

CLEARBELL PRIVACY POLICY

1 Introduction

- 1.1 We take your privacy seriously. This Privacy Policy sets out details about your privacy rights and how we gather, use and share your personal data – including the personal data we already hold about you now and any further personal data we might collect about you, either from you or from a third party.
- 1.2 If you have any questions about how we use your personal data, please contact our Data Compliance Officer.

2 About us

- 2.1 When we say "Clearbell" in this Privacy Policy, we mean Clearbell Capital LLP.
- 2.2 Clearbell is a "controller" of your personal data and is referred to as 'we', 'us' or 'our' in this Privacy Policy.
- 2.3 Clearbell is registered with company number OC377251.
- 2.4 Our Data Compliance Officer is Rob Mills and he is contactable by email at robm@clearbell.com and by post at Clearbell Capital LLP, 2 Harewood Place, London W1S 1BX.

3 Your Privacy Rights

- 3.1 In addition to the right to be informed about how we use your personal data (as set out in this Privacy Policy), you have various other rights in respect of the personal data we hold about you – these are set out in more detail below. If you wish to exercise any of these rights, please contact our Data Compliance Officer:
 - **Right to object:** You can object to our processing of your personal data 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 data for direct marketing purposes. Please contact us as noted above, providing details of your objection.
 - **Access to your personal data:** You can request access to a copy of your personal data that we hold, along with information on what personal data we use, why we use it, who we share it with, how long we keep it for and whether it has been used for any automated decision-making.
 - **Right to withdraw consent:** If you have given us your consent to use your personal data, you can withdraw your consent at any time by writing to our Data Compliance Officer. Where you withdraw your consent, this will not

affect the lawfulness of our processing prior to the date on which you withdrew your consent.

- **Rectification:** You can ask us to change or complete any inaccurate or incomplete personal data held about you.
- **Erasure:** You can ask us to delete your personal data where it is no longer necessary for us to use it, you have withdrawn consent, or where we have no lawful basis for keeping it.
- **Portability:** You can ask us to provide you or a third party with some of the personal data that we hold about you in a structured, commonly used, electronic form, so it can be easily transferred.
- **Restriction:** You can ask us to restrict the personal data we use about you where you have asked for it to be erased or where you have objected to our use of it.
- **No automated decision-making:** Automated decision-making takes place when an electronic system uses personal data to make a decision without human intervention. You have the right not to be subject to automated decisions that will create legal effects or have a similar significant impact on you, unless you have given us your consent, it is necessary for a contract between you and us or is otherwise permitted by law. You also have certain rights to challenge decisions made about you. We do not currently carry out automated decision-making in relation to clients and suppliers, but we will notify you by updating this Privacy Policy if this changes.

3.2 We may need to verify your identity in order to process your request and ask you to provide valid identification documents to allow us to do so.

4 Information We Collect About You

Information we collect from you

4.1 We will collect your name and contact details (including telephone number, email address and postal address) and may collect certain financial information (including your bank account details). We may also collect non-special category personal data regarding your social life.

Information we collect from third parties

4.2 We may also collect your name and contact details (including telephone number, email address and postal address) and your education and training details from third parties such as third party database service providers, introducers or placement agents.

5 How We Use Your Personal Data and Legal Basis

- 5.1 We use personal data held about you for purposes in line with our legitimate interests to provide and improve our services, to send you news about our services and to protect and exercise our rights as a business.
- 5.2 We will also use your personal data, for example, your name, address and contact details, to carry out our contractual obligations to provide you with services and to contact you in relation to such services. Please note that where you elect to withhold personal data which is necessary for us to enter into or perform a contract with you, this might affect our ability to provide our services to you.

Anti Money Laundering/ Sanctions

- 5.3 As we are a regulated business, we are required by law to verify the identity of our clients and counter-parties and carry out Anti Money Laundering and Sanctions checks.
- 5.4 We will only process your personal data, including your name, address and identity verification documents, for the purposes of preventing money laundering or terrorist financing, as it is necessary in order to prevent unlawful acts and for the purposes of meeting regulatory requirements, with your consent, or as permitted by or under another enactment.

