

CAMROSE CAPITAL INVESTMENT PARTNERS LLP

PRIVACY POLICY

Camrose Capital Investment Partners LLP, a limited liability partnership registered in England and Wales with company number OC450608 and registered office 2nd Floor, 21A Kingly Street, Carnaby, London, United Kingdom ("Camrose Capital", "we", "us" or "our") is committed to protecting the privacy of personal data we receive, control and process in accordance with the applicable data protection legislation (as defined below).

In this Privacy Policy we aim to inform you about the types of personal data we collect, the purposes for which we use the data, the ways in which the data is handled and provide you with information on your rights as a data subject. We will only use personal data provided to us in accordance with the UK Data Protection Act 1998 and the UK's retained version of EU General Data Protection Regulation 2016/679, ("UK GDPR") as amended. For the purpose of this Privacy Policy and specifically the UK GDPR, the controller of personal data is Camrose Capital.

Contact

If you have any enquires or if you would like to contact us about our processing of your personal data, including to exercise your rights as outlined below, please contact us as noted below. When you contact us, we may ask you to verify your identity. Contact name: Sarah Jane Maidens, Chief Compliance Officer; Email: s.maidens@camrosecapital.com.

The Information we collect

- *Website Contacts*

We do not actively collect personal data through our website (e.g. through web forms), however if you contact us using the contact information provided we may collect personal data in the course of our correspondence with you such as your personal details, including but not limited to your name and contact details (together with your e-mail address), for example via telephone calls or through correspondence with us.

The website uses technologies which automatically collect data using "cookies" about your device equipment, including your IP address, and website browsing usage. You can set your browser to remove cookies from your browser using the following link [How to Enable and Disable Cookies on Every Web Browser \[Guide\] | All About Cookies](#). We do not share information collected with third parties.

- *Fund Investors*

If you are an investor or a prospective investor, we may hold certain personal data, for example in order to provide fund performance information in accordance with our regulatory obligations, or occasionally we may be provided with personal data about you from third parties such as fund administrators, who are themselves data controllers, for legitimate business purposes.

- *Clients and Prospective Clients*

Camrose Capital collects personal data directly from owners, controllers and key personnel of its separately managed account clients (including Funds) ("Client") for our legitimate business purposes including compliance with anti-money laundering ("AML") legislation and related applicable laws (including name, title, business contact details (including address, telephone number, email address), name of the organisation you work for and related AML/KYC information. If you are a Client you will be provided with a privacy policy provided as part of our onboarding process.

- *Other Third Parties*

If you are a business contact such as a supplier, vendor, event attendee or interested in our services we may collect personal data for our legitimate business purposes including your name, title, business and/or personal contact details (including address, telephone number, email address), name of the organisation you work for and/or is a controlling person of, job title and role.

- *General*

We do not expect to collect any special categories of data about you (such data categories include information relating to your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data).

Please note this website is not intended for children, and we do not knowingly collect data relating to children.

How we use your Personal Information

Camrose Capital and its sub-processors will hold, use and disclose your personal information described above for our legitimate business purposes including:

1. to provide our services to you;
2. to maintain our business relationship;
3. to answer your enquiries;
4. to communicate and market our products and services to you and provide reports and other information – where you have either consented to receive such communications (if necessary) or where we otherwise have a lawful basis to send these to you;
5. to fulfil contractual obligations with our Clients and third party suppliers;
6. in certain circumstances, to provide further services to you by sharing your personal information with trusted third parties, where this is necessary or upon request. Further details about this are set out in the separate section below on How we Share your Personal Information;
7. to scan and monitor the content of and attachments to emails sent to us for viruses or malware, to process and encrypt personal data to ensure the security of and to manage email traffic, and to store personal data on our systems in pursuance of our legitimate interests, such as for document retention purposes;
8. to improve our website, marketing and customer experience on the basis of our legitimate interests using data analytics;
9. to release personal information to regulatory or law enforcement agencies, both in the UK and US if we are required or permitted to do so; and,
10. to comply with legal or regulatory requirements, which includes the provision of fund and Client documentation and performance information.

The legal basis for processing your Personal Information

Under UK GDPR, the main grounds that we rely upon in order to process personal data are the following:

- (a) Necessary for entering into, or performing, a contract – in order to perform obligations that we undertake in providing a service to you, or in order to take steps at your request to enter into a contract with us, it will be necessary for us to process your personal data;
- (b) Necessary for compliance with a legal obligation – we are subject to certain legal requirements which may require us to process your personal data. We may also be obliged by law to disclose your personal data to a regulatory body or law enforcement agency;
- (c) Necessary for the purposes of legitimate interests – either we, or a third party, will need to process your personal data for the purposes of our (or a third party's) legitimate interests, provided we have established that those interests are not overridden by your rights and freedoms, including your right to have your personal data protected. Our legitimate interests include responding to requests and enquiries from you or a third party, optimising our website and customer experience, informing you about our products and services, providing information on the performance of funds, and ensuring that our operations are conducted in an appropriate and efficient manner; and
- (d) Consent – in some circumstances, we may ask for your consent to process your personal data in a particular way.

How we share your Personal Information

In certain circumstances we will share your personal information with other parties. Details of those parties are set out below along with the reasons for sharing it.

- *Trusted Third Parties*

We may share your personal data with trusted third parties where we have retained them to provide services that you or our clients have requested.

