

Introduction

The European Data Protection laws changed on 25 May 2018 with the implementation of the General Data Protection Regulation ("GDPR"). We have updated our privacy statement to support the changes to data protection laws.

Courtiers Asset Management Limited provides financial products and services to companies and institutions. This document will explain how we collect, use and disclose personal data about individuals with whom we come into contact in the course of our dealings with such clients and other associated persons. This includes companies and its employees, service providers and other business counterparties, referred to as "Your Company" in this document.

Who is collecting your personal data and how can you contact us?

Your personal information is held by Courtiers Asset Management Limited ("CAML") which is part of Courtiers Group Holdings Limited. Courtiers Group Holdings Limited also includes the regulated entity Courtiers Investment Services Limited and the unregulated entity Courtiers Support Services Limited collectively referred to as ("Courtiers Group").

If you have any questions about this privacy statement or information we hold about you, please contact us:

- Full name of legal entity: Courtiers Asset Management Limited
- Contact: Compliance Officer
- Email address: enquiries@courtiers.co.uk
- Registered Address: 18 Hart Street, Henley-on-Thames, Oxfordshire, RG9 2AU

What the data protection law says

We take the privacy of our clients seriously and only collect and use personal information when it is necessary, fair and lawful to do so.

CAML can only use your personal information if we have a lawful reason to do so. GDPR provides 6 reasons under which we can use your personal data:

- When you have consented to us processing your personal information for a specific purpose.
- When it is necessary to provide the product or service requested.
- When it is our legal duty to do so, e.g. keeping records of transactions to comply with financial laws.
- When it is in your vital interest.
- When it is necessary for us to perform a task in the public interest.
- When it is in the legitimate interest of CAML or of a third party to do so, e.g. sending relevant communications about performance data.

What personal information we collect and why?

We will collect, store and process personal data which is provided to us directly by you, obtained from your use of our systems, communications or other dealings with you and/or Your Company. Your Company may also provide us with some personal data about you. This may include but is not limited to:

- Information about who you are, your office address, email address and telephone number;
- Your title and job description;
- Business ownership structure including directorship information;
- Authorised Signatory lists;
- Information or background checks for anti-money laundering/due diligence purposes;
- Business contact details from third parties, including your agents and service providers e.g. EMT data vendors;
- Information from publicly available sources such as the Financial Conduct Authority (FCA) and Companies House;
- Personal information generated in connection to products or services to CAML, such as fund data updates, trading and market infrastructure providers;
- Information about your contact with us, including details of meetings with Investment Manager(s), correspondence and telephone calls;
- Information that is collected automatically via cookies when you visit our website. Further information about this can be found in our Privacy Policy and Cookie Policy published on our website.

We are considered to be “controllers” of your personal data. This means we determine the purposes and means of processing your personal data.

How will we use your personal data?

We collect your personal data, as necessary to pursue our legitimate business and other interests, for the following reasons:

- To provide investment management services in connection with our dealings with Your Company;
- To manage the CAML funds and determine if you may invest or continue to invest in our funds;
- Certain personalised service or communications may be required for example the provision of fund performance data;
- To prospective clients to enable our products to be available to you or your clients;
- Some personal information is also necessary to enable CAML to comply with compliance reporting and audit, managing risk, industry standards, regulatory and statutory requirements and other requirements related to fraud prevention and anti-money laundering;
- To communicate with our professional service providers as part of our outsourcing services;
- To investigate and respond to incidents relating to our business and to train our employees to deal with incidents;
- Your personal data may also be used by CAML for research and analytical purposes.

If you do not wish us to collect and use your personal information in these ways, it may mean that we are unable to provide you with our products or services.

How long do we keep your personal data for?

We retain personal data on our systems for as long as is necessary to provide the agreed service or products.

The length of time that personal information will be retained will vary depending on the legal or regulatory obligations that CAML needs to meet.

Information that is no longer needed is destroyed securely or anonymised (i.e. can no longer be identified as being your personal data).

Personal data is stored in line with legal and regulatory guidelines, this includes the requirement to record all telephone calls relating to instructions regarding transactions.

In relation to marketing information, we will remove your data from our marketing database if you are no longer a current client of CAML.

Telephone Recording

Due to provisions in the revised Markets in Financial Instruments Directive (MiFID II) and Regulation (MiFIR), CAML is required to keep a record of communications of any instructions regarding transactions. Such records should include the recording of telephone conversations or electronic communications relating to transactions and the provision of services that relate to the reception, transmission and execution of orders.

Our telephone system is provided by Gamma for recording calls made on both desktop and mobile telephones. All calls made to or by the Investment Manager are recorded through this telephone system.

