

PRIVACY NOTICE

Cambridge International (UK) LLP (“CIUK”) is committed to protecting personal data. To the extent that the European General Data Protection Regulations (“GDPR”) applies, this privacy notice will inform you as to how we may collect, process, and/or disclose certain types of personal data in connection with services we may provide you in the course of operating our business and certain rights and options that you have in this respect.

This Privacy Notice is addressed to individuals outside of our organization with whom we interact; including visitors to our website, clients and prospective clients, contacts at firms we deal with in a non-client capacity, suppliers, visitors to our offices, and applies to personal data provided directly to us by individuals and to personal data provided to us by companies and other organizations.

For the purposes of data protection law, CIUK is the data controller and responsible for your personal data.

THE DATA WE COLLECT ABOUT YOU

Personal data, or 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).

In order to provide you with our services and any other business-related activities we may collect, use, store and transfer personal data about you. This data may include the following:

- Identity data (eg. name, passport number, nationality, date of birth, gender)
- Contact data (eg. postal address, email address, telephone number)
- Usage data (eg. information about how you use our products and services, interactions, calls, meetings, contact history, emails); and
- Transaction Data (eg. information about past transactions and trading activity)

We do not collect any special categories of personal data about you (this includes details about your race or ethnicity, health, political opinions, religious or philosophical beliefs, or data relating to criminal convictions or offences) unless it is required through a legal obligation.

Where we need to collect personal data by law or under the terms of a contract we have with you

and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into you (for example to provide you with our services).

HOW IS YOUR PERSONAL DATA COLLECTED?

The data may be provided by you directly or may be obtained by us from third parties or other public sources, including third-party agencies such as credit reference agencies, fraud prevention agencies, law enforcement agencies, public databases, registers and records, such as Companies House and the FCA Register, and other publicly available sources. We may collect information from independent financial advisors, other professional advisers, product providers, event organizers, and other agents and/or representatives, and we seek information from sanctions checking and background screening providers.

We may also collect your data where your employer provides us with information about you, where your contact details are provided by one of our other clients or where you may be a prospective or existing client.

HOW WE USE YOUR PERSONAL DATA AND THE PURPOSE

We will only use your personal data when the law allows us to. Most commonly, we will use it in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you
- Where it is necessary for our legitimate interests (or those of one or more of our affiliates) and where your fundamental rights do not override those interests
- Where we need to comply with legal and/or regulatory obligations which we have to discharge

Generally, we do not rely on consent as a legal basis for processing your personal data, and we will only process your personal data based on a lawful ground depending on the specific purpose for which we are using your data. Some examples of our purposes are:

- To be able to arrange or enter into transactions with you for our products and services
- To be able to contact and interact with you or market our product and services to you as well as informing you of any changes to our service
- To be able to carry out our legal and regulatory compliance obligations, and to prevent the provision of financial and other services to persons who may be subject to economic or trade

sanctions on an ongoing basis, in accordance with our anti-money laundering procedures and those of our affiliates

- To be able to monitor and record calls and e-mails to comply with our legal and regulatory obligations and ensure compliance with our policies and standards
- To be able to enter into agreements with you as a vendor or supplier

CHANGE OF PURPOSE

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 and that reason 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.

DISCLOSURES OF YOUR PERSONAL DATA

In order to fulfill the above-mentioned purposes we may have to share your personal data with internal or external third parties. Internal parties will include our affiliate companies, including those located in the United States. External parties will include companies that perform certain activities and services for and on our behalf and/or on the behalf of any of our affiliates, so that we can perform the contract and/or business activity with you. External parties can also include companies providing services for money laundering and terrorist financing checks and other fraud and crime prevention purposes and companies providing similar services; courts, law enforcement authorities, regulators, governmental officials, and other bodies as required by law or as requested; and potential purchasers of the whole or part of our business or on any merger or group reorganization.

We will take steps to ensure that any third parties respect the security of your personal data and treat it in accordance with the law. We do not permit our third parties to use your personal data for their own purposes and we only permit them to process your personal data for the specified purposes and in accordance with the law.

INTERNATIONAL TRANSFERS

We may share your personal data within the Cambridge Group and with other external third parties as mentioned above. This will involve transferring your data outside the European Economic Area (“EEA”). It may also be processed by staff operating outside of the EEA who work for our affiliates or for one of our suppliers.

Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission
- Where we use certain service providers, we may use specific contracts approved by the European Commission
- Where we use providers based in the US, we may transfer data to them if they are part of the EU-US Privacy Shield which requires them to provide similar protection to personal data shared between Europe and the US

In other circumstances, the law may permit us to otherwise transfer your personal data outside the EEA. In all cases, however, we will ensure that any transfer of your personal data is compliant with data protection law.

DATA RETENTION - HOW LONG WILL YOU USE MY PERSONAL DATA FOR ?

We will only retain your personal data for as long as is necessary to fulfil the purposes we collected it for and for the purposes of satisfying any legal, accounting, regulatory or reporting requirements. By law we have to keep information about our clients, service providers and other relevant entities for a certain period of time after the end of the contractual and/or business relationship.

DATA SECURITY

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used, or accessed in an unauthorized way, altered, or disclosed. In addition we limit access to your personal data to those employees, agents, contractors and other third parties

who have a business need to know. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality.

YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data:

- You can obtain information relating to the processing of your personal data and a copy of such data
- Where you consider that your personal data is inaccurate or incomplete you can require such personal data to be modified accordingly
- You can require the deletion of your personal data to the extent permitted by law. Please note that there may be circumstances where you ask us to erase your personal data, but we are legally entitled to or required to retain it
- You can request the restriction of the processing of your personal data
- Where you have given consent for the processing of your personal data you have the right to withdraw your consent at any time. Please note that we may still be entitled to process your personal data if we have another legitimate reason (other than consent) for doing so

Should you wish to assert any of the rights set out above, or if you have any questions about this privacy notice, please contact us using the contact details on our website.

CHANGES TO OUR PRIVACY NOTICE

We reserve the right to update and amend this Privacy Notice from time to time in order to reflect any changes to the way in which we process your personal data or changing legal requirements. Any changes we may make to our Privacy Notice in the future will be posted on our website, and we invite you to check back frequently to see any updates or changes to our Privacy Notice.

Cambridge International (UK) LLP

<http://www.cambridgeintl.com/europe>