

CG Asset Management Limited. (the "Company", "we", "us" or "our") is committed to protecting the privacy of individuals whose data it processes ("you" or "your")

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1. Important information and who we are

The Company is committed to protecting the privacy and security of personal data which is entrusted to us. This privacy policy aims to give you information on how the Company collects and processes your personal data as a controller of data supplied by shareholders and potential investors in connection with holdings and/or investing in the funds that are managed by the Company (**the "Funds"**), including through your use of the website (www.cgasset.com), by signing up to our mailing list, by sending us correspondence and/or providing us with products and/or service.

In addition, it outlines your data protection rights under the data protection regime introduced by the EU's General Data Protection Regulation (Regulation 2016/679) (the "GDPR") and by the UK's Data Protection Act 2018.

This website is not intended for children and we do not knowingly collect data relating to children.

CG Asset Management Limited is a company registered in England and Wales with company registration number 4056163, whose registered address is at 20 King Street, London, England, EC2V 8EG. If you have any queries in relation to the processing of your personal data under this policy please contact the Company's Compliance Officer, Richard Goody, in writing at the above address.

2. Categories of data subjects

(i) Investors in our managed funds

The kind of information we hold about you

We may hold personal data about investors which is provided to us by you directly as a result of your holding and/or investment in the Funds (through telephone calls and/or corresponding with us) or which is provided to us by third parties including the appointed Administrators of the Funds. We may also process personal data about individuals that are connected with you as an investor (for example directors, trustees, employees, representatives, beneficiaries, shareholders, investors, clients, beneficial owners or agents).

In connection with your holding and/or investment in the Funds, we may collect, store, and use the following categories of personal information about you: contact details (including name, title, address, telephone number, personal email address), your date of birth, copies of passport, driving licences and utility bills, bank account details and details relating to your investment activity.

How we will use information about you

Your personal data may be processed by the Company or its processors (or any of their affiliates, agents, delegates or sub-contractors) for the following purposes:

- to provide you with information on the Company and/or the Funds, which is being carried out to pursue the Company's legitimate interests;
- to allow us to assist the Funds' appointed Administrator with their administration of your account including payment of dividends, obtaining missing documentation and any other information which is necessary for the Funds and their Administrator to comply with applicable laws and/or in their legitimate interest;
- to scan and monitor emails sent to us (including attachments) for viruses or malicious software, to process and encrypt personal data to protect and manage email traffic, and to store personal data on our systems to pursue our legitimate interests including for document retention purposes; and
- such other actions as are necessary to manage the activities and/or to comply with the legal obligations of the Company, including by processing instructions and enforcing or defending the rights and/or interests of the Company, in order to comply with the its legal obligations and/or to pursue the Company's legitimate interests.

Basis on which we process your data

Where such processing is being carried out on the basis that it is necessary to pursue the Company's legitimate interests, such legitimate interests are not overridden by your interests, fundamental rights or freedoms. Such processing may include the use of your personal data for the purposes of contacting you about your investment but will not extend to marketing unless you have specifically requested to receive such.

If the Company wishes to use your personal data for other purposes which require your consent, we will contact you to request this.

(ii) Visitors to our website

Clever Little Design ("**CLD**") is responsible for our website and processes data on behalf of the Company. For the purposes of this section "**we**" includes information collected, processed and used by CLD as the data processor on behalf of the Company.

The kind of information we hold about you

CLD will not collect any information about individuals, except where it is specifically and knowingly provided by them.

When you visit the Company's website, the web server collects some basic information such as your browser type, IP address, internet service provider's domain name, which pages you accessed on the site, and when. This data is subject to technical and organisational security measures, in particular encrypted data transfer to prevent any misuse by third parties.

CLD evaluate this information to analyse the use of the Website in order to help guide improvements and to provide you with and maintain the quality of the Website.

Your anonymity as an individual user is maintained in this respect. In particular, no personal details such as name, address, telephone number or email address is saved or processed except for the details captured over web forms with your consent.

If you register for the alert service, you will need to provide your name and email address. By registering for the alerts, you will receive monthly factsheets and quarterly reports from CGAM.

The registration process involves you providing your consent to this use of your name and email address before your details will be collected. As consent to use your data for the above-mentioned purposes can also cover the transfer of your data to other organisations within CLD, your data may also be passed on to these entities. The data that we collect from you may be transferred to, and stored at, a destination outside the United Kingdom ("UK") and your country for the purposes outlined in this Privacy Policy. It may also be processed by staff operating outside the UK and your country who work for us or for one of our service providers for the purposes outlined in this Privacy Policy.

