this information to comply with regulatory requirements for example to understand and apply visa or right-to-work requirements.</p>
<p>Working with Suppliers We process the following data to identify and work with suppliers and their personnel for their services and to provide services to our clients, as well as processing payments and for accounting and audit purposes:</p>	<p>To pursue our legitimate interests in identifying and working with appropriate suppliers and delivering services to our clients.</p> <p>(a) Contact (b) KYCL (c) Financial</p>	<p>To comply with our Regulatory obligations</p> <p>We collect this data directly from suppliers and their personnel or from their websites and other similar public sources.</p> <p>Where suppliers are individuals, for the performance of contractual obligations or prior to entering a contract at their request.</p>

If you Fail to Provide Personal Data

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract or service but we will notify you if this is the case at the time.

Further information

Change of Purpose

We will only use your personal data for the purposes for which we collected it unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please [Contact Us](#).

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

Disclosures of your Personal Data

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph above.

Internal third parties who will be members of the Strata Group.

External third parties including the Financial Conduct Authority, the Prudential Regulatory Authority, the National Crime Agency, the Serious Fraud Office, the Financial Ombudsman, the Information Commissioner's Office, Her Majesty's Revenue and Customs, our solicitors, and other business partners.

Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

International Transfers outside the EEA

Some of our external third parties are based outside the European Economic Area (EEA) so their processing of your personal data will involve a transfer of data outside the EEA.

Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission.

We may use specific contracts/clauses approved by the European Commission which give personal data the same protection it has in Europe.

Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US.

Data Security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used, or accessed in an unauthorised way, altered, or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors, and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

Data Retention

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process

your personal data, and whether we can achieve those purposes through other means, and the applicable legal requirements. We maintain your personal data in accordance with our Personal Data Retention Policy which is available on request.

In some circumstances, you can ask us to delete your data: see below for further information.

Your Legal rights?

Under certain circumstances, you have rights under data protection laws in relation to your personal data which are:

- **Data Subject Access Request** to your personal data (commonly known as a “SAR”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- **Request the erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully, or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- **Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- **Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data’s accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- **Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- **Withdraw consent** at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact the Data Privacy Manager. If we rely on consent to process personal data, you can withdraw consent at any time either by writing to us at the same email address or by using unsubscribe links in our email.

You have the right to make a complaint at any time to the Information Commissioner’s Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO, so please contact us in the first instance.

No Fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive, or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number or several requests. In this case, we will notify you and keep you updated.