

Privacy Policy

Restricted Access Ltd (the "**Company**") and any third party service providers, functionaries and agents appointed by the Company and acting on its behalf (together the "**Firm**", "**we**", "**us**", "**our**") are committed to protecting your personal data and are required, by Data Protection Legislation (defined below), to provide individuals with certain information about how we use your personal information.

This privacy policy ("**Privacy Policy**") explains what personal information we collect from you or you provide to us, how we use it and with whom we share that information. This Privacy Policy also sets out your rights and who you can contact for more information.

In this Privacy Policy:

- your personal information is sometimes also referred to as "personal data";
- we may also sometimes collectively refer to handling, collecting, protecting and storing your personal data as "processing" such personal data; and
- the term "**Data Protection Legislation**" means the EU General Data Protection Regulation 2016/679; together with all other applicable legislation relating to privacy or data protection.

For the purposes of Data Protection Legislation the data controller is the Company.

1 What information we collect about you

The Firm may collect, record and use information that personally identifies you in physical and electronic form and will hold, use and otherwise process the data in accordance with Data Protection Legislation and as set out in this Privacy Policy.

The personal data we collect and process may include:

(A) Information that you provide to us

This is information that personally identifies you that you provide to us. Such information may typically include:

- information obtained from identification documentation (including your name, email address, telephone number, address (including city, postcode and country), nationality and national identity numbers (where applicable));
- your professional title and occupation;
- your age, date of birth and marital status;
- personal identifiers such as your social security number, national insurance number, tax file number, IP address or your internal electronic identifiers;
- information which we need to conduct 'know your client' checks such as details relating to your passport and credit history; and

- other information you provide in the course of your dealings with us or which we require you to provide so that we can provide you with products and services.

(B) Information that we collect or generate about you

This may include:

- files that we may produce as a record of our relationship with you, including contact history, correspondence records; and
- any personal data that you provide during telephone and email communications with us which we may monitor and record in order to resolve complaints, improve our service and in order to comply with our legal and regulatory requirements.

(C) Information we obtain from other sources

This may include information from publicly available sources, including third party agencies such as credit reference agencies, public databases, registers and records such as Companies House and the FCA Register and information obtained from sanction checking and background screening providers.

In certain circumstances, we also collect and process what are known as 'special categories' of personal data (as defined by Data Protection Legislation). Money laundering, sanctions, financial crime and fraud prevention checks sometimes result in the Company obtaining information about actual or alleged criminal convictions and offences.

You are not obliged to provide us with your personal data where it is requested but we may be unable to provide certain products and services or proceed with your business relationship with the Company if you do not do so.

2 How we collect your information

The personal information we collect comes from:

- application forms or other materials you or your authorised representative submits to us during the course of your relationship with the Firm;
- your or your authorised representative's interactions with the Firm, transactions and use of our products and services (including the use of any of our websites);
- your or your authorised representative's business dealings with the Firm, including via email, telephone or as stated in contracts with you;
- depending on the products or services you or your authorised representative requires, third parties (including for credit and money laundering checks, among other things); and
- recording and monitoring tools that we use for compliance or security purposes (e.g. recording of telephone calls, monitoring emails, etc.).

3 How we use your information

Our primary purpose in collecting your personal information is to facilitate and record your the, the management and administration of your engagements with our

Company and any related administration on an on-going basis.

Additionally, on an ongoing basis during your relationship with us, we may use your information for the following specific purposes:

- to process transactions and to improve the quality of the service that we provide to you;
- to disclose information to other third parties such as service providers of the Company, auditors, regulatory authorities and technology providers for the purposes outlined in this Privacy Notice (as set out in more detail below)
- to communicate with you as necessary in connection with the proper running of the Firm;
- to update and maintain records and carry out fee calculations;
- to monitor and record calls and electronic communications;
- in connection with the Company's internal management and reporting;
- to report regulatory and tax related information to regulatory and tax authorities in order to comply with a legal obligation, including any obligation arising under legislation implementing the U.S. Foreign Account Tax Compliance Act of 2010, as amended, and the Organisation for Economic Co-operation and Development's Common Reporting Standard;
- verifying the identity to comply with statutory and regulatory requirements in relation to anti-money laundering procedures;
- in order to carry out anti-money laundering checks and related actions which are necessary to comply with legal obligations, in relation to, the prevention of fraud, money laundering, terrorist financing, bribery, corruption, tax evasion and to prevent the provision of financial and other services to persons who may be subject to economic or trade sanctions, on an on-going basis;
- for prudential and risk management purposes;
- to provide you with any products and services that you request from us; and
- other reasons compatible with the primary purpose.

We will only use your personal information for the purposes for which it was collected unless we reasonably consider that it is necessary to use it for another reason and that reason is compatible with the original purpose.

4 Legal grounds for using your personal information

Data Protection Legislation permits us to process your personal data in the way that we do because such processing is:

- necessary for the purposes of the legitimate interests that we pursue, which are to run and administer the Firm, to discharge our legal obligations, to store and disclose information where necessary and to evaluate, develop and improve our services; or
- necessary for the performance of a contract with you;
- necessary in order to comply with a legal obligation to which we are subject; or
- otherwise with your express consent.

