



## **Privacy Statement**

### **Privacy Statement for the Traderight Limited website and Client Portal ("Privacy Statement")**

Valid as of 10 July 2018

#### **1 Introduction**

We are Traderight Limited ('Traderight', 'we', 'our', 'us') and our registered office is at 35 New Bridge Street, London, EC4V 6BW. Our company number is 03388433.

We are keen to protect the reasonable expectations of privacy of the visitors to this website as well as the privacy of other individuals whose personal data we handle in discharging our commercial activities. Those individuals could include individual investors in funds for which we act as investment manager ("Funds"), trustees of pension fund investors in Funds, ultimate beneficial owners of investments in Funds, as well as other clients, or their representatives, agents or appointees, or an employee, director, officer or representative of another organisation with which we have a business relationship ("you" or "your").

For the purposes of Data Protection Legislation, we are data controllers of your personal data.

In this Privacy Statement:

- (a) your personal information is sometimes called "personal data" which is any information from which you can be identified e.g. your name, email address etc. We may also sometimes collectively refer to handling, collecting, protecting and storing your personal data as "processing" such personal data; and
- (b) "Data Protection Legislation" means the EU General Data Protection Regulation 2016/679; together with all other applicable legislation relating to privacy or data protection.

We operate and administer the website at <http://www.traderightuk.com> or any succeeding website address ("Site").

You do not need to submit any personal information to us but we may be unable to provide certain products and services or proceed with your business relationship with Traderight if you do not do so.

If you decide to register as a user of the Traderight Client Portal to obtain additional services which are available to registered users, please read this Privacy Statement before you submit your personal information to us.

This Privacy Statement may be updated from time to time. The date of the most recent revisions will appear on this page so please visit this Privacy Statement each time before you submit your personal information.

## **2 What personal information do we collect from you?**

We collect personal information from you when you register to use the Traderight Client Portal, this information can include your:

- (a) Name;
- (b) Contact information such as your email address and telephone number;
- (c) IP address, your browser type and language;
- (d) Information about your visit to our website, including the full Uniform Resource Locators (URL), clickstream to, through and from our site (including date and time), length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs) and methods used to browse away from the page.

In addition, many of our services require us to obtain and process personal data in order to provide the products and services which we have been engaged to provide. In discharging our services we may process the following categories of your personal data:

- (a) information obtained from identification documentation (including your name, contact details, nationality and national identify numbers (where applicable));
- (b) your professional title and occupation;
- (c) your age and marital status;
- (d) financial information, tax status, account details and evidence of ownership of financial assets;
- (e) personal identifiers such as your social security number, national insurance number, tax file number, IP address or our internal electronic identifiers;
- (f) information which we or our service providers need to conduct 'know your client' checks such as details relating to your passport and credit history;
- (g) files that we may produce as a record of our relationship with our clients and prospective clients, including contact history;
- (h) any personal data that you provide during telephone and email communications with us which we may monitor and record in order to resolve complaints, improve our service and in order to comply with our legal and regulatory requirements;
- (i) other information you provide in the course of your dealings with us or which they each require to provide you with products and services.

## **3 How do we collect your personal data?**

We collect personal information from you when you register as a user or the Traderight Client Portal or otherwise use our Site.

We also collect and store personal data that you otherwise provide to us in the course of any business relationship you may have with us. The nature of our relationship with you will determine what information it is necessary to provide us with.

Your personal information may be provided from other sources including from:

- (a) publicly available sources, including third party agencies such as credit reference agencies; fraud prevention agencies; law enforcement agencies; public databases, registers and records such as Companies House and the FCA Register; and other publicly accessible sources;
- (b) Funds, in accordance with Data Protection Legislation;
- (c) independent financial advisors, other professional advisers, product providers, events organisers, and other agents and/or representatives in accordance with Data Protection Legislation; and
- (d) information obtained from sanctions checking and background screening providers.

#### **4 What do we do with your personal information?**

Our primary purpose of processing collecting and processing your personal information is to properly discharge our professional duties and to off our bespoke and discreet execution service.

Additionally, we use your information for the following specific purposes:

- (a) to allow clients to use and access our products and services;
- (b) to set up / onboard prospective clients;
- (c) to process transactions;
- (d) to disclose information to other third parties such as service providers of the Funds, auditors, regulatory authorities and technology providers;
- (e) to keep our records up to date;
- (f) to monitor IT systems in order to protect against cyber threats or malicious activity including abuse and misuse;
- (g) to administer or maintain IT systems in order to uphold standards of service;
- (h) to effectively manage and strengthen client and prospective client relationships, understand client and prospective client needs and interests and learn more about our clients and prospective clients in order to develop, improve and manage the products and services we can offer;
- (i) to administer the day to day managing of Funds;
- (j) for the management and administration of our business;
- (k) in order to comply with and in order to assess compliance with applicable laws, rules and regulations, and internal policies and procedures

When you register to use the Traderight Client Portal, your personal data will be used to provide you with news, updates relating to your account(s), commentaries, research reports and other information, provide you with password reminders and contact you with any other information pertaining to your relationship with Traderight.