6 Special Categories of Personal Data

- 6.1 Special protection is given to certain kinds of personal data that is particularly sensitive. This is information about your health status, racial or ethnic origin, political views, religious or similar beliefs, sex life or sexual orientation, genetic or biometric identifiers, trade union membership ("special categories of personal data") or about your criminal convictions or offences.
- 6.2 We do not typically collect special categories of personal data. However, in the event that we do collect any special categories of personal data, we will take appropriate steps to ensure that we have explicit consent or another legal basis to hold, use and retain the information.
- 6.3 To the extent we collect special category personal data in relation to Anti Money Laundering and Sanctions checks and our legal basis for using this personal data is as set out at 5 above.

7 Disclosure of Your Personal Data

- 7.1 We may share your personal data:
- (a) with other members of the Clearbell group – for example, for administration or reporting purposes, or for marketing purposes where you have indicated that you wish to receive marketing from other group companies;

- (b) with selected third parties for the performance of our contractual obligations with you;
- (c) with banks for the purpose of payments or providing credit facilities;
- (d) with sub-contractors, advisors and auditors we may use in providing services to us;
- (e) where you have agreed to receive marketing emails from us, we need to pass your personal data on to our service providers who help us with these marketing activities;
- (f) with credit reference agencies and other background check providers for Anti Money Laundering/ Sanctions purposes.

7.2 Occasionally, we may also share personal data with relevant third parties where:

- (a) you have given us your consent to do so;
- (b) we sell or buy any business or assets or if we are under a duty to disclose or share your personal data to comply with a legal obligation or to enforce or apply contractual terms; or
- (c) it is fair and reasonable for us to do so in the circumstances.

8 Where We Store Your Personal Data

8.1 We may need to transfer your information outside the UK to service providers, agents, subcontractors and regulatory authorities in countries where data protection laws may not provide the same level of protection as those in the European Economic Area ("EEA"), such as the USA.

8.2 We will only transfer your personal data outside the EEA where either:

- (a) the transfer is to a country which the EU Commission has decided ensures an adequate level of protection for your personal data, or
- (b) we have put in place our own measures to ensure adequate security as required by data protection law. These measures include ensuring that your personal data is kept safe by carrying out strict security checks on our overseas partners and suppliers, backed by strong contractual undertakings approved by the relevant regulators such as the EU style model clauses. Some US providers may also be certified under the EU-US Privacy Shield which confirms they have appropriate measures in place to ensure the protection of your data.

8.3 If you would like further information, please contact our Data Compliance Officer.

9 Keeping You Up To Date

- 9.1 If you are a client, we may communicate relevant news and information about our services similar to those you have received or enquired about by post, email, telephone, SMS or other electronic messages, unless you tell us that you do not wish to receive them.
- 9.2 You can unsubscribe at any time by emailing or writing to our Data Compliance Officer.

10 How Long We Hold Your Personal Data

- 10.1 We will not retain your personal data for any longer than is necessary for our purposes, including for the purposes of satisfying any legal, accounting or reporting requirements. If you have any questions about data retention then please email our Data Compliance Officer.
- 10.2 Where we have been using your personal data to provide you with marketing, we will remove you from our marketing list if you ask us to do so, but we may still need to keep your information for ongoing contractual purposes if you continue to be our client and for legal, accounting and regulatory reporting reasons.

11 Right to Complain

You can make a complaint to us by contacting our Data Compliance Officer or to the data protection supervisory authority – in the UK, this is the Information Commissioner's Office, at <https://ico.org.uk/>.

12 Changes to this Privacy Policy

This Privacy Policy will be reviewed periodically and we will update it if we make any material changes to the manner in which we process and use your personal data. To the extent we make any material changes to this Privacy Policy, we will inform you by appropriate means.