

INTERNATIONAL FUND MANAGEMENT LIMITED PRIVACY NOTICE FOR WEBSITE USERS

INTRODUCTION

Welcome to International Fund Management Limited's privacy notice for website users.

International Fund Management Limited is committed to protecting the privacy and security of your personal data. This privacy notice will inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you.

1. IMPORTANT INFORMATION AND WHO WE ARE

Purpose of this privacy notice

This privacy notice aims to give you information on how the International Fund Management Limited collects and processes your personal data through your use of this website, including any data you may provide through this website when you sign up to our newsletter, request marketing materials or complete the "Contact Us" form.

This website is not intended for children and we do not knowingly collect data relating to children from our website.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them, and will be amended via this website on a needs basis.

Controller

This privacy notice is issued on behalf of International Fund Management Limited and is the controller of personal data you may input to this website and is responsible for this website.

We have appointed a data privacy manager who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the data privacy manager using the details set out below.

Contact details

Our full details are:

Full name of legal entity: International Fund Management Limited

Data Privacy Manager Email address: DPM.IFM.Guernsey@praxisifm.com

Postal address: International Fund Management Limited, PO Box 296, Sarnia House,
Le Truchot, St Peter Port, Guernsey, GY1 4NA

Telephone number: +44 (0) 1481 737600

If you are unhappy with our treatment of your personal data, you have the right to complain at any time to the Office of the Data Protection Commissioner (**DPC**), the supervisory authority for data protection issues for Guernsey (www.dataci.gg) or the equivalent authority in your jurisdiction. We would, however, appreciate the chance to deal with your concerns before you approach the DPC so please contact us in the first instance.

Your duty to inform us of changes

It is important that any personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

Third-party links

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

2. THE DATA WE COLLECT ABOUT YOU

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data that has been made anonymous.

From this website, we may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Personal Details** includes full name, previous name (including maiden or former names), and title.
- **Contact Data** includes email address.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
- **Usage Data** includes information about how you use our website, products and services.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

If you supply us with any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, political opinions, trade union membership or criminal data) we will process this in accordance with our data protection policy, and may additionally seek your consent to process this data on a needs basis. We do not envisage collecting any Special Categories of Personal Data

about you via this website nor do we collect any information about criminal convictions or offences via this website.

If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with services). In this case, we may have to cancel a service you have with us but we will notify you if this is the case at the time.

3. HOW IS YOUR PERSONAL DATA COLLECTED?

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Personal Details or Contact Data by filling in forms or by corresponding with us by post, telephone, email or otherwise. This includes personal data you provide when you:
 - I. apply for our services;
 - II. complete our “Contact Us” form;
 - III. enquire about or apply for employment;
 - IV. request marketing to be sent to you;
 - V. give us some feedback.

- **Automated technologies or interactions.** As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies. Cookies are text files placed on your computer to collect standard internet log information and visitor behaviour information. This information is used to track visitor use of the website and to compile statistical reports on website activity. For further information visit <http://www.aboutcookies.org> ('Cookies Data').

We may also receive Technical Data about you if you visit other websites employing our cookies. You have a right to object to any decisions based on automated processing of personal data.

- **Third parties or publicly-available sources.** We may receive personal data about you from various third parties and public sources as set out below:
 - I. Personal Details and Contact Data from other entities within the Sanne Group;
 - II. Personal Details and Contact Data from third parties including but not limited to clients, client advisors, credit reference agencies and other third parties in the course of service related activities throughout the period of providing services to you;
 - III. Technical Data from analytics providers such as Google based outside the European Union ('EU') (or jurisdictions deemed to provide an 'adequate' level of data protection);
 - IV. Personal Details or Contact Data from publicly available sources such as the corporate Registrars.

4. HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- In order to send you further information about our services.
- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

You have the right to withdraw consent to marketing at any time by contacting the data privacy manager.

Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact the data privacy manager if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a potential new customer or intermediary	(a) Personal Details (b) Contact Data	(a) Performance of a contract with you (b) Compliance with a fiduciary duty imposed by law or judgement (c) The performance of a service that benefits you (d) Necessary for our legitimate interests (when taking steps before assuming a fiduciary duty) (e) Necessary for us to satisfy our regulatory requirements
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a survey (c) Sending and receiving	(a) Personal Details (b) Contact Data (c) Profile Data (d) Marketing and Communications Data	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests and to satisfy our regulatory requirements (to keep our records updated and to study how customers use our products/services)

