

Privacy Policy

Please read this privacy policy as it describes how we intend to collect, use, store, share, and safeguard your information.

Carvetian Capital Management Limited ("Carvetian") is committed to protecting the privacy and security of personal information entrusted to us.

This privacy notice is intended for individuals who:

1. invest directly with us through our funds; and/or
2. request information from us, in a personal capacity, in relation to our products and services.

This notice describes how we as a "Data Controller", collect and use personal information about you during and after your relationship with us, in accordance with the General Data Protection Regulation ("GDPR"). It applies to all processing of personal data of our individual investors or marketing recipients that we undertake, and supplements any other similar notices or information provided to you at the time you supplied your personal data.

The kind of information we hold about you

We may collect, store, and use the following categories of personal information about you:

- personal details such as name, title, date of birth, addresses, telephone numbers and email addresses;
- identification and verification information and documents, such as signatures, passports, driving licences, birth/marriage certificates and tax/credit references; and
- financial and transactional information relating to your investments and your instructions regarding these.

We may also in some circumstances record telephone conversations with you. If you provide us with additional information about you, in particular by telephone or email, we may for regulatory reasons be required to collect and store the record as a whole. This might include:

- information about your date and place of birth, nationality, tax residency, tax references etc., race or ethnicity, religious beliefs, sexual orientation, marital status, and political opinions; or
- information about your health, including any medical condition.

We ask that you do not disclose any such information to us if you are uncomfortable for it to be stored on our systems to comply with our regulatory obligations.

How is your personal information collected?

We typically collect personal information about our individual investors, directly from them. We will collect other information about you from third parties in the course of carrying out our anti-money

laundering/anti-fraud obligations. We may also collect additional personal information in the course of our relationship as a necessity of the services being provided.

How we will use information about you

We will only use your personal information when the law allows us to and this is known as a “legal basis” for processing.

Situations in which we will use your personal information

We may use your personal information to:

- administer your investment in accordance with your instructions, the legal basis for this will be in performing a contract we have entered into with you or an associated individual, such as a joint holder, donor or trustee;
- communicate with you to provide information about Carvetian products, services, events, promotions or other intellectual capital, we will only do so where you indicated to us that you wish to receive such information;
- process your identification details in order to comply with our anti-financial crime obligations;
- check your identification details against databases of individuals who are subject to sanctions, classified as “politically exposed persons” or have committed crimes and following up any suspicions, in order to ensure that we comply with our anti-money laundering and counter terrorist financing obligations and to avoid fraud itself; and
- meet our other compliance and regulatory duties, for example to retain certain records.

We may also use your personal information where we need to protect your interests or someone else's interests (such as a minor who is the beneficiary of a share plan with us); or where it is needed in the public interest or for official purposes.

There may be overlap in the circumstances in which we use the same information about you.

Change of purpose

We will only use your personal information 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 information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law or regulation.

Data sharing and third party processors

We may need to share your personal data with third parties, including other Business Contacts, other entities within the group and our auditors. Where we share your personal data with another party performing services for us (not for you), we require those third parties to respect the security of your personal data and to treat it in accordance with the law.

Which type of third-party service providers appointed by Carvetian will process your personal information?

We may share your personal information with:

1. a regulator or other authority (such as HMRC) in order to comply with the law;
2. the Administrator of our Funds; and
3. a screening or identity checking service as required by law in order to carry out your instructions in relation to the services we provide to you. This will include anti-money laundering, sanction and PEP status screening.

Carvetian do not use your personal information for any marketing purposes. Should we wish to do so, we would need your express consent for this and you would have the right at any time to amend or cancel your instructions in this regard.

A list of our current third party service providers is provided at the end of this notice.

When might we share your personal information with other entities in the group?

We will share your personal information with other entities in our group only in so far as necessary to provide the products and services you have requested or contracted from us.

Data Security

We have put in place measures to protect the security of your information. Details of these measures are included in group-wide policies which cover the following:

- management and organisation of information security;
- classification of data which includes data handling rules;
- staff training on responsibilities connected to information security and data protection and the reporting of any information security incidents;
- physical and environmental security; and,
- systems security, including backups, virus protection and access controls.

We are committed to implementing, maintaining and continually improving an information security management system to ensure the highest standards. Our approach supports the enhancement of information security controls and our information governance framework is overseen by an appointed Data Protection Officer. We also have a rigorous third party oversight programme designed to maintain the confidentiality, integrity and availability of your data when it is processed by other organisations on our behalf.

Data Retention

How long will we use your information for?

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal or regulatory requirements.

You will appreciate that as a regulated business, there are record retention obligations on us. As a result, where necessary, we will retain your personal data in order to comply with these obligations.

Rights of access, correction, erasure, and restriction

Your rights in connection with personal information

Under certain circumstances, by law you have the right to:

- **Request access** to your personal information. This enables you to receive a copy of the personal information we hold about you and to check that we are processing it lawfully.
- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to stop processing personal information where we are relying on a legitimate interest and there is something about your particular situation which makes you want to object to processing on this ground.
- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your personal information to another party.

You can exercise these rights by contacting us: Data Protection Officer, Carvetian Capital Management Limited, Stuart House, St John's Street, Peterborough PE1 5DD.

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 the information (or to exercise any of your other rights).

Please keep us updated with any change of address, contact details of other information relevant to our business relationship with you.

Right to Withdraw Consent

Where you may have provided your consent to the collection, processing or transfer of your personal information in order to receive marketing material from us, you have the right to withdraw that consent at any time. To do so, please contact us using the details above.

Data Protection Officer

If you have any questions about this privacy notice, please contact compliance@carvetian.com. If you are unhappy with how we handle your personal information, please contact the appointed Data Protection Officer, Carvetian Capital Management Limited, Stuart House, St John's Street, Peterborough PE1 5DD. If we do not resolve your concerns to your satisfaction, you have the right to make a complaint to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.

Changes to this Privacy Notice

We may update this privacy notice from time to time, and will communicate such updates through our website. We will not do so where we believe this would materially impact your rights and freedoms, in those circumstances we will expressly notify you. We may also notify you in other ways from time to time about the processing of your personal information

Third party providers who may currently process your personal data on behalf of Carvetian

Experian - the firm is a data partner of Smartsearch and used to perform identity verification checks on clients for Anti Money Laundering & Financial Crime purposes.

Equifax – another data partner used by Smartsearch to perform identity verification checks on clients for Anti Money Laundering & Financial Crime purposes.

HMRC – Under regulation and legislation we may be required to share data with HMRC as the UK appointed agent for the collection and sharing of tax information.

NatWest TDS – The fund's Depository for the purpose of compliance with our regulatory obligations and to make fund distributions.

RBC Investor Services – Fund Custodian appointed by the Depository responsible for the safe holding of the fund assets.

Smartsearch – the firm used by Carverian to perform identity verification checks on clients for, Anti--Money Laundering, Sanctions and Politically Exposed Persons (PEPs) purposes.

Various appointed Investment Managers – information may be shared for the lawful purpose of operating the funds and the related transactions

Yealand Administration Limited – An associate company appointed as the Third Party Administrator (TPA) for all the funds operated by Carverian, who perform the administration function for the funds.

Please note that the above list is subject to change.