

Privacy Policy

The scope and purpose of this Privacy Notice

This Privacy Notice explains how Alquity (“Alquity”, “we”, “us”, “our”), collects, uses, shares and otherwise processes your Personal Data in connection with your relationship with us as an Alquity client, acting for a client or being generally interested in our services and our publications in accordance with applicable data privacy laws and the General Data Protection Regulation (“GDPR”) which will become applicable as of 25 May 2018.

Should you have any questions about this Privacy Notice you can contact us at complianceofficer@alquity.com or at the address mentioned below.

We may provide supplemental privacy notices on specific occasions when we are collecting or processing Personal Data about you so that you are fully aware of how and why we are using your Personal Data. Those supplemental notices should be read together with this Privacy Notice.

Alquity

Alquity globally is made up of different legal entities registered in different jurisdictions some of which are limited liability entities. This privacy notice is issued on behalf of all Alquity entities and entities in the related groups, and to the extent we are a data controller, each of our entities is a joint data controller of your Personal Data. A full list of Alquity entities and related groups is available upon request.

You can contact us at Alquity Investment Management Limited, 3 Waterhouse Square, 138-142 Holborn EC1N 2SW, United Kingdom or on complianceofficer@alquity.com.

Personal Data

The term “**Personal Data**” as used in this Privacy Notice means any information relating to you such as your name, contact details, bank account details etc. Personal Data does not include data from which you can no longer be identified such as anonymised aggregate data.

What information do we collect about you, how do we collect it and what do we use it for?

The kinds of Personal Data we may collect include your contact details (such as your address, email address and telephone number) and information such as your job title which we will request from you. In addition, we collect the Personal Data you choose to provide to us, e.g. if

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you contact us by letter, telephone, email or any other means of electronic or personal communication. We will process your Personal Data if and to the extent applicable law provides a lawful basis for us to do so. We will therefore process your Personal Data only:

- a) if you have consented to us doing so;
- b) if we need it to perform the contract we have entered into with you;
- c) if we need it to comply with a legal obligation; or
- d) if we (or a third party) have a legitimate interest which is not overridden by your interests or fundamental rights and freedoms.

Please note that we may use or disclose Personal Data if we are required by law to do so or if we reasonably believe that use or disclosure is necessary to protect our rights and/or to comply with judicial or regulatory proceedings, a court order or other legal process.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access Personal Data (or to exercise any of your other rights). This is another appropriate security measure to ensure that Personal Data is not disclosed to any person who has no right to receive it.

Accuracy of information

It is important that the Personal Data we hold about you is accurate and current. Please let us know if your Personal Data changes during your relationship with us.

What if you do not provide the personal data we request?

It is in your sole discretion to provide Personal Data to us. If you do not provide us with all or some of the Personal Data we request, we may not be able to accept an engagement from you, to provide all or some of our legal services, to enter into a contract with you or to send you the requested (marketing) information.

Change of purpose, anonymisation

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We will only use your Personal Data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason which is compatible with the original purpose. If we need to use your Personal Data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

In some circumstances we may anonymise your Personal Data so that it can no longer be associated with you, in which case it is no longer Personal Data.

With whom will we share your information?

When using your Personal Data for the purposes and on the legal basis described above we may share your Personal Data with our other Alquity offices around the world as well as services providers we work with. We may also have to share your Personal Data with regulators, public institutions, or other third parties.

For the purposes described above we may have to transfer your Personal Data from the European Economic Area (EEA) to a Alquity office or a third party outside of the EEA and in a jurisdiction not being subject to an adequacy decision of the European Commission. We will always ensure that there is a legal basis and a relevant safeguard method for such data transfer so that your Personal Data is treated in a manner that is consistent with, and respects the EU laws and other applicable laws and regulations on data protection.

Your rights in relation to your information

You have rights as an individual which you can exercise under certain circumstances in relation to your Personal Data that we hold. These rights are to:

- request **access** to your Personal Data (commonly known as a “data subject access request”) and request certain information in relation to its processing;
- request **rectification** of your Personal Data;
- request the **erasure** of your Personal Data;
- request the **restriction** of processing of your Personal Data;
- **object** to the processing of your Personal Data.

If you want to exercise one of these rights please contact us at complianceofficer@alquity.com.

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You also have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues, or, as the case may be, any other competent supervisory authority of an EU member state.

Right to withdraw consent

In case you have provided your consent to the collection, processing and transfer of your Personal Data, you have the right to fully or partly withdraw your consent. To withdraw your consent, please contact complianceofficer@alquity.com. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose(s) to which you originally consented unless there are compelling legitimate grounds for further processing which override your interests, rights and freedoms or for the establishment, exercise or defence of legal claims. In case we processed your Personal Data for direct marketing purposes, you have the right to object at any time, in which case we will no longer process your Personal Data for such marketing purposes.

How long will we retain your information?

We will only retain your Personal Data for as long as necessary to fulfil the purposes for which it was collected and processed, including for the purposes of satisfying any legal, regulatory, accounting or reporting requirements.

To determine the appropriate retention period for your Personal Data, we will 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, in which case it is no longer Personal Data.

Upon expiry of the applicable retention period we will securely destroy your Personal Data in accordance with applicable laws and regulations.

Fees

You will in general not have to pay a fee to exercise any of your individual rights mentioned in this Privacy Notice. However, we may charge a reasonable fee if your request to exercise your individual rights is

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manifestly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

Changes to this privacy notice

We reserve the right to update this privacy notice at any time, and we will make an updated copy of such privacy notice available on our website.

Further information

If you have any concerns or require any further information, please do not hesitate to contact complianceofficer@alquity.com