

StoneMilliner.

## Privacy Notice

Stone Milliner Asset Management LLP and its affiliates (“Stone Milliner” “we”, “us”, “our”) is committed to protecting the privacy and security of your personal information. This Privacy Notice explains how we may utilize Personal Data in connection with your interest in our services and/or our working relationship with you in accordance with applicable laws including the General Data Protection Regulation (“GDPR”) effective as of 25 May 2018 (together “Data Protection Legislation”).

This notice applies to prospective, current and former clients, employees and contractors of Stone Milliner and/or Funds managed by us, as well as those with a general or ongoing interest in our organization. It does not form any part of a contract for services or employment.

### Stone Milliner as Data Controller

For the purposes of Data Protection Legislation Stone Milliner is a “data controller”. This means we are both responsible and accountable for how we hold and use personal data that we may have about you. Stone Milliner is made up of different legal entities. This Privacy Notice is issued on behalf of all Stone Milliner entities, and to that extent they may be considered as joint data controllers of your Personal Data.

### What is Personal Data?

“Personal Data” means any information relating to you by which you may be identifiable such as your name, contact details, job title and bank account details etc.

### Privacy Notice Amendments and Updates

We reserve the right to update this privacy notice at any time. We also may provide supplemental privacy notices on specific occasions when we are collecting or processing your Personal Data. We are required by law to notify you of this information and so therefore it is important that you read this Privacy Notice together with any other privacy notices or updates we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information.

### Principles for the Protection of your Personal Data

Stone Milliner will comply with applicable Data Protection Legislation. This says that the personal information we hold about you must be:

- Used lawfully, fairly and in a transparent way
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes
- Relevant to the purposes we have told you about and limited only to those purposes
- Accurate and kept up to date
- Kept only as long as necessary for the purposes we have told you about
- Kept securely

## **Stone Milliner - Usage of Information**

We may also collect personal information in the course of our job-related activities throughout the period of working with you.

The kinds of Personal Data we may collect include your contact details (such as your address, email address and telephone number) and information such as your job title which we may request from you. In addition, we will collect the Personal Data you choose to provide to us, e.g. if you contact us by letter, telephone, email or any other means of electronic or personal communication. We will only use your Personal Data in lawful circumstances. Most commonly in the following circumstances:

- the performance of our contractual obligations with you;
- to comply with our legal obligations;
- where you have consented for us to do so; or
- if we (or a third party) have a legitimate interest which is not overridden by your interests or fundamental rights and freedoms.

We will use your Personal Data to engage with and/or deliver relevant services to you and/or the institution you work or act for as appropriate. We may also use your Personal Data to inform you about our services, industry developments in the jurisdictions we act and any relevant marketing events.

## **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 Personal Data (or to exercise any of your other rights). This is another appropriate security measure to ensure that Personal Data is not disclosed to any person who has no right to receive it.

## **Accuracy of information**

It is important that the Personal Data we hold about you is accurate and current. Please let us know if your Personal Data changes during your relationship with us.

## **Data Processing and Consent**

We do not need your consent if we use special categories of your personal information in accordance with our written policy to carry out our legal obligations. In limited circumstances, we may approach you for but not rely on your written consent to allow us to process certain particularly sensitive data. If we do so, we will provide you with full details of the information that we would like and the reason we need it, so that you can carefully consider whether you wish to consent. You should be aware that it is not a condition of your contract with us that you agree to any request for consent from us.

## **What may happen if you do not provide the personal data we request?**

You may choose to provide or not (continue) to provide data to us. If you do not provide us with all or some of the Personal Data we request, we may not be able to fulfil our legal obligations and therefore may be unable to enter into a contractual working relationship with you, or the institution you work for, or to send you relevant information.

## **How we use sensitive personal information**

We need to have strong justifications for collecting, storing and use of sensitive Personal Data. We have in place an appropriate policy document and safeguards which we are required by law to maintain when processing such data. We may process special categories of personal information in the following circumstances:

- Where we need to carry out our legal obligations or exercise rights in connection with employment.
- Where it is needed in the public interest, such as for equal opportunities monitoring or in relation to our occupational pension scheme.

