



Slater Investments Limited

Privacy Notice (General)

January 2021

Slater Investments Limited

Privacy Policy - General

Slater Investments Limited ('**Company**') is a 'data controller' and gathers and uses certain information about you. In this notice, references to 'we' or 'us' means the Company.

Who we are

We take your privacy very seriously. Please read this privacy policy carefully as it contains important information on who we are and how and why we collect, store, use and share your personal data. It also explains your rights in relation to your personal data and how to contact us or supervisory authorities in the event you have a complaint.

We collect, use and are responsible for certain personal data about you. When we do so we are subject to the UK General Data Protection Regulation (UK GDPR).

The personal information we collect and use

Information collected by us

In the course of opening and operating your account with us, we collect the following personal information when you provide it to us including, for example:

- Personal identification and contact information, such as your name and address, NI numbers, ID or passport number;
- Financial and tax information, such as bank details, tax codes; and
- in the case of a corporate entity, similar details in respect of the Directors, Partners, Trustees, Shareholders, and any Authorised Persons who operate the account.

Information collected from other sources

We may also obtain personal information from other sources, for example, credit rating agencies, regulatory bodies, Companies House, your advisors (where applicable).

How we use your personal information

We use your personal information in order to open an account and operate your account with us, in accordance with our terms and conditions and internal policies and procedures.

Your personal information will also be used in order for us to comply with our legal, tax and regulatory obligations, to carry out money laundering, financial and credit checks, and for fraud prevention and detection purposes.

Who we share your personal information with

We routinely share your personal details with our Fund Administrators, the Depositary/Trustee and Custodians. This data sharing enables your account with us to be opened, administered and operated.

We will share personal information with law enforcement or other public or governmental authorities if required by applicable law.

During the course of Company audits, we may be required to share your personal information with our auditors. However, where possible, this information will be anonymised.

We will not share your personal information with any other third party unless you specifically request us to do so.

How long your personal information will be kept

We will hold your personal data for no longer than reasonably necessary to fulfil the purpose for which it was collected. Once those purposes have been completed which shall hold them for no longer than any period required by law.

Where your personal data is held

Personal data may be held at our offices and those of our service providers, representatives and agents as described above (see above: '***Who we share your personal data with***').

Some of these third parties may be based outside the UK. For more information, including on how we safeguard your personal data when this happens as described below (see below: '***Transferring your personal data out of the UK and EEA***').

Updating your personal information

It is important to inform us of any changes in your personal information to ensure the information held is accurate and kept up to date. If you need to do this please contact us immediately either by email, calling us or in writing.

Transfer of your information out of the UK and the EEA

We may transfer your personal information outside UK and the European Economic Area (EEA).

Under data protection law, we can only transfer your personal data to a country or international organisation outside the UK/EEA where:

- the UK government or, where the EU GDPR applies, the European Commission has decided the particular country or international organisation ensures an adequate level of protection of personal data (known as an 'adequacy decision');
- there are appropriate safeguards in place, together with enforceable rights and effective legal remedies for data subjects; or
- a specific exception applies under data protection law

These are explained below.

Adequacy decision

We may transfer your personal data to certain countries, on the basis of an adequacy decision. These include:

- all European Union countries, plus Iceland, Liechtenstein and Norway (collectively known as the 'EEA');
- Gibraltar; and
- Andorra, Argentina, Canada, Faroe Islands, Guernsey, Israel, Isle of Man, Japan, Jersey, New Zealand, Switzerland and Uruguay.

The list of countries that benefit from adequacy decisions will change from time to time. We will always seek to rely on an adequacy decision, where one exists.

Other countries or international organisations we are likely to transfer personal data to do not have the benefit of an adequacy decision. This does not necessarily mean they provide poor protection for personal data, but we must look at alternative grounds for transferring the personal data, such as ensuring appropriate safeguards are in place or relying on an exception, as explained below.

