LPFI Client Privacy Notice

2026

LPFI

Overview

This notice sets out how and why LPFI Limited collects and processes personal data in accordance with the requirements of the data protection legislation.

Information which LPFI collects

As a data controller, LPFI collects personal data from data subjects associated with its clients (such as officers or authorised signatories) in connection with the services it provides. This can include names, dates of birth, contact details such as email address, telephone numbers and residential addresses. LPFI uses client on-boarding questionnaires, and annual AML and suitability confirmations which require copies of passports and driving licences to be provided, to collect this information, or it may directly request specific information from data subjects on an ad-hoc basis.

When clients are in contact with LPFI by phone, LPFI will collect and store the data subject's phone number and a recording of the call to ensure compliance with LPFI's rules and processes.

It may be necessary for LPFI to collect certain personal data, which is sensitive in nature, for example, to allow LPFI to comply with anti-money laundering laws or other laws, regulations or policies that apply to the organisation. However, this information is kept to a minimum and any information that is not relevant will be deleted.

Basis for processing

In most cases, LPFI's lawful basis for processing the personal data is because it needs to do so to satisfy its legal obligations (e.g. under anti-money laundering regulations). On occasion, the reason LPFI processes personal data is because it needs to in order to meet its contractual obligations to clients in relation to the service it provides, or to take steps, at the client's request, before entering into a contract.

LPFI may collect personal data from the client, directly from the data subject, from any other person to which LPFI reasonably believe the data subject has given its consent to share such data with LPFI, and from publicly accessible websites. LPFI will ensure that all information is kept up to date to accurately reflect the client's situation and details.

How personal data is used

LPFI may use personal data relating to the data subjects associated with its clients for the following purposes:

- To communicate with the client's officers and employees in relation to its services
- To process identification details of the data subjects associated with the client (such as officers or authorised signatories) in order to confirm their identities to confirm their authority to sign legal documents (including but not limited to any subscription deed, partnership agreements and side letters, powers of attorney or sale and purchase agreements); and/or confirm the client's source of funds in order to comply with applicable anti-money laundering, anti-terrorist financing and similar laws, regulations and policies

- To comply with "know your client", anti-money laundering, anti-terrorist financing, creditworthiness, eligibility and any other checks carried out by: (a) any fund manager or service provider relevant to any of the client's investments; (b) any person from which, or alongside which LPFI intends to purchase fund interests on the secondary market; and (c) any person who provides services to LPFI or any member of LPFI's group
- To check such personal data against databases of individuals who are subject to sanctions, classified as "politically exposed persons" or have committed crimes and to follow up any suspicions to ensure that LPFI complies with its anti-money laundering and terrorism obligations and to avoid fraud itself
- To record or monitor communications issued by LPFI to the client
- To meet LPFI's legal, tax, compliance and regulatory duties
- To facilitate, support and/or enhance LPFI's operations and functions
- For any other purpose that LPFI reasonably determines is necessary or desirable in connection with the services it is appointed to provide to a client.

Disclosure of Personal Data

The processing activities described above may require LPFI to disclose personal data to its service providers to provide administration or other services to LPFI, in connection with its services to clients.

LPFI and/or its service providers may also disclose and/or transfer personal data to other members of its group, or its employees, officers, agents, delegates, sub-processors, sub-contractors, tax, legal and other advisors, auditors, administrators, brokers, accountants, custodians, investors and/or potential investors, placement agents, vendors or purchasers of investments, banks or other financial institutions or finance providers, registrars, tax authorities and/or other competent regulatory or governmental authorities or bodies, or any of the aforementioned persons' service providers, agents or advisers.

In some cases, recipients of personal data may be outside the UK. As such, personal data may be transferred outside the UK to a jurisdiction that may not offer an adequate level of protection as is required by the UK Government. If this occurs, additional safeguards must be implemented with a view to protecting personal data in accordance with applicable laws. Please contact us if you want more information about the safeguards that are currently in place.

Retention

Personal data will be retained for as long as required or permitted by data protection legislation and/or as required for LPFI and any other person to whom the personal data may be provided for the purposes set out in paragraph headed 'Basis of Processing', including as required by the Markets in Financial Instruments Directive 2004/39/EC (as subsequently amended from time to time). The precise length of time we retain personal data depends on the purpose for which we collect and use it and what we are required to do to comply with applicable laws and to establish or defend our legal rights.

Access and Control

A data subject may, under certain circumstances:

- Withdraw its consent to processing of personal data (where applicable)
- Access its personal data and transfer its personal data to another controller
- Rectify its personal data
- Restrict the use of its personal data
- Request that its personal data is erased
- Object to the processing of its personal data.

The circumstances in which a data subject may take any of the above actions are set out in data protection legislation.

Where LPFI has relied on consent to process personal data, a data subject has the right to withdraw consent at any time by contacting the client's LPFI client contact. Please note that where consent is withdrawn, this may impact the service which LPFI can provide to the client.

You can obtain further information about your rights from the Information Commissioner's Office at www.ico.org.uk or via its telephone helpline (0303 123 1113).

Make a complaint to the Information Commissioner

If you wish to exercise any of these rights or have any queries or concerns regarding the processing of your personal data, please contact us at LPFImail@lpf.org.uk. You can submit a data protection complaint to us by filling in our complaints form, which is available at Complaints and appeals.

You also have the right to lodge a complaint in relation to this privacy notice or our processing activities with the Information Commissioner's Office, which you can do through the website above or their telephone helpline.

Updates

A copy of this notice is provided to LPFI's clients prior to the launch of services. We may update this notice periodically. Where we do this, we will inform you of the changes and the date on which the changes take effect.

This Privacy Notice was last updated in May 2026.