We may also share your personal information with third parties who perform functions on our behalf and provide services to us such as:

- fund administrators;
- third party data processors we engage to host information on our behalf;
- where required for legitimate business purposes and/or to fulfil other legal or regulatory obligations: organisations which provide us with compliance, legal, company secretarial, accounting, tax and finance, HR, funds and account management, and ancillary services;
- professional advisors, including auditors, lawyers and tax and compliance consultants;
- data analytics providers;
- IT consultants carrying out testing and development work on our business technology systems;
- research and mailing houses; and/or
- function co-ordinators.

We require minimum standards of confidentiality and security from such third parties. To the extent that any personal information is provided to third parties outside the UK or the EEA, or who will access the information from outside the UK or the EEA, we will ensure that approved safeguards are in place, such as the approved standard contractual clauses and/or additional security measures or safeguards.

- *Regulatory and Law Enforcement Agencies*

As noted above, if we receive a request from a regulatory body or law enforcement agency, and if permitted under UK GDPR and other laws, we may disclose certain personal information to such bodies or agencies, including regulatory bodies or law enforcement agencies in the US.

How long we will hold your Personal Information

The length of time we will hold or store your personal data for will depend on factors such as: the services we perform for you and for how long you require these, the purposes for which we hold your personal data, any legal or regulatory retention periods which may require us to retain a copy for a certain time period, including for resolving disputes, preventing fraud and abuse, defending or proceeding legal claims or enforcing our terms and conditions or other rights and obligations. We will not keep your personal data for purposes for longer than is necessary and we will only retain the relevant personal data that is necessary in relation to the purpose.

We will store certain categories of your personal data for the necessary amount of time and may do so for a short while longer to allow for information to be retrieved, reviewed and disposed of if necessary.

Data security

We endeavour to protect the security of your personal information. We use current industry standard technology to maintain the confidentiality and accuracy of the electronic information you provide to us. We also have security measures in place in respect of our physical facilities to protect against loss, misuse or unauthorised alteration of the information which you provide to us.

As you may be aware, no data transmission over the internet can be entirely secure. As a result, while we will always use reasonable endeavours to protect your personal information, we cannot guarantee that any information you submit to us will be free from unauthorised third-party use or intrusion. Therefore, we cannot guarantee the security of your personal information nor the use of the website and accordingly we do not accept any responsibility for any damage or loss caused as a result.

We cannot guarantee that the website is free from viruses or malicious codes and accordingly we do not accept any responsibility for any damage or loss caused by any such viruses or codes. You agree that it is your responsibility to satisfy yourself that your own information technology/equipment used to access the website is protected against such viruses and/or codes.

Your rights on information we hold about you

You have certain rights in relation to personal information we hold about you. Details of these rights and how to exercise them are set out below. We may require evidence of your identity before we are able to act on your request.

- *Right of Access*

You have the right at any time to ask us for a copy of the personal information about you that we hold. You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances. If we refuse your request or any element of it, we will provide you with our reasons for doing so.

- *Right of Correction or Completion*

If personal information we hold about you is not accurate or is out of date and requires amendment or correction you have a right to have the data rectified or completed. You can let us know by contacting us using the details in the Contact section above.

- *Right of Erasure*

In certain circumstances, you have the right to request that personal information we hold about you is erased e.g. if the information is no longer necessary for the purposes for which it was collected or processed, or our processing of the information is based on your consent and there are no other legal grounds on which we may process the information.

- *Right to object to or restrict processing*

In certain circumstances, you have the right to object to our processing of your personal information by contacting us using the details in the Contact section above. For example, if we are processing your information on the basis of our legitimate interests and there are no compelling legitimate grounds for our processing which override your rights and interests. Whilst we have no intention to use your personal information for marketing purposes, you also have the right to object to use of your personal information for marketing purposes.

You may also have the right to restrict our use of your personal information, such as in circumstances where you have challenged the accuracy of the information and during the period where we are verifying its accuracy.

- *Right of Data Portability*

In certain instances, you have a right to receive any personal information that we hold about you in a structured, commonly used and machine-readable format. You can ask us to transmit that information to you or directly to a third-party organisation. This right exists only in respect of personal information that you have provided to us previously and is processed by us using automated means. While such requests can be made, we are not able to guarantee technical compatibility with a third party organisation's systems. We are also unable to comply with requests that relate to personal information of others without their consent. If we are unable to comply with any request for the exercise of your rights we will provide you our reason(s).

You can exercise any of the above rights by contacting us as described above in the Contact section.

Consent

To the extent that we are processing your personal information based on your consent, you have the right to withdraw your consent at any time. You can do this by contacting us using the details in the Contact section above.

Transferring data outside the UK or the EEA

If we are planning to transfer your personal information outside of the UK or the EEA (for example, to the domicile of the funds) Camrose Capital applies equal rigour to the security of data transferred and held internationally by us. We will take all steps reasonably necessary to ensure that your personal information is treated securely and in accordance with this Privacy Policy and applicable data protection legislation when it is processed in, or otherwise accessed from, a location outside the EEA. Should you wish to refer to them, the standard contractual clauses for the protection of personal data approved by the EU Commission can be found here: [Europa.eustandard-contractual-clauses-scc](https://eudataprivacy.europa.eu/contractual-clauses-scc/).

Complaints

If you are unhappy about our use of your personal information, please contact us using the contact details provided at the start of this Privacy Policy.

You are also entitled to lodge a complaint with the UK Information Commissioner's Office: <https://ico.org.uk/concerns/>. If you live or work outside the UK or you have a complaint concerning our activities outside the UK, you may prefer to lodge a complaint with a different supervisory authority such as in your local jurisdiction.

Changes to our Privacy Policy

This privacy policy can be changed by Camrose Capital at any time. If we change our Privacy Policy in the future, we will advise you of material changes or update our Privacy Policy by including it on website: www.camrosecapital.com.

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