

General Privacy Policy

Equitile Investments Ltd ("Equitile") and its appointees and employees take the protection of your personal information and your privacy very seriously and are committed to treating your data in compliance with the applicable laws and regulations. This policy underpins our approach to respecting your privacy and details the types of personal information we collect, the basis on which we do so, how we process, disclose and protect your personal data.

For the purposes of the Data Protection Act 1998 and the EU General Data Protection Regulation, Equitile Investments Ltd (a company registered in England and Wales, registration number 09459099 with registered office at Bridge House, 4 Borough High Street, London SE1 9QR) is the data controller in respect of the Equitile website (www.equitile.com).

By using the Equitile website or by providing us with your details directly (for example, by providing us with a business card), you are consenting to Equitile collecting, using and disclosing your personal information in accordance with this privacy policy.

If you do not agree to the collection, use and disclosure of your personal information in this way, please do not use the Equitile website or provide us with your personal information.

Equitile is an investment management company and the contents of its website are designed and intended for use by adults. If you are a child under the age of consent you should review the terms of this privacy policy with your parent or guardian to make sure you understand and accept them. If we discover that we have collected information from a child without consent from a parent or a guardian where such consent should have been obtained, we delete that information as soon as possible.

This privacy policy is hereby incorporated into and forms part of the terms and conditions of use of Equitile website and details the following:

1. What information do we collect?

In this policy, your "personal information" means information or pieces of information that could lead to your identification. When you fill out the subscription form, or provide us with your consent whether verbal or written to receive Equitile or Equitile Funds' related information and updates we collect limited information such as your name and email address. We also use Google analytics to get limited details of your visit to the website including but not limited to, traffic data and location data. We do not use any cookies other than Google analytics and do not store the details of your IP address. If you contact us we will keep a record of that correspondence.

2. How do we use your personal information?

Where you have explicitly consented either verbally, in writing or by subscribing through our website in order to receive Equitile news, information and updates, we may use the data that we have collected, or otherwise where we have the right to do so, we may use your information to let you know about our products and services that might be of interest to you and to inform you of any changes or developments as well as sending out investment related newsletters and reports. We will only ever do so using emails unless you specifically request us to contact you by any other means including telephone, post etc. Should you no longer wish that we continue using your data in such a way, please contact us as per the details provided below.

3. Who do we share your personal information with?

We disclose your personal information to such employees or appointees of Equitile to the extent that it is necessary to enable us to provide you with the services as described above. Where we are obliged to disclose or share your personal data to comply with any legal or regulatory reasons, we may do so without your consent. In case of a reorganisation or sale of the Company the data may be transferred to such entity and will be continued to be used as described above.

4. Transferring your personal information

We reserve the right to transfer your personal information to servers located outside the EEA so they may process your personal information on our behalf. If you use Equitile website or provide us with your personal

information, you agree to us in doing so in accordance with the terms of this policy and applicable data protection laws and regulations.

You should be aware that many countries do not afford the same legal protection that you might enjoy in your country of origin. However, outside of any lawful requests to access your data by any legal or supervisory bodies, we confirm that anyone processing your personal information outside your country of origin is required to implement measures to protect it and is only entitled to process it in accordance with Equitile's instructions.

5. Safeguarding your personal information

We take all reasonable endeavours to ensure that your personal information is secure and require any third parties that handle or process your data to do the same. Access to your personal information is restricted on a need to know basis among Equitile employees and appointees and is designed to prevent unauthorised access, modification or misuse.

6. Your privacy rights and who to contact

If you have any questions, comments or concerns about Equitile's handling of your personal data, you may contact us by email at info@equitile.com, by writing to us directly at our business address Equitile Investments Ltd, 20 St Dunstan's Hill, London EC3R 8ND or by calling us at +44(0)203 397 7701. Your request will be welcome and promptly directed to the appropriate representative of Equitile who will respond within 72 hours from the receipt of the request. To expedite any such requests please provide us with your full name and email. You can

You have the right to tell us if:

- You do not wish for us to contact you in future
- You would like to know the details of personal information we hold on you
- You would like us to correct, update or delete your personal information held in our records
- You wish to report any misuse of your personal information

You may also ask us for access to inspect and update your personal information. We will provide you access within 4 weeks from when the request is received. You can ask us to make any changes to ensure that any information we hold about you is accurate and up to date, to erase or stop processing any personal information we hold about you where there is no longer a legal ground for us to hold it and where applicable, transfer information we hold to a third party specified by you. You retain the right to complain to the ICO if we disagree with your request that your data should be removed or rectified.

7. Changes to our privacy policy

We may change the details of this policy from time to time by posting updated version of this policy on Equitile website. We will provide you with reasonable notice of any material changes and we encourage you to frequently visit to stay up-to-date with how we use your personal information.

8. Other Equitile privacy policies

In addition to this privacy policy, Equitile may process additional information provided to us by our investors. This is detailed in our application form and investor notices and can be made available on demand.