

Investor Data 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), and Equitile Funds are the data controllers in respect of the personal data provided by Equitile Investors. Equitile Investments Ltd is the data controller in respect of personal data provided by any business contacts, including financial advisors.

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

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.

1. What information do we collect from you or from other sources?

In this policy, your “personal information” means information or pieces of information that could lead to your identification. When you fill out the application form to invest into the Equitile Fund or otherwise engage with us (through email, phone call, in person or making a transaction with us), you provide us with your personal information (this would typically include your name, contact details, address, email), your financial information and various other necessary information to complete your investment (for example, id documents, date of birth, tax identification number(s) and bank details).

We may receive the above described information from third parties for example, your wealth or financial advisor in order to comply with our anti-money-laundering requirements. The third party in this case will be the data controller but the information received by us will only be used as per the terms of this policy.

2. How do we use your personal information?

We are required to describe the lawful basis under which we hold and process your personal information. Your personal information will broadly be collected so either we can perform a contract with you, for legal and regulatory compliance or some will be for the purposes of our legitimate business interests (such as to carry out and improve our business and to support our investors). Where you have consented to receiving 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 however, you should note that we are required by law to retain some of your personal information in relation to your investment.

With respect to our investors personal information we will use your information to:

- manage and administer your share/unit holding;
- to inform you of any fund related news or of changes to the fund;
- comply with our legal and/or regulatory requirements; and
- to identify you.

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 and to meet our legal and regulatory requirements (for example for anti-money-laundering measures, fraud prevention etc). 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. We may also share your information with your financial advisor where you have appointed one. You are required to update us if you no longer use the services of such advisor.

We may also share your personal information with third parties including fund administrator (HSBC Bank Plc) and application service provider (ASP) that the management company use in order to fulfil their role. The ASP may make use of cloud based infrastructure and storage.. When you submit your information to us you consent to us sharing your information in such manner.

All third parties are required by us to treat your personal information securely and their treatment of your data is in accordance with the terms outlined in this policy.

4. What is sensitive personal information?

Sensitive personal information is described as personal information concerning an individual's

- commission or alleged commission by him/her of any offence, or
- involvement in 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.racial or ethnic origin,
- political opinions,
- religious beliefs or other beliefs of a similar nature,
- membership of a trade union,
- physical or mental health or condition,
- sexual life or orientation,

You may provide us with applicable sensitive personal information from time to time which is in connection with your application or otherwise. In such cases, the provision of this information is entirely voluntary and subject to your express consent. However, we may be unable to carry out some activities necessary to process your application, instructions or other requests without the provision of such information. Where we do 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.

5. Transferring your personal information

We may transfer your personal information to servers located outside the EU and EEA so the ASP may process your personal information on our behalf. If you provide us with your personal information, you agree to us doing so in accordance with the terms of this policy and applicable data protection laws and regulations. Your personal information may also be transferred to countries outside the EU and EEA where our suppliers and or other service providers are located outside these jurisdictions. Your personal information may also be accessed by an Equitile appointee or employee or by the staff of our suppliers (HSBC Bank Plc) or service providers who might be operating outside the EU and EEA and they may need to access your personal information to provide us with their services.

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. This means that we will only transfer the data outside the EU and EEA to the third parties if:

- such third party is situated in a country that has been confirmed by the European Commission to provide adequate protection to personal information;
- such data transfer is under the terms of a written contract or some other data transfer mechanism carried out in accordance with the rules and regulations of the European Commission.
- Where we have your explicit consent (such as in case of transfer requested by you).

You have a right to request us for information regarding the specific terms affecting your rights whereby we have transferred your personal information under a contract. You may do so by contacting us as per the contact details provided below.

6. 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.

7. 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 promptly directed to the appropriate representative of Equitile and you will receive a response within 72 hours. To expedite any such requests please provide us with your full name and email.

You have the right to ask us not to process your personal information for marketing purposes and you can contact us any time 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 for the purpose of marketing 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.

8. Changes to our investor data privacy policy

We may change the details of this policy from time to time by posting updated version of this policy on Equitile website (Equitile.com). 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.

9. Other Equitile privacy policies

In addition to this privacy policy, Equitile may process additional information provided to us by our website users. This is detailed on our website and can be made available on demand.

Last updated: May 2018