PRIVACY POLICY

messages from you		
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, reporting and hosting of data)	(a) Personal Details (b) Contact Data (c) Technical Data	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To process your enquiry with regard to: (a) Potential employment	a) Personal Details (b) Contact Data	(a) Performance of a contract with you (b) Necessary for our legitimate interests (for running our business to ensure the appropriate level of skill base across the Group)
To display content from external platforms	(a) Technical Data (b) Usage Data (c) Cookies Data	Necessary for our legitimate interests to facilitate better access to our services, such as by displaying our location on Google Maps
To deliver relevant website content and advertisements to you and measure, understand the effectiveness of the advertising we serve to you	(a) Personal Details (b) Contact Data (c) Profile Data (d) Usage Data (e) Marketing and Communications Data (f) Technical Data	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to improve our marketing strategy)
To enable access to external social networks and platforms	(a) Technical Data (b) Usage Data (c) Cookies Data	Necessary for our legitimate interests to enhance business communication with our customers
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical Data (b) Usage Data	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to improve our marketing strategy)
To make suggestions and recommendations to you about services that may be of interest to you	(a) Personal Details (b) Contact Data (c) Technical Data (d) Usage Data (e) Profile Data	Necessary for our legitimate interests (to develop our products/services and grow our business)

Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

Promotional offers from us

We may use your Personal Details, Contact, Technical, Usage and Profile Data for marketing purposes to form a view on which services may be relevant for you and what information may be of interest to you.

You will receive marketing communications from us if you have requested information from us or purchased services from us and, in each case, you have not opted out of receiving that marketing.

Third-party marketing

We will get your express opt-in consent before we share your personal data with any company outside the Sanne Group for marketing purposes.

Opting out

You can ask us or third parties to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by contacting us at any time.

Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly.

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to have an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact the data privacy manager.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

5. Disclosures of your personal data

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above.

- Internal Third Parties as set out in the Glossary.
- External Third Parties as set out in the Glossary.

- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

INTERNATIONAL TRANSFERS

We may share your personal data within the Sanne Group. This will involve transferring your data outside the EU.

Whenever we transfer your personal data out of the EU, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented

We will generally only transfer your personal data to countries that the European Commission has deemed to provide an 'adequate' level of protection for personal data or that the States of Deliberation of Guernsey has determined are designated jurisdictions. For further details, see European Commission: Adequacy of the protection of personal data in non-EU countries.

Where we use certain service providers, we may use standard data protection clauses approved by the European Commission which give personal data the same protection it has in Europe. For further details, see European Commission: Model contracts for the transfer of personal data to third countries.

Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US. For further details, see European Commission: EU-US Privacy Shield. Please contact the data privacy manager if you require further information on the specific mechanism used by us when transferring your personal data out of the EU.

DATA SECURITY

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

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

DATA RETENTION

How long will you use my personal data for?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

Details of retention periods for different aspects of your personal data are available in our retention policy which you can request from us by contacting the data privacy manager.

In some circumstances you can ask us to delete your data.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you. Once we have no lawful basis for processing your personal data, the data privacy manager of International Fund Management Limited will retain and securely destroy your personal information in accordance with our data retention policy and/or applicable laws and regulations.

6. YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Please see the Glossary section entitled “Your Legal Rights” to find out more about these rights:

- Right to request access to your personal data.
- Right to request correction of your personal data.
- Right to request erasure of your personal data.
- Right to object to processing of your personal data.
- Right to request restriction of processing your personal data.
- Right to request transfer of your personal data.
- Right to withdraw consent.
- Right to complain to the DPC and to appeal the outcome of your complaint.
- Right to not be subject to decisions based on automatic processing.

If you wish to exercise any of the rights set out above, please contact the data privacy manager.

No fee is usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

GLOSSARY

LAWFUL BASIS

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting the data privacy manager.

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Comply with a legal or regulatory obligation means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

THIRD PARTIES

Internal Third Parties

Other companies in the Sanne Group acting as joint controllers or processors and provide services to the Sanne Group such as HR, IT and system administration services and undertake leadership reporting. Information may also be shared with other entities in the Sanne Group where we are providing services in multiple jurisdictions in order to complete business functions and obligations.

External Third Parties

Service providers acting as processors who provide services to the Sanne Group, its clients and employees such as IT and system administration services and company registrations or agencies.

Professional advisers acting as processors or joint controllers including accountants, auditors, bankers, legal and professional advisors, lawyers, insurers, property agents, financial institutions and tax advisors who provide services to the Sanne Group, its clients and employees such as consultancy, banking, legal, intelligence, insurance and accounting services.

Regulators and other authorities acting as processors or joint controllers who require reporting of processing activities in certain circumstances.

YOUR LEGAL RIGHTS

You have the right to:

Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us. We will notify you of the identity and contact details of any person to whom we have previously disclosed your data prior to rectification.

Request data portability of your personal data. This enables you to request the transfer of your personal information to a third party.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. We will notify you of the identity and contact details of any person to whom we have previously disclosed your data prior to erasure. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to 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 as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which overrides your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it. We will notify you of the identity and contact details of any person to whom we have previously disclosed your data prior to restriction.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

Complain about how we have handled your personal data to the relevant Data Protection Commission in your jurisdiction, and appeal the outcome of your complaint.