



PCEF-POL-004

Privacy & Data Protection Policy

Premier Choice Energy Fund Ltd

Version	1.0	Effective Date	May 2026
Next Review	May 2027	Classification	Controlled Document
Owner	Compliance & Risk	Approved by	Board of Directors

1. Introduction

Premier Choice Energy Fund Ltd ("PCEF") is committed to protecting the privacy and security of personal data. This Policy explains how we collect, use, store, and protect personal data in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

PCEF is registered as a data controller with the Information Commissioner's Office (ICO). Registration Number: XXXXXXXX.

2. Personal Data We Collect

We may collect and process the following categories of personal data:

- Identity data: name, title, date of birth, national insurance number
- Contact data: email address, postal address, telephone number
- Financial data: bank account details, investment amounts, source of funds documentation
- KYC/AML data: passport copies, utility bills, PEP screening results, adverse media searches
- Professional data: employer, job title, professional qualifications and memberships
- Technical data: IP addresses, browser type, website usage and analytics data

3. Lawful Basis for Processing

We process personal data on the following lawful bases:

- Contract: processing necessary for the performance of investment agreements
- Legal obligation: processing required to comply with FCA rules, AML regulations, and tax obligations
- Legitimate interests: fraud prevention, security, and business operations
- Consent: where you have given specific consent (e.g., marketing communications)



4. Data Retention

Personal data is retained only as long as necessary, subject to applicable legal obligations:

- Investor KYC records: 5 years from end of business relationship (FCA/AML requirement)
- Investment records and correspondence: 7 years from the relevant transaction
- Employee records: 7 years from end of employment
- Website analytics: 26 months

5. Your Rights Under UK GDPR

You have the right to: access your personal data; request rectification of inaccurate data; request erasure in certain circumstances; restrict processing; data portability; and object to processing based on legitimate interests.

To exercise any of these rights, contact our Data Protection Officer at: dpo@premierchoiceenergyfund.co.uk

6. Data Security

We implement appropriate technical and organisational measures including: encryption of data in transit and at rest; multi-factor authentication and access controls; regular penetration testing; staff data protection training; and a documented incident response procedure.

7. Complaints

If you are dissatisfied with how we have handled your personal data, you have the right to lodge a complaint with the Information Commissioner's Office at www.ico.org.uk or by telephone on 0303 123 1113.

AUTHORISATION

Role	Name	Signature	Date
Chief Executive Officer	_____	_____	May 2026
Chief Compliance Officer	_____	_____	May 2026
Board Chairman	_____	_____	May 2026

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