Telephone numbers are held on a central directory in order for the Gamma software to identify which client the call should be recorded against. This will allow the retrieval of calls for as long as those call records are retained.

Who do we share your personal data with?

We will share some personal data when required to do so in order to provide our service(s) to you or Your Company, however we do not transmit any personal information to third party marketers.

We may share your personal information with:

- Your Company in connection with the products and services that we provide to it;
- To other entities within the Courtiers Group for the purpose of managing our clients and service providers;
- Companies we have chosen to support us in the delivery of the products and services we provide, such as our Information Technology or financial subscriptions provider;
- To our professional service providers (e.g. depositary, fund accountants, auditors and consultants) to the extent necessary to enable them to perform their duties;
- Companies we approach to obtain or publish fund data associated with the products and services we provide;
- Our regulators and supervisory authorities, e.g. the FCA, the Information Commissioner's Office (ICO), the London Stock Exchange or any other regulatory or enforcement body (either in the UK or elsewhere);
- Law enforcement and credit agencies for the prevention and detection of crime or where specifically instructed to do so by law, regulation or court order;
- Companies who require the information in order to provide CAML or Courtiers Group with legal advice and/or assistance in enforcing the terms of business.

We never sell personal data to any third party. Whenever we share information, we do so in line with our obligations to keep that information safe and secure.

Your rights over your personal data

You have rights as an individual which you can exercise in relation to the information we hold about you. Those rights include:

- Right to be informed – you have a right to receive clear and easy to understand information on what personal information we hold, why and who we share it with. This information is provided in this privacy statement and in our terms and conditions;
- Right of access – you can ask us for a copy of the information we hold about you. This is done by making a subject access request in writing to our registered office;
- Right to request rectification – you can ask us to correct your personal data if it is inaccurate or incomplete;
- Right to request erasure – you can ask for your information to be deleted or removed, unless we are required to retain the data for overriding legal, regulatory or contractual purposes;
- Right to restrict processing – you can ask that we stop processing your personal information if you are concerned about the accuracy of the information or if you believe we are not doing so lawfully. This allows CAML to keep the information but only to ensure that it is not used in the future for those reasons restricted by you;
- Right to data portability – you can ask for a copy of your personal data in electronic format. We can copy or transfer that data to another data controller in a safe and secure way;
- Right to object – you can object to us processing your personal information in certain circumstances - if the processing is done for our legitimate interests (including profiling), for direct marketing (including profiling) or if we were using that information for scientific/historical research and statistics;
- Rights related to automatic decision making including profiling – you have the right to ask CAML to: provide information about any processing involving automatic decision making or profiling involving your personal information; request human intervention or challenge a decision where processing is done solely by automated processing; and, carry out regular checks to make sure our automated decision making and profiling processes are working as they should.

If you would like to exercise any of the rights listed above, please contact us at the address listed at the top of this privacy statement.

Time limit and fee: We will respond to all legitimate requests within 30 days. Occasionally it may take us longer than 30 days if your request is complex or you have made a number of requests. In this case, we will keep you informed. Your personal information will be provided in a structured format and free of charge.

Information you may need to provide: we may request confirmation of your identity to ensure that your personal data is not disclosed to any person who has no right to receive it. We may also contact you to request further information to ensure your request is dealt with promptly.

How personal information is protected

We take information and system security very seriously. Any personal information which is collected, recorded and processed by CAML in any way, whether paper copies or digital copies, will be treated in confidence and will have appropriate safeguards in line with our obligations under GDPR in order to protect that information against any unauthorised or accidental disclosure, access or deletion.

CAML will take appropriate technical and organisational measures to manage risk to the confidentiality, integrity and availability of your personal data.

Where information is processed

The majority of personal information is processed within the UK and European Economic Area (EEA).

However, some information may be processed by the third parties we work with outside of the EEA, including companies in the Isle of Man or the United States.

When information is being processed outside of the EEA, we ensure that any legal agreements with those third party suppliers provide at least an equivalent level as would be applied by UK / EEA data privacy laws. CAML will abide by all applicable data protection legislation.

Changes to our privacy policy

This privacy notice will apply from 25 May 2018. We keep our privacy policy under review, if we amend it, we will keep you informed of the way we process your personal data and related matters.

Your right to complain

We strive to collect, use and safeguard your personal data in line with current data protection laws. If you believe that your information has been mishandled, you should contact our Compliance Officer at CAML's registered office, listed at the top of this document, so that your complaint can be fully investigated.

If you are not satisfied with our response or you still have a complaint about our use of your information, you can contact the Information Commissioner's Office via their website at www.ico.org.uk/concerns or write to them at:

Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.



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