We do not collect any sensitive personal data or special categories of personal data about you through our website (this includes details about 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). Nor do we collect any information about criminal convictions and offences.

How we collect your data

We use different methods to collect data from and about you including through:

- direct interactions with you, including by filling in forms. This includes personal data you provide when you subscribe to our publications and/or request marketing to be sent to you.
- Automated technologies or interactions. As you interact with our website, we may automatically collect technical data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies.

- Technical data from the following parties:
 - analytics providers such as Google based outside the UK;
 - search information providers based inside OR outside the UK.

How we will use information about you

Your personal data may be processed by the Company or its processors or sub-processors, including CLD, (or any of their affiliates, agents, delegates or sub-contractors) for the following purposes:

- to send you monthly factsheets, quarterly performance reviews and invitations to events which we will do with your consent;
- to use data analytics to improve our website, marketing, customer experiences on the basis of our legitimate interests;
- to comply with legal or regulatory requirements;
- to scan and monitor emails sent to us (including attachments) for viruses or malicious software, to process and encrypt personal data to protect and manage email traffic, and to store personal data on our systems to pursue our legitimate interests including for document retention purposes; and
- such other actions as are necessary to manage the activities of the Company, including by processing instructions, and enforcing or defending the rights and/or interests of the Company in order to comply with their legal obligations and/or to pursue their legitimate interests.

We will use your personal data in the following circumstances: where it is necessary for our legitimate interests, or those of a third party (including in relation to the sending of electronic marketing communications) and where your interests and fundamental rights are not overridden by those interests, or where we need to comply with a legal or regulatory obligation.

If we consider it necessary to obtain your consent in relation to the use of your personal data, we will contact you to request this consent. In such circumstances, we will provide you with full details of the personal data that we would like and the reason we need it, so that you can carefully consider whether you wish to consent. If you decide to provide your consent, you have the right to withdraw your consent at any time, although that will not affect the lawfulness of processes based on consent before its withdrawal. To withdraw your consent or to opt out of receiving marketing communication, please contact us in writing or following the unsubscribe instructions included in each electronic marketing communication.

Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

Links to websites

Where the website provides links to other websites, the Company and CLD are not responsible for the data protection/privacy/cookie usage policies of such other websites, and you should check these policies on such other websites if you have any concerns about them.

If you use one of these links to leave our website, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting a linked website and such websites are not governed by this policy. You should always exercise caution and review the privacy policy applicable to the website in question.

Cookies

A cookie is a small file which asks permission to be placed on your computer. Once you agree, the file is added and the cookie helps analyse web traffic or lets you know when you visit a particular website. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences. We use traffic log cookies to identify which pages are being used. This helps us analyse data about web page traffic and improve our Website by tailoring it to the needs of users. We only use this information for statistical analysis purposes.

Overall, cookies help us provide a better website by enabling us to monitor which pages users find useful and which they don't. A cookie does not give us access to a user's computer or any information about them, other than the data they choose to share with us.

The browsers of most computers, smartphones and other web-enabled devices are usually set up to accept cookies. If your browser preferences allow it, you can configure your browser to accept all cookies, reject all cookies, or notify you when cookies are set. Each browser is different, so check the "Help" menu of your browser to learn about how to change your cookie preferences.

However, please remember that cookies are often used to enable and improve certain functions on our website. You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly.

Our Cookie Policy can be [accessed here](http://www.cgasset.com/site-services/cookie-policy) (<http://www.cgasset.com/site-services/cookie-policy>).

(iii) Business contacts

The following section of this policy sets out how the Company may process personal data (as a controller) about its business contacts and (current, previous and/or potential) service providers (and employees of service providers) and data subjects that have provided a business card to, or have corresponded with the Company.

The kind of information we hold about you

We may collect, use, store and transfer different kinds of personal data about you which you provide to us including: name, date of birth, address, email address, telephone numbers, place of work and job title.

We do not collect any sensitive personal data or special categories of personal data about you through our website (this includes details about 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). Nor do we collect any information about criminal convictions and offences.

How we will use information about you

We will use your personal data in the following circumstances: where it is necessary for our legitimate interests, or those of a third party (including in relation to the sending of electronic marketing communications) and where your interests and fundamental rights are not overridden or where we need to comply with a legal or regulatory obligation.

