

Privacy Notice

Introduction and Purpose

The General Data Protection Regulation (“GDPR”) governs the controlling and processing, such as the use or holding, of personal data, which is essentially any information about identifiable living individuals, and also gives those individuals certain rights and remedies in respect of that information.

The purpose of this notice is to supply you with the required information at the time of providing us with your personal data. This will lay out the essentials such as the what; where; when; and how in relation to the personal information collected. This should help you feel more confident about the privacy and the security of your personal information. We want to give you comfort that we are not in the business of selling personal information to other businesses.

Please read this Privacy Notice carefully. By visiting our website or using any of our services, you indicate your agreement to our use of your personal information as set out in this Privacy Notice.

Identity and contact details of the Data Controller

Cederberg Capital Limited, company number 07793176 (“Cederberg”) whose registered office is at 26 Throgmorton Street, London, EC2N 2AN is the Data Controller and is committed to protecting the rights of individuals in line with the GDPR.

Information we collect about you

When do we collect information?

We will collect information from you when you register with us, apply to use any of our services, become our client, or contact us in person, by telephone, by email or by post. We also collect information from you when you provide feedback or complete a contact form on our website.

We, or more often our fund administrator, may collect information about you from fraud prevention agencies and other organisations when we undertake checks such as identification verification checks, as explained further below.

Information may also be collected about you when you visit our website (for example via cookies), such as your IP address and other browser-generated information. More information about this can be found in our Cookie Policy in Appendix A.

What information will we collect and why?

We may collect the following information depending on the service provided:

- Your contact details, such as your name, address, telephone number and email address;
- Your date of birth, nationality, country of birth, country of residence, employment status and tax identification number (e.g. National Insurance Number);
- Passport details, driving licence and utility bills;
- Details of the services you request from us;
- Any records held by financial crime prevention agencies, on the Electoral Register and by providers of utility services

In some cases, you are not obliged to provide any personal data to us, but if you have requested information or a service from us, we will not be able to provide it without certain information, such as your contact details. Before we can begin providing you with our services, we need to obtain certain information about you, so that we, or the fund administrator can verify your identity in order for us to meet our obligations under the Money Laundering, Terrorist Financing and Transfer of Funds Regulations 2017 and any other applicable legislation and for the purposes of crime prevention and fraud prevention. **You are obliged to provide this information and if you do not provide it, we will be unable to provide you with our services.**

We also collect information from you when you voluntarily complete customer surveys, provide feedback or complete a contact form on our website.

Automated Processing

Cederberg does not make use of automated processing or decision making.

How will we use your information?

We use information held by you in the following ways:

- To process your application to use our services;
- To undertake checks (usually with the help of our administrator) such as identification verification checks with fraud prevention agencies to enable us to comply with our anti-money laundering obligations and for the purposes of crime prevention and fraud prevention;
- To comply with our obligations arising from any contracts entered into between you and us and to provide you with the information, products and services that you request from us;
- To help protect your information and prevent unauthorised access to it;
- To deal with any queries, complaints or problems reported by you;
- To generate statistics relating to use of our website, such as the popularity of certain features or services. We do not use personally identifiable information for these purposes;
- To provide you with information about other services we offer that are similar to those that you have already engaged us to provide or enquired about. In such instances Cederberg will only do so where we have received explicit consent from you to do and for each separate method of communication. **You may opt out of receiving this information when we collect details or at any time by contacting us using the contact details below;**
- if required to do so by law and to the extent necessary for the proper operation of our systems, to protect us/our customers, or for the enforcement of any agreement between you and us;
- to notify you of changes to our services; and
- to help improve the services we provide to you.

How will we protect your information?

We take appropriate security measures (including physical, electronic and procedural measures) to help protect the confidentiality, integrity and availability of your personal information from unauthorised access and disclosure.

Who would we disclose your information to?

We may disclose your information to:

- Businesses that are legally part of the same group of companies within Cederberg, or that become part of that group;
- Our service providers, only if necessary to provide and maintain the provision of the services;
- Our appointed auditors, accountants, lawyers and other professional advisers (e.g. compliance consultants), to the extent that they require access to the information in order to advise us;
- Fraud prevention agencies and other organisations to allow us to undertake the checks set out below. We will supply details of such agencies on request;
- The regulators, the Financial Conduct Authority, or any relevant regulatory authority where they are entitled to require disclosure;
- Meet applicable law, the order of a Court or market rules and codes of practice applicable to the circumstances at the time;
- Investigate or prevent fraud or activities believed to be illegal or otherwise in breach of applicable law;
- Relevant tax, payments and customs authority, who may pass this on to tax authorities in other jurisdictions. Tax regulations require us to collect information about each investor's tax residency;

Please note we will not lend or sell your information to third parties.

Data retention

We are committed to only keeping your personal data for as long as we need to in order to fulfil the relevant purpose(s) it was collected for, as set out above in this notice, and for as long as we are required or permitted to keep it by law.