To the extent that we process any special categories of data relating to you for any of the purposes outlined above, we will do so because either: (i) you have given us your explicit consent to process that personal data; (ii) you have made the personal data manifestly public; or (iii) the processing is necessary for the establishment, exercise or defence of legal claims.

5 Providing your information to third parties

We may share your personal information with the following categories of recipients who may receive it and process it for the purposes outlined in this Privacy Policy:

- representatives, agents, custodians, intermediaries and/or other third party product providers appointed by you;
- third party agents and contractors for the purposes of them providing services both to us and to you (for example, professional advisers and IT and communications providers). These third parties will be subject to appropriate data protection obligations;
- any regulatory, supervisory or governmental authorities to the extent we are required by law or regulation to do so, or in other limited circumstances (for example if required by a court order or regulatory authority, or if we believe that such action is necessary to prevent fraud) or to establish, exercise or defend our legal rights; and
- tax authorities.

The Company does not undertake marketing activities for third parties, nor does it provide information to third parties for their own marketing purposes.

6 Transferring data outside of the EEA

We may transfer your personal data to locations outside your country. As such, your personal data may be transferred to, and stored at, a destination outside the European Economic Area ("**EEA**"). Some of these destinations may not have data protection laws that are similar to those in the EEA and may not be regarded by the European Commission as providing an adequate level of data protection. When we, or our permitted third parties, transfer personal information outside the EEA, we will ensure that the transfer is subject to appropriate safeguards in accordance with Data Protection Legislation.

7 Automated processing

We do not carry out automated decision-making or profiling based on your personal data.

8 Your rights

In the circumstances where we collect, use or store your personal information, as outlined in this Privacy Policy, you may have the following rights and, in most cases, you can exercise them free of charge:

- to be informed about the processing of your personal data (i.e. for what purposes, what types, to what recipients it is disclosed, storage periods, any third party sources from it was obtained, confirmation of whether we undertake automated decision-making, including profiling, and the logic, significance and envisaged consequences);
- to request access to or a copy of any personal data which we hold about you;
- to rectification of your personal data, if you consider that it is inaccurate or incomplete;
- to ask us to delete your personal data, if you consider that we do not have the right to hold it (please note that there may be circumstances where you ask us to erase your personal information but we are required or entitled to retain it);
- to withdraw your consent to our processing of your personal data (please note that we may still be entitled to process your personal data if we have another legitimate reason for doing so, for example we may need to retain your personal data to comply with legal or regulatory obligations or to satisfy our internal audit requirements);
- to restrict processing of your personal data;
- where applicable, to data portability (moving some of your personal data elsewhere) in certain circumstances;
- to object to your personal data being processed in certain circumstances;
- not to be subject to a decision based on automated processing and to have safeguards put in place if you are being profiled based on your personal data; and
- the right to lodge a complaint with the relevant data protection regulator if you think that any of your rights have been infringed by us.

You can exercise your rights by contacting us using the details provided at paragraph 13 below. We will endeavour to respond within a reasonable period and in any event within one month in compliance with Data Protection Legislation. We will comply with our legal obligations as regards your rights as a data subject.

We will correct any incorrect or incomplete information of which we are made aware and will stop processing your personal data, or erase it, where there is no legal reason for us to continue to hold or use that information.

We aim to ensure that the information we hold about you is accurate at all times. To assist us in ensuring that your information is up to date, do let us know if any of your personal details change. Failure to provide accurate information or to update changed information may have a detrimental impact on your investment in the Company, including the processing of any subscription or redemption instructions or the suspension of your account.

9 How long we keep your information

We will only keep the information we collect about you for as long as required for the purposes set out in this Privacy Policy or as long as required for us to comply with any legal obligations to which we are subject being the longest of the following periods:

- as long as is necessary for the relevant activity or as long as is set out in any relevant agreement you enter into with the Company;
- the length of time it is reasonable to keep records to demonstrate compliance with professional or legal obligations;
- any retention period that is required by law; or
- the end of the period in which litigation or investigations might arise in respect of an investment in the Company.

This will involve us regularly reviewing our files to check that information is accurate, up-to-date and still required.

10 How we protect your information

We ensure that there are appropriate technical, physical, electronic, and administrative safeguards in place to protect your personal information from unauthorised access. The Firm has controls and mechanisms in place designed to detect, respond and recover in case of any adverse events that may arise.

11 Changes to Privacy Policy

This Privacy Policy may be amended from time to time without notice, in which case the date of this Privacy Policy will be revised.

If our Privacy Policy changes in any way, we will place an updated version on the Company's website. Regularly reviewing the Privacy Policy on the Company's website ensures that you are always aware of what information we collect, how we use it and under what circumstances, if any, we will share it with other parties.

12 Other

This Privacy Policy is for your information and should not be used as the basis for any decision to purchase services from the company

13 Complaints

Questions, comments and requests regarding this Privacy Policy are welcomed and should be addressed to the Company Secretary, at +44 (0)7552 253842. Our address is 71-75 Shelton St, London, WC2H 9JQ - United Kingdom. You may also use these contact details if you wish to make a complaint to us relating to your privacy.

If you have any concerns about our use of your information, you also have the right (as a UK resident) to make a complaint to the Information Commissioner's Office, which regulates and supervises the use of personal data in the UK, via their helpline on 0303 123 1113.