We may possibly also process this type of information where it is needed in relation to legal claims or where it is needed to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public. We may also process such information about current or former employees or candidates in the course of legitimate business activities paying due care and attention to the appropriate safeguards. Such processing will as a rule be kept to the absolute minimum.

## **Information about criminal convictions**

We may only use information relating to criminal convictions where the law allows us to do so. This will usually be where such processing is necessary to carry out our obligations and provided we do so in line with our data protection policy.

Less commonly, we may use information relating to criminal convictions where it is necessary in relation to legal claims, where it is necessary to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public.

We may also process such information about members or former members in the course of legitimate business activities with the appropriate safeguards.

We will only collect information about criminal convictions if it is appropriate given our regulatory obligations, the nature of the role, and where we are legally able to do so. Where appropriate, we will collect information about criminal convictions as part of the recruitment process and we may be notified of such information directly by you in the course of you working for us.

We have in place an appropriate internal policies and safeguards which we are required by law to maintain when processing such data.

## **Change of purpose and anonymisation**

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 which is compatible with the original purpose. 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. In some circumstances we may anonymise your Personal Data so that it can no longer be associated with you, in which case it is no longer Personal Data.

## **With whom will we share your information?**

When using your Personal Data for the purposes and on the legal basis described above we may share your Personal Data amongst Stone Milliner entities and with service providers we work with. We may also, as a matter of law, have to share your Personal Data with regulators, public institutions, courts or other third parties.

For the purposes described above we may have to transfer your Personal Data cross-border to a Stone Milliner office or a third party. We will always ensure that there is a legal basis and a relevant safeguard method for such cross-border data transfer so that your Personal Data is treated in a manner that is consistent with, and respects the EU laws and other applicable laws and regulations on data protection.

## **Automated Decision Making**

You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making, unless we have a lawful basis for doing so and we have notified you.

We do not envisage that any decisions will be taken about you using automated means, however we will notify you in writing if this position changes.

Your rights in relation to your information

You have rights as an individual which you can exercise under certain circumstances in relation to your Personal Data that we hold. These rights are to:

- request access to your Personal Data (commonly known as a “data subject access request”) and request certain information in relation to its processing;
- request rectification of your Personal Data;
- request the erasure of your Personal Data;
- object to the processing of your Personal Data.

If you want to exercise one of these rights please contact us at [privacy@stonemilliner.com](mailto:privacy@stonemilliner.com).

You also have the right to make a complaint at any time to the Information Commissioner’s Office (ICO), the UK supervisory authority for data protection issues, or, as the case may be, any other competent supervisory authority.

## **Right to withdraw consent**

Even if you have provided your consent to the collection, processing and transfer of your Personal Data, you have the right to fully or partially withdraw your consent. If you wish to do so please contact [privacy@stonemilliner.com](mailto:privacy@stonemilliner.com). Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose(s) to which you originally consented unless there are compelling legitimate grounds for further processing which override your interests, rights and freedoms or for the establishment, exercise or defence of legal claims.

## **How long will we retain your information?**

We will only retain your Personal Data for as long as necessary to fulfil the purposes for which it was collected and processed, including for the purposes of satisfying any legal, regulatory, accounting or reporting requirements.

To determine the appropriate retention period for your Personal Data, we will 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.

In some circumstances we may anonymise your Personal Data so that it can no longer be associated with you, in which case it is no longer Personal Data.

Upon expiry of the applicable retention period we will securely destroy your Personal Data in accordance with applicable laws and regulations.

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## **Fees**

You will in general not have to pay a fee to exercise any of your individual rights mentioned in this Privacy Notice. However, we may charge a reasonable fee if your request to exercise your individual rights is manifestly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

## **Further information**

If you have any questions regarding the contents of this Privacy Notice or require any further information, please do not hesitate to contact [privacy@stonemilliner.com](mailto:privacy@stonemilliner.com).