We retain copies of our customer contracts in order to enable us to deal with any legal issues and the information provided to us for identification verification checks, financial crime and anti-money laundering checks (as required by law) for 5 years after termination or expiry of our contract with you. We retain details of complaints for 5 years from the date of receipt.

We shall keep records of the following for 5 years:

- call recordings, electronic communications and minutes of face-to-face meetings;
- suitability and appropriateness assessments;
- periodic statements (for example, valuations); and
- all orders and transactions in financial instruments on your behalf (including information about your identity).

Cederberg retain copies of all records aforementioned for a maximum of 7 years.

Transferring information overseas

We may share your personal information with our service providers (e.g. banks and custodians may require information relating to certain employees) of and this may involve transferring it to countries outside the European Economic Area (EEA) whose data protection laws may not be as extensive as those which apply to us. Where we do so, we will take all reasonable steps to ensure that we do this in accordance with the Acts and take appropriate measures to ensure that the level of protection which applies to your personal information processed in these countries is similar to that which applies within the EEA.

Your rights

You have a key right to learn and have access to what personal information is held by Cederberg and able to ask us for details on this.

When we receive such a request we will endeavour to provide you with these details without delay and at the latest within one month of receipt. We may extend the period of compliance by a further two months where requests are complex or numerous. In such instances Cederberg will inform you within one month of the receipt of the request and explain why the extension is necessary.

When Cederberg receives a subject access request we will provide a copy of the information held free of charge. We may charge a reasonable fee to comply with requests for further copies of the same information. This does not mean that we will charge for all subsequent access requests rather that the Cederberg reserves the right to charge a fee based on the administrative cost of providing the information.

If the after reviewing a request Management believe a request is manifestly unfounded or excessive, particularly if it is repetitive, then Cederberg may charge a 'reasonable fee' which will be decided on a case by case basis. In certain circumstances Cederberg may even refuse to respond to such requests.

You also have the following rights (unless exemptions apply), which can be exercised by contacting us using the details provided below.

The right:

- To ask us not to process your personal data for marketing purposes;
- To prevent any processing of personal data that is causing or is likely to cause unwarranted and substantial damage or distress to you or another individual;
- To request the rectification or completion of personal data which are inaccurate or incomplete;
- To restrict or object to the processing of your personal data (from 25th May 2018 onwards);
- To request its erasure under certain circumstances;
- In certain circumstances, to receive your personal data, which you have provided to us, in a structured, commonly-used and machine-readable format and the right to transmit that data to another data controller without hindrance, or to have that personal data

transmitted to another data controller, where technically feasible (from 25th May 2018 onwards);

- To be informed about any use of your personal data to make automated decisions about you, and to obtain meaningful information about the logic involved, as well as the significance and the envisaged consequences of this processing; and
- To lodge a complaint about the way in which your personal data is being used to your Data Protection Authority: The Information Commissioner's Office (United Kingdom).

When you contact us to exercise any of the rights above, we may ask you to provide some additional information in order to verify your identity, such as your name, your address and proof of identity.

If you would like to lodge a complaint or exercise any of your rights set out above, you can contact us at:

E-mail: info@cederbergcap.com

Post: United Kingdom: Compliance Officer, 25 Throgmorton Street, London, EC2N 2AN

Alternatively, if you would like to contact your Data Protection Authority, please use the contact details below.

United Kingdom: [Information Commissioner's Office](#)

Where we rely on your consent to use your personal data, you have the right to withdraw that consent at any time.

Appendix A – Cookie policy

To enhance your experience on our site, our web pages use "cookies" to distinguish you from other users. If you use this website, then you accept that we can use the cookies set out below.

1.What are cookies?

Cookies are small data files that we place in your computer or mobile's browser to store your preferences. Cookies, by themselves, do not tell us your email address or other personal information unless you choose to provide this information to us by, for example, registering at one of our sites. Once you choose to provide a web page with personal information, this information may be linked to the data stored in the cookie. A cookie is like an identification card. It is unique to your computer and can only be read by the server that gave it to you.

2.Why do we use cookies?

We use cookies to understand site usage and to improve the content and offerings on our site. For example, we may use cookies to personalise your experience on our web pages and to provide you with a better service.

3.What cookies do we use?

We use the following cookies:

- **Strictly necessary cookies.** These are cookies that are required for the operation of our sites. There is no way to prevent these cookies being set other than to not use our site or not use that particular feature.
- **Analytical/performance cookies.** They allow us to recognise and count the number of visitors and to see how visitors move around our sites when they are using it. This helps us to improve the way our sites work, for example, by ensuring that users are finding what they are looking for easily.
- **Functionality cookies.** These are used to recognise you when you return to our site.

4.How to reject cookies

You can block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. Doing so however will likely limit the functionality of ours and a large proportion of the world's websites as cookies are a standard part of most websites.

If you are unsure as to how to manage your cookies or require more information, we have provided the following links to the settings pages for the most commonly used web browsers:

- **[Firefox internet settings](#)**
- **[Chrome cookie settings](#)**
- **[Opera cookie settings](#)**
- **[Safari cookie settings](#)**
- **[Internet Explorer cookie settings](#)**