

## **PRIVACY POLICY**

Your trust is very important to us and we provide the following to explain our privacy policies with regard to your information.

This statement sets out how we are committed to protecting the privacy and security of your personal data (“personal information”). This notice gives individuals information on how their personal information (i.e. information which directly or indirectly identifies you) is processed.

This statement also sets out why we use your personal information (as a controller) and how you may contact us in relation to the use of your personal information.

We conduct the firm’s business in accordance with the highest ethical standards, respecting the firm’s customers, suppliers, and other business counterparties, dealing responsibly with the firm’s and clients’ assets, and complying with applicable legal and regulatory requirements.

We reserve the right to make changes to this Privacy Policy at any time. If you want to ensure that you are up to date with the latest changes, we suggest that you visit this page frequently.

### **COLLECTING YOUR PERSONAL INFORMATION**

We may collect certain personal information with respect to institutional clients, other business relationships and employees/applicants, including by way of example:

- Name and contact details
- Tax information
- Nationality, passport or other identification documents
- Details of role responsibilities
- Information on investigations, litigation, court proceedings, civil liabilities or criminal convictions against you
- Employee information required for HR purposes (including payroll, job history) and
- Where permitted, information received from credit reference agencies, fraud prevention agencies and from other public sources.

### **HOW WE WILL USE YOUR PERSONAL INFORMATION**

We will use your personal information for:

- The provision of products and/or services to our investors,
- Managing business relationships with you,
- Archiving documents (electronic and paper based),
- Detecting and preventing fraud and/or money laundering,
- Statistical analysis and assessment,
- Job applicants, employee and training records,
- Communicating with you, and
- Otherwise as is necessary to comply with applicable laws, regulations and/or codes of practice.

The provision of personal information by you may be necessary in order for us and third parties (to which personal information may be disclosed) to provide you with the requested services, for the performance of any contractual relationship with you and for the other purposes as described in this notice.

We also give you the opportunity to remove your name from our contact lists, if you desire to do so. Please review the corresponding section of this Privacy Policy below. We, through members of our marketing team, may send you e-mails announcing news about our organization, event information and other relevant information related to our company from time to time. Additionally, we'll only send you e-mails that you have agreed to receive by submitting your information on this Website and you can opt out at any time.

## **HOW WE DISCLOSE YOUR PERSONAL INFORMATION**

We may disclose certain personal information:

- To us and our affiliates and subsidiaries,
- To courts, governmental and non-governmental regulators, including tax authorities,
- To law enforcement agencies or as otherwise required under law or regulation,
- To any third party that acquires, or is interested in acquiring, all or part of our assets or projects, or that succeeds us in carrying on all or a part of its business, whether by merger, acquisition, reorganization or otherwise,
- To credit reference agencies who may use it to perform credit reporting and affordability checks for us and to verify your identity (e.g. age and residence), and to prevent and detect criminal activity, fraud, and money laundering,
- To fraud prevention agencies who will use it to prevent fraud and money-laundering and to verify your identity, and
- To our agents, advisers or outsource providers in order to provide agreed products or services.

## **SECURITY AND DATA RETENTION**

We strive to maintain the reliability, accuracy, and completeness of all personal information it holds to protect privacy and security at all times. The security measures in place on our websites and computer systems aim to prevent the loss or misuse of the information we hold.

We update and test our security and technology on an ongoing basis. Access to personal information is restricted to those employees responsible for providing benefits or services to you. Our employees are regularly trained on the importance of confidentiality and keeping your information is kept private and secure.

Subject at all times to applicable laws, we will retain your personal information for a period of up to seven (7) years from the end of the relationship.

## **MONITORING**

We reserve the right to monitor, restrict, delay, intercept, and/or record your communication with us. All types of communication such as mails, voicemails, telephone calls, or emails can be monitored to comply with regulatory obligations. We may reject, restrict, delay, or remove communications which may disrupt our system or pose a security risk. Offensive, unwanted content or spam will be filtered out or destroyed.

## **HTTP COOKIES IN USE ON THIS SITE**

Our website uses cookies to help provide you with the best experience we can. Cookies are small data files that are stored in your internet browser when you browse websites.

