

Privacy Notice for International Asset Management Limited

International Asset Management Limited (UK company registration number 2355655) (“IAM”) is committed to protecting the privacy of our clients. This notice sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by IAM.

The General Data Protection Regulation (GDPR) (Regulation (EU) 2016/679) replaces the Data Protection Regulation (Directive 95/46/EC). The aim of the Regulation is to harmonise data protection legislation across EU member states, enhancing privacy rights for individuals and providing a strict framework within which commercial organisations can legally operate.

The UK General Data Protection Regulation (‘UK GDPR’) is the retained EU law version of the General Data Protection Regulation (‘EU GDPR’ – EU 2016/679). UK GDPR was effectively incorporated into domestic law on the 31 December 2020 by the Data Protection, Privacy and Electronic Communications (Amendments etc) (EU Exit) Regulations 2019 and the Data Protection Act 2018 (‘DPA’).

Whilst a UK firm is subject to UK GDPR, a UK firm could also be subject to EU GDPR if it handles the data of EU persons (which include EU clients and investors), as per EU GDPR Article 3(2). Hence forth, unless otherwise stated all references GDPR in this Privacy Policy are to both UK and EU GDPR (collectively, “GDPR”).

Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

For the purposes of data protection legislation in force from time to time, the data controller is IAM of 11a Regent Street, London, W1S 4LR. Our Data Protection Officer is Alexander von Mühlen.

Who we are and what we do

IAM is authorised and regulated by the Financial Conduct Authority (‘FCA’) as a full scope UK Alternative Investment Fund Manager (‘AIFM’). We have additional regulatory permissions to undertake other investment activities and as a result are categorised by the FCA as a ‘Collective Portfolio Management Investment’ (‘CPMI’) firm.

We provide discretionary and advisory investments management services to our clients. IAM is both a data controller and data processor.

We may collect the personal data of the following types of people to allow us to undertake our business;

- employees
- customers and clients
- suppliers
- complainants, enquirers
- professional advisers and consultants.

The personal data we collect includes but may not be limited to:

- personal details
- family details
- life-style and social circumstances
- employment details
- financial details
- goods or services
- business activities of the person whose personal information we are processing.

What data privacy principles does the Firm adhere to?

- The Firm will process all personal data in a lawfully, fair and transparent manner;
- The Firm will only collect personal data where it is necessary;
 - For the Firm to provide a service to you;
 - For you to provide a service to the Firm;
 - For the Firm to keep you informed of its products and services; or
 - For the Firm to comply with its legal and regulatory obligations.
- The personal data collected by the Firm will be adequate, relevant and limited to what is necessary in relation to the specific purpose for which your data will be processed;
- The Firm will take all reasonable steps to ensure that personal data is accurate and, where necessary, kept up-to-date;
- The Firm will maintain personal data in a form that permits identification no longer than is necessary for the purposes for which the personal data has been collected for processing, in accordance with the Firm's record retention requirements as mandated by the Financial Conduct Authority;
- The Firm will hold and process personal data in a manner that ensures appropriate security;
- The Firm will only share personal data where it is necessary to provide the agreed service or where it is necessary for the Firm to comply with its legal and regulatory requirements.
- The Firm will only utilise a service provider based outside of the UK for the processing of personal data where this is strictly necessary to facilitate our services to you. In all cases, we will ensure service providers are fully compliant with GDPR, or deemed equivalent, ahead of transferring any personal data.

Purposes of the processing and the legal basis for the processing

We process personal data to enable us to provide investment management services, conduct research, maintain our own accounts and records, promote our services and to manage and support our employees.

Our legal basis for the processing of personal data is our legitimate business interest, described in more detail below, although we will also rely on contract, legal obligation and consent for specific uses of data.

We will rely on contract if we are negotiating or have entered into an agreement with you or your organisation or any other contract to provide services to you or receive services from you or your organisation.

We will rely on legal obligation if we are legally required to hold information on you to fulfil our legal obligations.

Should we want or need to rely on consent to lawfully process your data we will request your consent orally, by email or by an online process for the specific activity we require consent for and record your response on our system. Where consent is the lawful basis for our processing you have the right to withdraw your consent to this particular processing at any time.

Our legitimate business interests

Our legitimate interests in collecting and retaining your personal data is described below.

As a regulated investment management services firm we are required to hold personal data on our clients and employees. In delivering our services we regulatory conduct research on other firms and their owners/employees. We also conduct marketing and distribution in respect of our services and products.

