



## **ARRACO Group GPDR, Personal Data & Cookie policy.**

We are committed to safeguarding information provided to us by any third parties including our clients, investors and all visitors ("you") to our website (the "Website") from which any individual can be identified, such as names, contact details and ID data ("Personal Information"). To the extent that any Personal Information is collected, it will be held in confidence in accordance with the Data Protection Legislation (as defined below). Please read the following Privacy and Cookies Policy which explains how we use and protect your information.

We will only use Personal Information which is provided to us, or otherwise obtained by us, as set out in this Policy. We will ensure that your Personal Information is handled in accordance with the "Data Protection Legislation" (meaning any law applicable from time to time relating to the processing of Personal Information and/or privacy as the same may be re-enacted, applied, amended, superseded, repealed, or consolidated, including without limitation, the UK Data Protection Act 1998 the General Data Protection Regulation (EU) 2016/679 (with effect from the 25th of May 2018) and the Privacy and Electronic Communications (EC Directive) Regulations 2003, in each case including any legally binding regulations, directions and orders issued from time to time under or in connection with any such law.

By visiting and/or contacting us through the Website on which you access the link to this policy or otherwise engaging with us, you acknowledge that we may collect, use and transfer your Personal Information as set out in this Policy. We reserve the right to change this Policy from time to time and you should therefore check this page frequently to ensure that you are happy with any changes.

For the purposes of the Data Protection Legislation, We are the "data controller" in respect of any Personal Information that you provide to us or we otherwise obtain about you.

### **This Privacy and Cookies Policy covers:**

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## Changes to this Privacy and Cookies Policy

### Our contact information

### Personal Information that we collect from you

When you engage with us (e.g. sending us emails, contacting us via telephone, or visiting or making an enquiry through the Website) you may provide Personal Information about yourself including your name and contact details e.g. your address, email address, and telephone number.

If you are using our services, you may also provide us with your financial information and various other necessary Personal Information. Where you make use of the Website we may also collect information about your use of the Website (e.g. your IP address and choice of web browser). Some of this Personal Information is collected and processed so we can perform a contract with you, some for the purpose of compliance with applicable legislation and some for the purposes of our legitimate business interests (namely to carry out and improve our business, analyse the use of the Website and services and support our staff and clients).

In order to comply with our legal and regulatory obligations we record calls made on certain employees' landlines and mobile telephone lines.

Where you apply for a job with us, we may collect from you and third parties, where relevant, additional Personal Information such as your CV and any references. Unless you agree that we can keep such information on file for future opportunities or we need to retain such information for compliance with our legal obligations, in the event that you are unsuccessful, we will only retain this Personal Information for as long as is reasonably necessary to process your application.

Where you provide Personal Information on behalf of another individual you are responsible for notifying that individual that you have provided their Personal Information to us and directing them to this Policy so they can see how we will process their Personal Information.

### **Personal Information that we receive from other sources**

We may receive information from third parties who collect Personal Information from you and pass it on to us. For example: (i) in connection with services that we provide to our clients; and (ii) we may receive information from past employers and others concerning your employment history where you apply for a job with us. Where this is the case the third party is responsible for informing you that they have shared your Personal Information with us, directing you to this Policy and obtaining any relevant consents from you to ensure you are happy with the ways in which your Personal Information will be used. However, once we are holding it, we will only handle any person's Personal Information in accordance with this Policy.

### **Sensitive Personal Information**

"Sensitive Personal Information" is Personal Information concerning an individual's: (i) racial or ethnic origin, (ii) political opinions, (iii) religious beliefs or other beliefs of a similar nature, (iv) membership of a trade union, (v) physical or mental health or condition, (vi) sexual life or orientation, (vii) commission or



alleged commission of any offence or any proceedings for any offence committed or alleged to have been committed by him/her, the disposal of such proceedings, or the sentence of any court in such proceedings.

Where we receive Sensitive Personal Information we will only keep such information for as long as strictly necessary in order to comply with our obligations under the law.

