Colchester®
GLOBAL INVESTORS

Privacy Notice

October 2026

As a 'Data Controller' under the UK GDPR and Data Protection Act 2018, and equivalent laws in the other jurisdictions where we operate, Colchester[1] is committed to maintaining the confidentiality, integrity and security of personal information provided by current, past and prospective clients, other individuals connected to our business such as website visitors, event attendees etc, and individuals at our suppliers and business partners. Colchester 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 websites, utilise our services, make enquiries or send other communications, apply for employment 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, or any of our other websites (please also refer to our Cookie Policy located on our websites);
(b) when you complete and submit account opening documentation 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 online 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;
(k) when applying for employment at Colchester;
(l) through CCTV footage taken for safety and security purposes, should you visit our London offices in person; and
(m) 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.

In the event that 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 section 6 of this privacy notice.

[1] Colchester Global Investors Limited ("CGIL"), Colchester Global Investors Middle East Limited ("CGIM"), Colchester Global Investors (Singapore) Pte. Ltd ("CGIS"), Colchester Global Investors (Dublin) Management Limited ("CGIE") and Colchester Global Investors, Inc. ("CGII"), (CGIL, CGIS, CGIM, CGIE and CGII together form "Colchester")

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) Client due diligence information, including identity documents, proof of address, source of wealth and funds;

e) Technical information, including your IP address and how you use our websites, collected through cookies and similar technologies;

f) Recordings of telephone calls and electronic communications, where applicable;

g) CCTV images, if you visit our London offices;

h) Special category data relating to your health, race or ethnicity, to provide you with the necessary support when attending our events and/or sites (with your explicit consent); and

i) 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 service 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 internal systems, or 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, equipment and information storage facilities so as to prevent any loss, misuse, unauthorised access, disclosure, or modification of personal information. This also applies to the 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. Access to CCTV footage is strictly limited to authorised managers and will only be shared with third parties where necessary and lawful.

Colchester's employees may only remove personal information from the office in certain limited circumstances. In all cases this requires the prior permission of authorised management, and employees are required to apply the same level of security over such personal information as they would in Colchester's offices.

We have procedures in place 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

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 of receiving marketing communications at any time, if you no longer wish to receive commercial messages from us. You can make this request by contacting either your usual Colchester contact or by contacting our Privacy Officer in the UK directly (details below under Section 6 of this Privacy Notice).

6. Your rights with regards to your personal information

To exercise your privacy rights please contact us using the details set out below. You can make a request by any means, and you do not have to put it 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 provide 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 cease 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. You have an absolute right to object to direct marketing. Even after you exercise your right to object, we may continue to hold your data to comply with your other rights or to bring or defend any 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 it is required 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 continue to use it.
- The right to withdraw consent at any time where we are relying on consent to process your personal data.
- The right not to be subject to solely automated decisions that have legal or similarly significant effects. We do not make such decisions about you.

We will comply with your request where it is feasible to do so. We will respond within one month of receiving your request, or of receiving what we need to verify your identity or understand your request if that is later.

Should you exercise your right to access information we hold about you, we can extend this period by up to two further months if your request is complex, and we will tell you within the first month if we intend to use this extended period. There is no fee for the processing of such requests, but we may charge a reasonable fee, or refuse to administer the request, if a request is manifestly unfounded or excessive.

To exercise your rights please do so by contacting:

Privacy Officer
Colchester Global Investors Limited
5th Floor
130 Wood Street
London EC2V 6DL

Tel. (+44) 207 292 6920

Or e-mail compliance@colchesterglobal.com

7. International transfers of personal information

Colchester is committed to being transparent and taking all reasonable and appropriate steps to keep 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 where we anticipate that your personal data will be transferred internationally, 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 internationally between Colchester offices, or to suppliers/service providers in other jurisdictions where we rely on storage, system and administrative support.

We take all reasonable steps to ensure that your personal data is processed securely. We will only transfer personal information internationally 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 regulator-approved clauses concerning the protection of the data transferred where personal data is, or it is anticipated will be, transferred. You can request details of the relevant safeguards using the contact details in this Privacy Notice.

8. Resolving personal information concerns and complaints

At Colchester, we aim to ensure all information collected about you is processed fairly and lawfully, whilst implementing robust measures to keep your information secure. If you believe that we have not complied with your data protection rights, or otherwise wish to make a complaint in respect of Colchester's processing of your personal information (including our response to a subject access request), please contact us in the first instance using the contact details noted in this Privacy Notice. We will acknowledge your complaint within a maximum of 30 days, and will ensure that your complaint is handled promptly, effectively and impartially.

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. Contact details of Data Protection authorities in other jurisdictions are available upon request. You may complain to the relevant Data Protection authority whether or not you have complained to us first.

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

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Colchester Global Investors Limited
5th Floor
130 Wood Street
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Tel. (+44) 207 292 6920

Or e-mail compliance@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 will 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.

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 Notice from time to time, without further notification to you. An up-to-date copy of our Privacy Notice is available on our Websites.

The last update to this document was October 2026.