## **5 Legal grounds for using your personal information**

Data Protection Legislation permits us to process your personal data in the way that it does because the processing is:

- (a) necessary for the purposes of the legitimate interests that we pursue, which are to run and administer the operation of our business, to discharge our legal obligations, to store and disclose information where necessary and to evaluate, develop and improve our services;
- (b) necessary for the performance of a contract with you; or
- (c) necessary in order to comply with a legal obligation to which we are subject.

To the extent that we process any special categories of data relating to you for any of the purposes outlined above, we will do so because either: (i) you have given us your explicit consent to process that personal data; (ii) you have made the personal data manifestly public; or (iii) the processing is necessary for the establishment, exercise or defence of legal claims.

## **6 Who do we pass your personal information to?**

With regards to the personal data we process in connection with using the Site we will only disclose any personal information you submit to us to third parties if this is required for the purposes of service administration to enable us to maintain and operate the Site as well as to collect traffic data.

Otherwise and in connection with providing our services we may share your personal data following categories of recipients may receive your personal information and process it for the purposes outlined in this Privacy Statement

- (a) with representatives, agents, custodians, administrators, intermediaries and/or other third party product providers appointed by a Fund or other client (such as accountants, professional advisors, custody service providers and product providers);
- (b) third party agents and contractors for the purposes of them providing services to us, Funds or other clients (for example, our accountants, professional advisors, IT and communications providers, background screening providers, credit reference agencies and debt collectors);
- (c) with any depository, [stock exchange,] clearing or settlement system, counterparties, dealers and others where disclosure of your personal data is reasonably intended for the purpose of effecting, managing or reporting transactions;

- (d) where you are a joint account or portfolio holder (or otherwise one of multiple persons holding an account or portfolio), we may disclose your personal data to the other joint account or portfolio holder or other person;
- (e) any regulatory, supervisory or governmental authorities to the extent we are required by law to do so, or in other limited circumstances (for example if required by a court order or regulatory authority, or if we believe that such action is necessary to prevent fraud);
- (f) other third parties for those purposes that may be reasonably ascertained from the circumstances in which the information was submitted;
- (g) other business entities should we plan to merge with or be acquired by that business entity, or if we undergo a re-organisation with that entity; and
- (h) any successor in interest, in the event of a liquidation or administration of Traderight.

## **7 Transferring data outside of the EEA**

Personal data may be transferred to, and stored at, a destination outside the European Economic Area ("EEA") or to countries not regarded by the European Commission as providing an adequate level of data protection. When we, or our permitted third parties, transfer personal information in this manner will ensure that the transfer is subject to appropriate safeguards in accordance with Data Protection Legislation.

## **8 How long we keep your information**

We will only keep the information we collect about you for as long as required for the purposes set out in this Privacy Statement or as required to comply with any legal obligations to which we are subject being the longest of the following periods:

- (a) a minimum of six years;
- (b) as long as is necessary for the purpose for which we are using it (described in this Privacy Statement);
- (c) the length of time it is reasonable to keep records to demonstrate compliance with professional or legal obligations;
- (d) any retention period that is required by law; or
- (e) the end of the period in which litigation or investigations might arise.

This will involve us regularly reviewing our files to check that information is accurate, up-to-date and still required.

## **9 How we protect your information**

We take your online security seriously and have implemented generally accepted standards of technology and operational security to protect your personal information from loss, misuse, alteration or destruction. Once we have received your information we will ensure that the collection and use of your information is in accordance with

Data Protection Legislation. All personnel of Traderight are required to keep personal information confidential and only authorised persons have access to such information.

Please note, however, that the transmission of information via the Internet is not completely secure and we cannot guarantee the security of your personal information transmitted to us or provided through the Site.

## **10 Linking to other websites**

The Site contains hyperlinks to websites owned and operated by third parties. These websites have their own privacy policies and we urge you to review them as these policies are not our responsibility. They will govern the use of personal information you submit whilst visiting these websites. We do not accept any responsibility or liability for the privacy practices of such third party websites and your use of such websites is at your own risk.

## **11 IP Addresses**

We study visitor trends since we are interested in the successful dissemination of information through the Site. Our server creates log files of information such as the Internet Protocol (IP) address from your network, what pages were explored and the length of your visit. Analysis software is used to generate reports which help us to learn more about how we can enhance your experience with the Site. This information is not used to develop a personal profile of you. The log files are regularly purged.