### **What we do with your Personal Information**

We will only use your Personal Information in order to: (a) provide you with our services on an ongoing basis, in accordance with our contract, (b) improve our Website and services, (c) comply with our own legal and regulatory obligations, including in relation to financial promotion, applicable anti-money laundering and counter terrorist financial legislation (d) for our internal business processes, including providing support to our staff and (e) where relevant, process your application for employment.

Where you have explicitly consented at the time we collected your Personal Information or where we otherwise have a right to do so, we may also use your Personal Information to let you know about any of our services that may be of interest to you and/or inform you about important changes or developments to our services by email.

Where you or your employer (or any other entity you work for) provides services to us, you and/or they may provide us with some of your Personal Information in connection with the provision of the services, such as your name, business contact details and other Personal Information. We will only process such Personal Information in connection with the provision of the services (such as using your contact details to discuss the services) and in accordance with this Policy. In addition, where necessary, we may also share your Personal Information with third parties in order to provide our services.

If you change your mind about us using your Personal Information in the ways described in this Policy, please let us know by contacting the Chairman of the data privacy forum at [GDPR@arraco.com](mailto:GDPR@arraco.com). You may also opt out of receiving marketing emails from us by following the instructions outlined in the email.

### **How we share your Personal Information**

Where it is necessary for the performance of our contract with you or for our internal business processes, we may share your Personal Information with certain third parties, professional advisors, service providers, regulatory bodies, auditors, technology providers, and any duly authorised agents or related, associated, or affiliated companies of the foregoing for the same purposes.

By submitting your Personal Information to us, you acknowledge that such third parties may receive and process your Personal Information. We ask all third parties to treat your Personal Information securely and in accordance with this Policy and will take reasonable steps to enforce this.

In addition, it may be necessary to disclose your Personal Information if we are under a duty to disclose your Personal Information in order to comply with any legal obligation (such as anti-money laundering or anti-terrorist financing obligations), carry out an internal investigation, enforce our Terms and Conditions on our Website and any other agreement, or protect the rights, property, or safety, of our companies and our clients, directors, employees, or other personnel. This includes exchanging



information with other companies and organisations for the purposes of fraud protection and prevention. They in turn may exchange information (including Personal Information and financial information) with foreign tax authorities.

In exceptional circumstances, if we are sold or merged with another company we may disclose your information to a potential buyer, including your Personal Information and other information concerning your relationship with us, so that they can continue to provide the services you have requested.

#### **Our security measures and information about when we delete data**

We will only keep your Personal Information for as long as we reasonably require and, in any event, only for as long as the Data Protection Legislation allows.

Where you have chosen a password which allows you to access certain parts of the Website, you are responsible for keeping this password confidential. We advise you not to share your password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure and, although we will take steps to protect your Personal Information, we cannot guarantee the security of your Personal Information when transmitted via the Website; any transmission is therefore at your own risk.

Some of our premises use CCTV, however, this is under the control of third parties and therefore you should consult any notices they display and their privacy statements for more information.

#### **Transferring Personal Information outside of the EEA**

Any Personal Information provided to us may be transferred to and stored on third parties' servers. We take steps to protect your Personal Information from unauthorised access and against unlawful processing, accidental loss, destruction, and damage.

In processing your Personal Information, it will sometimes be necessary for us to transfer your Personal Information outside the European Economic Area ("EEA") to our staff and our third-party service providers. It may also be accessed by staff operating outside the EEA who work for us or for one of our suppliers or group companies. This includes people engaged in, among other things, the provision of support services to us. We will take all steps reasonably necessary to ensure that your Personal Information is treated securely and in accordance with this Policy and the Data Protection Legislation when it is processed in, or otherwise accessed from, a location outside the EEA. This means that we will only transfer your Personal Information to our non-European offices and Funds, and to third parties based outside the EEA if that party: (a) is situated in a country that has been confirmed by the European Commission to provide adequate protection to Personal Information, (b) has agreed (by way of written contract incorporating the "model clauses" as approved by the European Commission or by some other form of data transfer mechanism approved by the European Commission) to provide all protections to your Personal Information as required by the Data Protection Legislation, or (c) we have your explicit consent to do so (such as where you have requested a service from one of our Funds situated outside the EEA). Where any transfer takes place under a written contract, you have the right to request a copy of that contract and may do so by contacting the Chairman of the Privacy Forum at [GDPR@arraco.com](mailto:GDPR@arraco.com).



