

Dialstone Capital Privacy Policy

Last updated: 1 May 2026

1. Introduction

This Privacy Policy explains how **Dialstone Capital Ltd** (“we”, “us”, “our”) collects, uses, stores and discloses your personal data when you interact with us for services (the “**Service**”). We process your personal data in accordance with the United Kingdom General Data Protection Regulation (“UK GDPR”), the Data Protection Act 2018 and any other applicable data-protection law. By using the Service you acknowledge this Policy and the practices described herein.

Dialstone Capital is registered as a data controller in the United Kingdom. Our registration details can be found via the Information Commissioner’s Office Search Register. One of our responsibilities as a data controller is to be transparent in our processing of your personal data and to tell you about the different ways in which we collect and use your personal data.

2. Definitions

Term	Meaning
Affiliate	Any entity that controls, is controlled by, or is under common control with Dialstone Capital Ltd . “Control” means ownership of $\geq 50\%$ of voting securities.
Controller	The natural or legal person that determines the purposes and means of processing personal data. Unless otherwise stated, Dialstone Capital Ltd is the Controller.
Cookie	A small text file placed on your device which stores information such as preferences or login status.
Device	Any device that can access the Service (e.g., desktop, tablet, mobile telephone).
Personal data	Information relating to an identified or identifiable individual (“data subject”).
Processor	A natural or legal person that processes personal data on behalf of the Controller (e.g., cloud-hosting provider).
Usage data	Information that is automatically collected when you interact with the Service (e.g., IP address, browser version, time spent on pages).
You / your	The individual using the Service or, where applicable, the organisation on whose behalf the individual acts.

3. Types of data we collect

- **Personal data you provide directly**
 - Email address (business and personal)
 - First and last name
 - Telephone number (business and personal)
 - Mobile number (business and personal)
 - Postal address (business and personal)
 - Job Title
 - Date of birth;
 - Nationality;
 - Copy of your passport or other form of photographic ID;
 - Corporate and personal Bank Details;
 - Source of wealth and source of funds;
 - FCA/CSSF/GFSC registration number (if applicable);
 - List of directorships;
 - Employment history;
 - Criminal convictions;
 - Credit reports/ratings;
 - Whether you are a politically exposed person(s);
 - Whether you are on a sanctioned or watch list; and
 - Other information about you which you may provide to us in the course of us providing the agreed services.

In certain circumstances, the information we hold about you may include special category data (as defined in the UK GDPR), including data which reveals your ethnicity, your political opinions, your health or your criminal convictions.

- **Usage data** – collected automatically when you use the Service, including:
 - IP address, browser type and version
 - Pages visited, date/time stamps, time spent on each page
 - Device identifiers and diagnostic information
 - Mobile-specific information (device model, operating system, mobile browser)

4. Lawful basis for processing

We process your personal data only where at least one lawful basis set out in Article 6 UK GDPR applies:

Lawful basis	Typical examples
Contract	Creating and administering your Account; supplying goods or services you order.
Consent	Sending you marketing communications. You may withdraw consent at any time.
Legal obligation	Complying with tax, accounting or regulatory duties.
Legitimate interests	Providing, securing and improving the Service, fraud prevention. We balance these interests against your rights.
Vital interests	Protecting life or physical safety (rare).

If we rely on your consent, we will ask for it explicitly and retain a record of the date and method.

5. How do we collect your personal data?

We collect your personal data through the following channels ("**Collection Channels**"):

- a) when you subscribe to our newsletters or events;
- b) when you complete one of our surveys;
- c) by you otherwise interacting with us a prospective, current or former client or customer;
- d) by you or your employer providing us with personal data to assist us in fulfilling a contract for services with you;
- e) by you providing personal data to us, or your employer providing personal data s to us, in connection with a service you or your employer provides to Dialstone; and/or
- f) by you contacting us or otherwise providing your personal data to us, directly or indirectly.

6. How we use your data

- **To operate and maintain the Service**
- **To manage your Account** and provide customer support
- **To perform a contract** you have entered into with us
- **To communicate with you** about updates, security notices and service information
- **To send you news, offers or event information** similar to items you have already purchased or enquired about (*opt-out available*)
- **To analyse and improve** functionality, user experience and marketing effectiveness
- **For business transfers** such as mergers or acquisitions (see Section 9)
- **For any other purpose with your consent**

7. Sharing Your Data

We disclose personal data only as necessary:

Recipient	Purpose	Safeguards
Service providers / processors	Hosting, analytics, email delivery, customer-support tools. Third parties who provide services on our behalf. Maintenance of FCA registration	Data-processing agreements; confidentiality and/or duty of care
Affiliates and group companies	Internal administration, consolidated reporting.	Same level of protection as this Policy.
Business partners	Joint promotions or integrated services you choose to use.	Only with your knowledge.
Successors	In case of merger, acquisition or asset sale.	Notification to you; contractual commitments.
Public authorities	Where required by law or court order.	Verified, lawful requests only.
Other users	If you post content or interact publicly on the Service.	Under your control.
With your consent	Any other disclosure you expressly agree to.	Documented consent.

8. International Transfers

We may transfer personal data outside the UK/EEA. Where we do so we will:

- Rely on an adequacy decision, or
- Use approved safeguards such as the UK Addendum to the EU Standard Contractual Clauses ("SCCs"), or
- Obtain your explicit consent where no other mechanism applies.

A copy of relevant safeguards is available on request (see Section 12).

9. Data Retention

Data category	Typical retention period	Rationale
Account data	Active + 7 years	Limitation periods for legal claims.

Data category	Typical retention period	Rationale
Transactional records	Active + 7 years	Statutory financial record-keeping.
Marketing preferences	Until opt-out + 3 years	Proof of consent.
Usage data (analytics)	24-36 months	Trend analysis and Service improvement.

We may anonymise data for statistical purposes; anonymised data is no longer personal data.

10. Your Rights

Under the UK GDPR you have the right to:

1. **Access** – obtain a copy of your personal data.
2. **Rectification** – correct inaccurate or incomplete data.
3. **Erasure** – have your data deleted (“right to be forgotten”).
4. **Restriction** – pause processing under certain conditions.
5. **Data portability** – receive data in a structured, machine-readable format.
6. **Object** – to processing based on legitimate interests or direct marketing.
7. **Withdraw consent** – at any time where processing is based on consent.
8. **Lodge a complaint** – with the Information Commissioner’s Office (ICO) or another supervisory authority.

To exercise any right, contact us using the details in Section 12. We will respond within one month.

11. Data Security

We employ appropriate technical and organisational measures, including access controls and staff training. We restrict access to personal data to those employees, agents, contractors, consultants and other third parties who have a business need to access the personal data. Despite our efforts, no online transmission or storage system is completely secure; you use the Service at your own risk.

12. Contact

For more information on your rights, if you wish to exercise any right, for any queries you may have or if you wish to make a complaint, please contact our Data Protection Officer.

- **Email:** info@dialstonecapital.com
- **Postal address:** Data Protection Officer, Dialstone Capital Ltd, Spencer House, 23 Sheen Road, Richmond, TW9 1BN
- **Telephone:** +44 (0)20 7088 8140

If you are not satisfied with our response you may contact the ICO: www.ico.org.uk, tel. 0303 123 1113.

13. Changes to this Policy

We may update our privacy policy at any time. The current version of our privacy policy can be found below, and we encourage you to check here regularly to review any changes.

We may amend this Privacy Policy from time to time. We will:

- Post the revised version on this page;
- Update the "Last updated" date above;

Continued use of the Service after changes take effect constitutes acceptance of the revised Policy.