An IP address is a number designated for your computer by your Internet service provider to provide access to the Internet. Generally, an IP address will change every time your computer connects to the Internet. However, if you have a broadband connection, it is possible that the IP address that we may gather may contain information that may be deemed identifiable. This could occur due to the fact that by using certain broadband connections, your IP address would not change and could be associated with your personal computer. We may use your IP address to gather aggregate information on use. But we will only be able to identify you individually if we have the means of linking to the IP address to you as a particular user. This usually requires access to additional information which we do not seek.

## **12 Automated processing**

We do not carry out automated decision-making or profiling.

## **13 Your rights**

At any time, you have the right:

- (a) to be informed about the processing of your personal data (i.e. for what purposes, what types, to what recipients it is disclosed, storage periods, any third party sources from it was obtained, confirmation of whether we undertake automated decision-making, including profiling, and the logic, significance and envisaged consequences);
- (b) to request access to or a copy of any personal data which we hold about you;
- (c) to rectification of your personal data, if you consider that it is inaccurate;

- (d) to ask us to delete your personal data, if you consider that we do not have the right to hold it;
- (e) to withdraw consent to our processing of your personal data (to the extent such processing is based on previously obtained consent);
- (f) to ask us to stop or start sending you marketing messages (e.g. our newsletter) at any time by using the below contact details;
- (g) to restrict processing of your personal data;
- (h) to data portability (moving some of your personal data elsewhere) in certain circumstances;
- (i) to object to your personal data being processed in certain circumstances; and
- (j) to not to be subject to a decision based on automated processing and to have safeguards put in place if you are being profiled based on your personal data.

Any request to exercise these rights should be addressed to the compliance department by email: [compliance@traderightuk.com](mailto:compliance@traderightuk.com). We will use reasonable efforts to supply, correct or delete personal information that we hold about you.

Any request for access to or a copy of your personal data must be in writing, again addressed to [compliance@traderightuk.com](mailto:compliance@traderightuk.com), and we will endeavour to respond within a reasonable period and in any event within one month in compliance with Data Protection Legislation. We will comply with our legal obligations as regards your rights as a data subject.

We will correct any incorrect or incomplete information and will stop processing your personal data, or erase it, where there is no legal reason for us to continue to hold or use that information.

We aim to ensure that the information we hold about you is accurate at all times. To assist us in ensuring that your information is up to date, do let us know if any of your personal details change.

## **14 Other**

This Privacy Statement is for your information and should not be used as the basis for any decision to purchase or redeem investments. The views and information expressed in this Privacy Statement do not constitute and may not be relied upon as constituting any form of investment advice or inducement to invest, and prospective investors must obtain appropriate independent professional advice before making investment decisions.

## **15 Cookies**

### **Our use of cookies**

Traderight set and access cookies and similar technology on your device to obtain information about how you access and use the Site. This helps us to provide you with a good experience and allows us to improve the Site. Unless you have adjusted your

browser settings so that it will refuse cookies, the Site will set cookies when you load and navigate them.

### **What are cookies?**

Cookies are text files containing small amounts of information which are downloaded to your device when you visit a Site. Cookies are then sent back to the originating Site during your browsing session or on each subsequent visit, or to another Site that recognises that cookie. The cookies we set do lots of different jobs, like help us to improve the Site and deliver a better and more personalised service, remember your preferences, and generally improve the user experience. You can find more information about cookies at <http://www.allaboutcookies.org/>.

Cookies can be categorised in accordance with the categories found in the ICC UK cookie guide as set out below:

- (a) Strictly necessary cookies – these cookies are essential in order to enable you to move around a Site and use its features and enable services you have specifically asked for. Consent is not generally required for these cookies.
- (b) Performance cookies – these cookies collect information about how visitors use a Site (for example, by recording which pages or features visitors use most often (usually on an anonymous basis)).
- (c) Functionality cookies - these cookies allow a Site to remember the choices a user makes, such as a user name or language preference.
- (d) Targeting or advertising cookies - these cookies collect information about a user's browsing habits and are usually placed by advertising networks with the Site operator's permission.

### **Refusing or restricting cookies**

You may refuse to accept cookies by activating the setting on your browser which allows you to refuse the setting of cookies. The "Help" or "Internet Settings" functions within your browser should tell you how. Alternatively, you may wish to visit <http://www.allaboutcookies.org/> which contains detailed information on cookies and how to delete, restrict or block them on a wide variety of browsers. For information on how to do this on the browser of your mobile phone you will need to refer to your handset manual.

Please be aware that if you select to refuse or restrict cookies you may be unable to access certain parts of the Site.

## **16 Contacting us**

Questions, comments and requests regarding this Privacy Statement are welcomed and should be addressed to [compliance@traderightuk.com](mailto:compliance@traderightuk.com). You may also use these contact details if you wish to make a complaint to us relating to your privacy.

If you have any concerns about our use of your information, you also have the right (as a UK resident) to make a complaint to the Information Commissioner's Office,

which regulates and supervises the use of personal data in the UK, via their helpline on 0303 123 1113.