Our cookies help us:

- Make our website work as you'd expect,
- Improve the speed/security of the site,
- Continuously improve our website for you,
- Make our marketing more efficient,

We do not use cookies to:

- Collect any personally identifiable information (without your express permission),
- Collect any sensitive information (without your express permission),
- Pass data to advertising networks,
- Pass personally identifiable data to third parties,
- Pay sales commissions.

## **GRANTING US PERMISSION TO USE COOKIES**

If the settings on your software that you are using to view this website (your browser) are adjusted to accept cookies we take this, and your continued use of our website, to mean that you are fine with this. Should you wish to remove or not use cookies from our site you can learn how to do this below, however doing so will likely mean that our site will not work as you would expect.

## **MORE ABOUT OUR COOKIES**

Our own cookies

We use cookies to improve the user experience of the website by building up anonymous data profiles that enable us to understand user journeys and behavior across the our website.

There is no way to prevent these cookies being set other than to not use our site.

Anonymous Visitor Statistics Cookies

We use cookies to compile visitor statistics such as how many people have visited our website, what type of technology they are using (e.g. Mac or Windows which helps to identify when our site isn't working as it should for particular technologies), how long they spend on the site, what page they look at etc. This helps us to continuously improve our website. These so-called "analytics" programs also tell us if, on an anonymous basis, how people reached this site (e.g. from a search engine) and whether they have been here before, helping us to put more money into developing our services for you instead of marketing spend.

You can read Google's Privacy Policy here: <https://policies.google.com/privacy>

## **TURNING COOKIES OFF**

You can usually switch cookies off by adjusting your browser settings to stop it from accepting cookies. Doing so however, will likely limit the functionality of our and a large proportion of the world's websites as cookies are a standard part of most modern websites.

We may revise and/or supplement our privacy notice from time to time to reflect (including but not limited to), any changes in our business, law, regulation, markets and/

or the introduction of any new technology.

### **LINKS TO OUTSIDE SITES**

This Website links to other websites and also links to documents located on Websites maintained by other organizations or individuals. Once you access a link to another Website, please be aware that we are not responsible for the privacy practices or the content of such Websites and only responsible for the privacy practices while you are engaged on our Website.

### **REMOVAL FROM OUR MAILING LIST**

We give you the opportunity to remove your name from our postal and e-mailing list so that you do not receive any future communications. If you desire to permanently remove your name, you can contact us to do so, or opt out from an email received. If you determine that our information about you is inaccurate or it has changed, you may also modify information by contacting us. If you have comments or questions about our online Privacy Policy, or would like more information about us, or are experiencing technical trouble, please contact us.

### **CHILDREN UNDER THE AGE OF 13**

This website is not directed to, and does not intend knowingly to collect personal identifiable information from children under the age of thirteen (13). If it is determined that such information has been inadvertently collected for any reason, we will take immediate and necessary steps to ensure that such information is deleted from our system's database. Anyone under the age of thirteen (13) must seek and obtain parent or guardian permission before using this Website.

### **NOTICE TO EUROPEAN UNION USERS**

Our operations are primarily based in the United States. If you provide information to us, the information will be transferred out of the European Union (EU) and sent to the United States (the adequacy decision on EU-US Privacy became operational on August 1, 2016. This framework protects the fundamental rights of anyone in the EU whose personal data is transferred to the United States for commercial purposes. It allows the free transfer of data to companies that are certified in the US under the Privacy Shield). By providing personal information to us, you are consenting to its storage and use as described in the Privacy Policy.

### **ACCEPTANCE OF TERMS**

By using this website, you are hereby accepting the terms and conditions stipulated within this Privacy Policy agreement. If you are not in agreement with our terms and conditions, then you should refrain from further use of our Websites. In addition, your continued use of our Website following the posting of any updates or changes to our terms and conditions shall mean that you agree and accept such changes.

**INQUIRIES, REQUESTS OR CONCERNS**

Please contact us if you have any questions or comments about this privacy policy or would like to receive more information about us.