Transfers with appropriate safeguards

Where there is no adequacy decision, we may transfer your personal data to another country or international organisation if we are satisfied the transfer complies with data protection law, appropriate safeguards are in place, and enforceable rights and effective legal remedies are available for data subjects.

The safeguards will usually include using legally-approved standard data protection contract clauses.

Our Fund Administrators may hold your personal information on its network in Jersey and undertake processing in South Africa in order to facilitate the administration of the Funds. Whilst Jersey is not within the EEA, it is considered by the European Commission to provide an adequate level of protection.

South Africa, however, does not have the same data protection laws as the United Kingdom and the EEA, and we will therefore ensure that any transfer of your personal information is protected and transferred in a manner consistent with the legal requirements applicable to the information; thereby ensuring your privacy rights are safeguarded as well as providing remedies in the unlikely event of any misuse of your information.

Transfers under an exception

In the absence of an adequacy decision or appropriate safeguards, we may transfer personal data to a third country or international organisation where an exception applies under relevant data protection law, eg:

- you have explicitly consented to the proposed transfer after having been informed of the possible risks;
- the transfer is necessary for the performance of a contract between us or to take pre-contract measures at your request;
- the transfer is necessary for a contract in your interests, between us and another person; or
- the transfer is necessary to establish, exercise or defend legal claims

We may also transfer information for the purpose of our compelling legitimate interests, so long as those interests are not overridden by your interests, rights and freedoms. Specific conditions apply to such transfers and we will provide relevant information if and when we seek to transfer your personal data on this ground.

If you would like further information about the safeguards we have in place to protect your personal information, please contact operations@slaterinvestments.com.

Your rights

You have a number of important rights free of charge.

In summary, those include rights to:

- fair processing of information and transparency over how we use your personal information;
- access to your personal information and to certain other supplementary information that this Privacy Notice is already designed to address;
- require us to correct any mistakes in your information which we hold;
- require the erasure of personal information concerning you in certain situations;
- receive the personal information concerning you which you have provided to us, in a structured, commonly used and machine-readable format and have the right to transmit those data to a third party in certain situations;
- object at any time to processing of personal information concerning you for direct marketing;

- object to decisions being taken by automated means which produce legal effects concerning you or similarly significantly affect you;
- object in certain other situations to our continued processing of your personal information;
- otherwise restrict our processing of your personal information in certain circumstances.

For further information on each of those rights, including the circumstances in which they apply, please contact us (see '**How to contact us**' below) or see the Guidance from the UK Information Commissioner's Office (ICO) on individuals' rights.

If you would like to exercise any of those rights, please:

- email, call or write to us;
- let us have enough information to identify you, for example, account number, your name, registration details;
- let us have proof of your identity and address (a copy of your driving licence or passport and a recent utility or credit card bill); and
- let us know the information to which your request relates, including any account or reference numbers, if you have them.

Where you have provided consent to us to process your data in a certain way, you also have the right to withdraw that consent. Where you have provided us with consent to send you any marketing information and you would like to unsubscribe from any of those communications you can also click on the 'unsubscribe' button at the bottom of the emails, or, alternatively, email, call or write to us.

Keeping your personal information secure

We have appropriate security measures in place to prevent personal information from being accidentally lost, or used or accessed in an unauthorised way. We limit access to your personal information to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

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

How to complain

We hope that we can resolve any query or concern you raise about our use of your information.

Please contact us if you have any query or concern about our use of your information (see below 'How to contact us'). We hope we will be able to resolve any issues you may have.

You also have the right to lodge a complaint with the Information Commissioner. The Information Commissioner may be contacted at <https://ico.org.uk/make-a-complaint> or telephone: 0303 123 1113.

Changes to this privacy notice

We may change this privacy notice from time to time.

How to contact us

Please contact us if you have any questions about this privacy notice or the information we hold about you.

If you wish to contact us, please send an email to operations@slaterinvestments.com, write to: The Operations Department. Slater Investments Limited. Nicholas House, 3 Laurence Pountney Hill, London. EC4R 0EU or call 020 7220 9460.