

Privacy Notice

May 2019

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We, meaning Colchester Global Investors Limited of 20 Savile Row, London W1S 3PR (Colchester) and all associated companies, as the Data Controller, are committed to maintaining the confidentiality, integrity and security of personal information provided by current, past and prospective clients. Colchester and its affiliates will collect and hold your personal information in a fair and lawful manner, and not in an intrusive way. This notice outlines how we will collect and use your information.

'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).

1. How we collect your Personal Information

We collect and use information about you if you visit our website, utilise our services, make client enquiries or send other communications, apply for jobs at Colchester, register for information or when you respond to communications by us.

Your relationship with us will determine why we collect particular information about you. We may be required by law to collect certain information; require it in order to perform a contract, or prior to entering into a contract with you; or use it for our legitimate business interests where these do not override your rights or interests.

We may collect and use the personal information you give us through some of the following means:

- (a) when you make an inquiry or order in relation to financial products or services through our website located at www.colchesterglobal.com;
- (b) when you complete and submit an application form to us;
- (c) in administering and performing any contracts with service providers;
- (d) when you contact us via telephone, email or facsimile;
- (e) from correspondence (whether in writing or electronically);
- (f) through any mobile applications provided by our organisation;
- (g) while conducting customer satisfaction and market research surveys, for which you have given your consent;
- (h) when administering any of our services;
- (i) when processing information that is required or requested by regulatory bodies or law enforcement agencies;
- (j) when notifying you of any events we hold which we think may be of interest to you; and
- (k) as otherwise required to manage our business.

In certain cases, we may also collect personal information from publicly available sources and third parties, such as suppliers, contractors, investors and business partners.

If we collect personal information about you from a third party, the third party must inform you that we are holding such information, how we will use and disclose it, and that you may exercise any of your rights detailed under clause 7 of this privacy notice.

Where you do not wish to provide us with your personal information, we may not be able to provide you with the financial products or services that you have requested.

2. What Personal Information will we collect

Below we list some of the most common categories of personal information we may collect about you:

- a) Your contact details (including name, date of birth, title, postal address, telephone number and email address) to keep in touch with you and/or contract with you;
- b) Financial information from an individual and/or supplier in order to fulfil any contractual obligations we have with your business or with a view to enter into a contract with you. This can include your bank account information;
- c) Any personal information you choose to give us when contacting Colchester or when you complete any surveys, registration process and/or provide us with your views and opinions;
- d) Sensitive personal information relating to your health, race or ethnicity, for monitoring equal opportunities and/or to provide you with the necessary support when attending our events and/or sites; and
- e) Other operational data, including business registration details, tax file numbers and details of any financial adviser or intermediary.

3. Who has access to your personal information

Your personal information will be processed by employees of Colchester in order to fulfil our obligations to you as outlined in this notice. We may also share your details with third parties including:

- a) Contractors working on behalf of or in partnership with Colchester;
- b) Our third-party suppliers/service providers who perform functions on our behalf under contract, support our systems, operations and/or processes;
- c) Tax, audit, or other authorities, when we believe in good faith that the law or other regulation requires us to share this information, for example, where processes and systems are being compliance assessed by Colchester's corporate audit or their representatives;
- d) Law enforcement or other regulatory bodies who can legally request access to information about you for prevention and detection of crime, the apprehension or prosecution of offenders, and the assessment or collection of tax.

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

4. Protection of your information

All information Colchester obtains about you is treated as confidential, unless such information is publicly available. Colchester exercises the same level of care dealing with your personal information as it does in handling its own internal confidential information.

We will hold personal information as either secure physical records, electronically on our intranet system, in cloud storage, and in some cases, records on third party servers, which may be located in different overseas locations.

We maintain appropriate physical, procedural and technical security for our offices and information storage facilities so as to prevent any loss, misuse, unauthorised access, disclosure, or modification of personal information. This also applies to disposal of personal information.

We further protect personal information by restricting access to personal information to only those who need access to the personal information to perform their job or who have a business need to know. Physical, electronic and managerial procedures have been employed to safeguard the security and integrity of your personal information.

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

5. Direct marketing

Like most businesses, marketing is important to our continued success. We believe we have a unique range of products and services that we provide to investors at a high standard. We therefore like to stay in touch with investors and let them know about new opportunities.

We rely on legitimate interests to provide you with information about our new products and services. We may also share information with third parties for their own marketing purposes, which are subject to the separate privacy policies of such third parties. We will do this on the basis of your consent, where required by law, and if not required by law on the basis of our legitimate interests in sharing data with our partners so that we can help you see offers and services which are most relevant to you.