For the avoidance of doubt, in the event that the UK is no longer a part of the EEA, references in this paragraph to the EEA shall mean the EEA and the UK.

By submitting your Personal Information to us, you acknowledge this transferring, storing, or processing of your Personal Information.

### **Accessing and updating your Personal Information**

You have the right to ask us not to process your Personal Information for marketing or research purposes. If you have given us your express consent, or where we otherwise have the right to do so, for legitimate business reasons, we may use your Personal Information for marketing purposes, where for example we may quote / distribute market prices to you.

If we intend to disclose your Personal Information to any third party for marketing purposes, we will seek your explicit consent prior to any such transfer. You can exercise your right to prevent such processing by checking certain boxes on the forms we use to collect your Personal Information.

You are entitled to know details about the Personal Information we hold about you and how that information is processed. If you would like to request this, please contact the Chairman of the Privacy Forum at [GDPR@arraco.com](mailto:GDPR@arraco.com) and we will provide you with the information to which you are entitled.

You can also ask us to: (a) make any changes to ensure that any Personal Information we hold about you is accurate and up to date; (b) erase or stop processing any Personal Information we hold about you where there is no longer a legal ground for us to hold it; or (c) in some circumstances, transfer any information we hold about you to a specified third party. If you wish to exercise any of these rights, please contact us at Chairman of the Privacy Forum at [GDPR@arraco.com](mailto:GDPR@arraco.com).

### **Complaints**

Should you have any queries or complaints in relation to how we use your Personal Information, please contact the Chairman of the Privacy Forum at [GDPR@arraco.com](mailto:GDPR@arraco.com) should you wish to take any complaints or queries further, you have the right to contact the Information Commissioner's Office regarding such issues.

Our Website may, from time to time, contain links to and from third party websites. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these websites or their related policies. Please check these policies before you submit any Personal Information via these websites.

### **Our use of cookies**

A cookie is a small file that is sent to your browser from a web server and is stored on your computer. Cookies help us to analyse web traffic and identify which pages of the Website are being used. The Website also uses cookies to respond to you as an individual so that it can tailor its operations to your needs by gathering and remembering information about your preferences as well as enabling you to login to The Website. We only use this information for statistical analysis purposes and then it is removed from our systems.



A cookie in no way gives us access to your computer or any information about you, other than information about how you use The Website and the Personal Information you choose to share with us, (including Personal Information you automatically share with us by way of your browser settings).

In particular, we use the following cookies:

**Strictly necessary cookies.** These cookies are essential in order to enable you to move around The Website and use its features, such as accessing secure areas.

**Performance cookies.** These cookies collect information about how visitors use our Website, for instance which pages visitors go to most often and if they get error messages from the web pages. These cookies don't collect information that identifies a visitor; all information these cookies collect is aggregated and is therefore anonymous. It is only used to improve how our Website works.

**Functionality cookies.** These cookies are used to identify unique visitors to websites. If you log in to the website, these are the cookies that allow us to remember who you are and what your preferences are so that we can provide you with access to pages personal to you, (for example your account pages or your selected font size). These cookies can help to keep your visit to the site secure.

**Targeting cookies.** These cookies collect information about your browsing habits to make advertising relevant to you and your interests. These cookies collect the most information about users.

**Session cookies.** These cookies allow us to identify your device as you use The Website, so that you are not treated as a new visitor each time you go to another part of The Website.

You can also find more information about cookies generally here: [www.allaboutcookies.org](http://www.allaboutcookies.org).

### **Changes to this Privacy and Cookies Policy**

We may amend this Policy at any time without notice. By continuing to use the Website and making use of our services you acknowledge that we shall process your Personal Information in accordance with the updated Policy. If you are not happy with any changes that we make, you should not use or access (or continue to use or access) the Website and/or our services. Any changes to this Policy will be posted on the Website.

### **Our contact information**

If you have any questions (including relating to transfers of your Personal Information outside the EEA), please feel free to contact us by email at: Chairman of the Privacy Forum at [GDPR@arraco.com](mailto:GDPR@arraco.com).