Your personal data may be processed by the Company, its processors or its sub-processors (or any of their affiliates, agents, delegates or sub-contractors) for the following purposes:

- to hold your personal data on our system and to contact you on the basis of the legitimate interests of the Company (including in connection with using the services that you provide);
- in respect of suppliers, to allow us to process payments and orders in respect of any goods and services provided;
- to send you monthly factsheets, quarterly performance reviews and invitations to events which for which you have requested to receive;
- to comply with legal or regulatory requirements;

- We may record, monitor and retain any and all communications (which may include the recording and monitoring by a third party appointed by us), including facsimile, email and other electronic messaging, telephone conversations and other electronic communications with you, for the purposes of providing services to you (or to your employer) and/or otherwise in order to comply with applicable law and to scan and monitor emails sent to us (including attachments) for viruses or malicious software; and
- such other actions as are necessary to manage the activities of the Company, including by processing instructions and enforcing or defending the rights or interests of the Company, in order to comply with their legal obligations and/or to pursue their legitimate interests.

Basis on which we process your data and right to withdraw consent

If we consider it necessary to obtain your consent in relation to the use your personal data, we will contact you to request this consent. In such circumstances, we will provide you with full details of the personal data that we would like and the reason we need it, so that you can carefully consider whether you wish to consent.

If you decide to provide your consent, you have the right to withdraw your consent at any time, although that will not affect the lawfulness of processes based on consent before its withdrawal. To withdraw your consent or to opt out of receiving marketing communication, please contact us in writing or following the unsubscribe instructions included in each electronic marketing communication. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

Where such processing is being carried out on the basis that it is necessary to pursue the Company's legitimate interests, such legitimate interests do not override your interests, fundamental rights or freedoms. Such processing may include the use of your personal data for the purposes of sending you electronic marketing communication, in relation to which you can at any time subscribe by following the instructions contained in each marketing communication.

3. Disclosures of your personal data

We will not disclose personal information we hold about you to any third party except as set out below.

We may disclose your personal data to third parties who are providing services to us, including IT service providers, PR and marketing service provider, processors of the Company (including printers, registrars, brokers, the manager, administrators) telephone service providers, document storage providers, backup and disaster recovery service providers.

We may also disclose personal data we hold to third parties:

- in the event that we sell any business or assets, in which case we may disclose personal data we hold about you to the prospective and actual buyer of such business or assets; and/or
- if we are permitted by law to disclose your personal data to that third party or are under a legal obligation to disclose your personal data to that third party.

4. Data retention

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. To determine the appropriate retention period for personal data, we 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.

5. International transfers

Where we transfer your personal data outside the UK, we will ensure that it is protected in a manner that is consistent with how your personal data will be protected by us in the UK. This can be done in a number of ways, for instance:

- the country that we send the data to might be approved by the European Commission or a relevant data protection authority (as offering equivalent protections to those afforded in the UK);
- the recipient might have signed up to a contract based on “model contractual clauses” approved by the European Commission, obliging them to protect your personal data;
- where the recipient is located in the US, it might be a certified member of the EU-US Privacy Shield scheme; or
- in other circumstances where the law permits us to otherwise transfer your personal data outside the UK

In all cases, however, we will ensure that any transfer of your personal data is compliant with data protection law.

6. Data security

The Company has put in place measures to ensure the security of the personal data it collects and stores about you. It will use its reasonable endeavours to protect your personal data from unauthorised disclosure and/or access, including through the use of network and database security measures, but it cannot guarantee the security of any data it collects and stores.

We have put in place through our service providers appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those 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.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

7. Your legal rights

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

- Request access to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- Request correction of the personal information that we hold about you where it is incomplete or inaccurate.
- Request erasure of your personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- Object to processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- Request the restriction of processing of your personal information, 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.

- Withdraw your consent where we have previously requested such. Withdrawing your consent will not affect the lawfulness of processes based on consent before its withdrawal. To withdraw your consent or to opt out of receiving marketing communication, please contact us in writing or following the unsubscribe instructions included in each electronic marketing communication. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

If you wish to exercise any of the rights set out above, please contact us in writing.

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.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

You 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 (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

8. Changes to this privacy notice

We may update this privacy notice from time to time, and will publish such updates on our website. We may also notify you from time to time about the processing of your data.

9. Further information

If you have any queries about this policy or your personal data, or you wish to submit an access request or raise a complaint about the way your personal data has been handled, please do so in writing and address this to the Company at 20 King Street, London, England, EC2V 8EG.