You may opt out at any time if you no longer wish to receive commercial messages from us. You can make this request by contacting our Privacy Officer (details below).

6. Your rights with regards to your personal information

To exercise your privacy rights please send your request in writing. We may be required to verify your identity for security purposes. Your rights are outlined below:

- The right to access information we hold about you, why we have that information, who has access to the information and where we obtained the information from.
- The right to correct and update the information we hold about you. If the data we hold about you is out of date, incomplete or incorrect you can inform us and your data will be updated.
- The right to have your information erased. If you feel we should no longer be using your data you can request that we erase the data that we hold. Upon receiving a request for erasure we will confirm whether it has been deleted or a reason why it cannot be deleted (for example because we have a legal obligation to keep the information or we need it for a legitimate business interest)
- The right to object to processing of your data. You may request that we stop processing information about you. Upon receiving your request we will contact you and let you know if we are able to comply or if we have legitimate grounds to continue to process your data. Even after you exercise your right to object, we may continue to hold your data to comply with your other rights or bring or defend legal claims.

- The right to data portability. You have the right to request that we transfer your data to another controller.
- The right to request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data: (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.
- The right to withdraw consent at any time where we are relying on consent to process your personal data.

We will comply with your request where it is feasible to do so, within 30 days of receiving your request. There are no fees or charges for the first request. However additional requests for the same data may be subject to an administrative fee of £25 per request.

To exercise your rights please do so by writing to:

Paul Hecker
Colchester Global Investors Limited
Heathcoat House
20 Savile Row
London W1S 3PR

Or e-mail phecker@colchesterglobal.com

7. International transfers of personal information

Colchester is committed to being transparent and taking all reasonable and appropriate steps to keeping your personal information secure and to protect it from misuse, loss, or unauthorised access. We do this by having in place a range of appropriate technical and organisational measures.

We are also obliged to tell you where we use services that transfer your information internationally. At Colchester we have a strict selection process when it comes to our suppliers/ service providers and we enforce strict requirements within our contracts to ensure your personal information is stored and transferred in a way which is secure.

As Colchester operates globally, it may also be necessary to transfer your data to other Colchester companies or to suppliers/ service providers where we rely on storage, system and administrative support from outside the European Economic Area* therefore the processing of your data may involve a transfer of data to countries outside of the United Kingdom.

*The European Economic Area (EEA) currently comprises the Member states of the European Union plus Norway, Iceland and Liechtenstein.

We take all reasonable steps to ensure that your personal data is processed securely. We will only transfer personal information outside the EEA where it is compliant with applicable data protection legislation and the means of transfer provides adequate safeguards in relation to your personal information.

We will ensure that all our contracts with international suppliers and service providers will include the current EU Commission approved clauses concerning the protection of the data transferred.

8. Resolving personal information concerns

At Colchester we aim to ensure all information collected about you is done so fairly and lawfully, whilst implementing robust measures to keep your information secure. If you are not satisfied with the information provided in this notice, please contact us in the first instance so we can resolve your queries or provide you with any additional information required.

Alternatively, it is your right to contact your local Data Protection Authority and lodge a complaint. In the UK, the lead Data Protection Authority is the Information Commissioner. For more information please visit the Information Commissioner's office at www.ico.org.uk/concerns, call them on 0303 123 1113, or write to them at Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire. SK9 5AF.

If you have any queries in relation to this notice, or need more information please do not hesitate to contact us at:

Paul Hecker
Colchester Global Investors Limited
Heathcoat House
20 Savile Row
London W1S 3PR

Or e-mail phecker@colchesterglobal.com

9. Consent

Where we need your consent to hold your information we will ask you to confirm your consent in writing and we will inform you why we are collecting the information, how we will use it, how long we keep it for, who else will have access to it and what your rights are as a data subject. Where we do rely on consent you have the right to change your mind and withdraw that consent at any time by writing to us. If you withdraw your consent we will immediately cease using any personal information obtained and processed under that consent unless we have some other legal obligation to continue to use it.

10. How long will we keep your personal information

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for.

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. For example, financial and statutory reporting requirements mean we must keep certain records for a period of 8 years.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

11. Changes

We reserve the right to change the terms of this Privacy Policy from time to time, without notice to you. An up-to-date copy of our Privacy Policy is available on our Website.

The last update to this document was May 2019.