How have I been categorized in accordance with GDPR?

The GDPR requires the Firm to inform you of the legal basis on which we maintain your personal data. Typically, the Firm will reach out to you personally to confirm this; however, as a general rule the following is applicable:

- Clients – Information is maintained on the basis of contractual obligation and/or legitimate interests (where relevant);
- Service providers – Information is maintained on the basis of contractual obligation; and

- Database/marketing contacts – Information is maintained on the basis of legitimate interest.

Disclosure of your information inside and outside of the EEA

We will share your personal information with:

Any member of our group of companies both in the EEA and outside of the EEA.

Selected third parties including but not limited to reference/back-ground checking agencies, payroll service providers, insurance brokers, compliance consultants, financial institutions, regulators, digital storage facilities and other service providers.

The lawful basis for the third party processing will include:

- their own legitimate business interests in processing your personal data
- satisfaction of their contractual obligations to us as our data processor
- for the purpose of a contract in place or in contemplation
- to fulfil their legal obligations.

Where we store and process your personal data

The data that we collect from you may/will be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). It may be transferred to third parties outside of the EEA for the purpose of our investment services, currently this is for data administration purposes primarily – for example we employ cloud solutions for certain electronic communications and certain files/records may be stored on servers at group companies. It may/will also be processed by staff operating outside the EEA who work for us or for one of our suppliers. By submitting your personal data, you agree to this transfer, storing or processing. IAM will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy notice.

All information you provide to us is stored on our secure servers or secured facilities. We will use strict procedures and security features to try to prevent unauthorised access.

How long will we keep your personal information?

As a regulated entity, the Firm is required to maintain its books and records for a prescribed period (five years from either the ceasing of a business relationship, or, in the case of non-clients, from the making of a record – or alternatively, for seven years, where specifically requested to do so by the Financial Conduct Authority). As such, information that falls in scope of either of these requirements is retained in line with the mandated timeframe.

Any information that is outside the scope of this requirement will be retained whilst relevant and useful, and destroyed where this ceases to be the case or where the data subject specifically requests this.

Notification of changes to this Policy

The Firm may, from time to time, review and update this policy. Compliance maintains the latest version of this policy and where the changes are deemed material, it will make you are aware of these.

Your rights

Once you have provided your details to the Firm, you have certain rights which apply, depending on your relationship with the Firm, the information you have shared with us and the Firm's legal and regulatory obligations.

- You have the right to request a copy of the information that we hold about you. If you would like a copy of some, or all, of your personal information, please email the Firm at amuhlen@iam.uk.com. The Firm will provide this information to you within one month (with the ability to extend this by an additional two

months where necessary), free of charge.

- You have the right to request that the information the Firm holds about you is erased under certain circumstances including where there is no additional legal and/or regulatory requirement for the Firm to retain this information.
- As a client, you have the right to request that any information the Firm holds about you be provided to another company in a commonly used and machine-readable format, otherwise known as 'data portability'.
- You have the right to ensure that your personal information is accurate and up to date, or where necessary rectified. Where you feel that your personal data is incorrect or inaccurate and should therefore be updated, please contact amuhlen@iam.uk.com.
- You have the right to object to your information being processed, for example for direct marketing purposes.
- You have the right to restrict the processing of your information, for example limiting the material that you receive or where your information is transferred.
- You have the right to object to any decisions based on the automated processing of your personal data, including profiling.
- You have the right to lodge a complaint with the Information Commissioner's Office (<https://ico.org.uk/concerns/>) if you are not happy with the way that we manage or process personal data.

These rights are subject to any applicable exemptions under the data protection laws.

You may seek to exercise these rights at any time by sending a request by email to amuhlen@iam.uk.com or writing to Data Protection Officer, 11a Regent Street, London, SW1Y 4LR and providing further information (including appropriate proof of identity) as requested by us.

You can withdraw your consent to the processing of your personal information (where we are processing your personal information based on your consent). If you object to the processing of your personal information, or if you have provided your consent to processing and you later choose to withdraw it, we will respect that choice in accordance with our legal obligations. However, this may limit or prevent us from providing the products or services you have asked for. It may also make it more difficult for us to advise you or suggest appropriate alternatives.

If you feel that we do not comply with applicable privacy rules you have the right to lodge a complaint with a competent data protection authority.