

General Data Protection Regulation Privacy Notice September 2024

Neville, Rodie & Shaw, Inc. is providing you with this notice as required by the General Data Protection Regulation (GDPR).

What information we collect

Neville, Rodie & Shaw, Inc. (“We”) gather certain information from and about you, the data subject.

We are a Controller and Processor of this data, meaning we direct the processing of the data and we process the data, which includes the following:

- Names
- Contact information including phone numbers, addresses, and email addresses
- Information to verify your identity, which can include Social Security number, Passport number, Tax ID number, and account identification numbers)
- Biographical information, which can include age, sex, date of birth, marital status, and the same about members of your immediate family
- Economic information, which can include employment status, compensation, assets and liabilities, and information about your bank accounts and investment holdings
- Information to track your interactions with our client portal, including usernames

Neville, Rodie & Shaw, Inc. does not process Special Categories of Personal Data under GDPR, which include personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person’s sex life or sexual orientation.

Why we collect it

We gather your personal information in order to provide investment management services to you, and to provide you with invoices, reports, and notifications relating to your account(s) with us and about our firm and our services to you.

What we do with it

We process your personal information at our office in New York, New York, USA.

We store your personal information on cloud-based servers located in the United States, and on cloud-based and/or on-premises servers maintained by or for the benefit of the following third parties.:

Third Party Recipient	Purpose	Safeguards
Fiserv APL	Portfolio management system	Binding and enforceable contract Policies SSAE 18 SOC 1 Type Audit report each year
Fidelity Investments	Brokerage and custodial services	Binding and enforceable contract SSAE18 Type 2 Policies
Global Relay	Email archiving	Binding and enforceable contract Policies SOC 2 Type I & II
Ascendant Compliance (Confluence)	Compliance and cybersecurity consultants	Binding and enforceable contracts Policies SSAE16 Type II SOC1, SOC2 (Security and Availability Only), and SOC3 Audit
Salus GRC	Compliance and cybersecurity consultants	Binding and enforceable contract Policies Data stored on vendors with SOC2 Type 2 audit
TMG – The McNamara Group	Reconciliation outsourcing	Binding and enforceable contract SSAE16 SOC 1
Noviant	Managed IT services	Binding and enforceable contract All of their vendors are SOC2 Process of becoming ISO 27001

We also back up your data to our data center located in the United States, and on servers hosted in the United States.

We do not share your personal information with third parties unless necessary in furtherance of our services to you, or as required by law. We do not sell your personal data to any third parties.

How long we maintain it

We are subject to record retention requirements set forth by the United States Securities and Exchange Commission. Personal data is retained in compliance with applicable laws and regulations in the United States, primarily Rule 275.204-2 under the Investment Advisers Act of 1940 (the “Books and Records Rule”). This means that we are obligated to keep your personal data for a period of at least five years from the end of the fiscal year during which we last updated the record.

We maintain a Data Destruction Policy that says we will destroy your personal data after we are no longer required to maintain it. We will delete your contact information from our internal system when you notify us that you do not wish to be contacted by us.

What you can do

Under the GDPR, you have certain rights about the personal data we gather and use about you:

- If you think any personal information we have about you is inaccurate or incomplete, you have the right to ask us to see the information, ask us to change it, or ask us to delete it. You can make any of these requests by contacting our Chief Compliance Officer at 212-725-1440.
- If you wish to opt out of us collecting certain personal information from you, you can contact our Chief Compliance Officer at 212-725-1440. In the case of marketing, where Neville, Rodie & Shaw, Inc. collects and stores personal data based on consent, you have a right to withdraw consent at any time.
- If you have a concern or complaint about our processing of your personal data, you have the right to notify your EU jurisdiction.