



Privacy Policy – Yealand Administration as a “Data Processor”

Please read this privacy policy as it describes how we intend to collect, process, store, share, and safeguard personal information as a “Data Processor”.

Yealand Administration Limited (“Yealand”) is committed to protecting the privacy and security of personal information entrusted to us.

Yealand Administration Limited act as the appointed Third Party Administrator (TPA) for Funds operated by a number of associated Authorised Corporate Directors/Alternative Investment Fund Managers (ACD/AIFM’s) – (“Data Controllers”). We are responsible for performing the administration function for the Funds.

This notice describes how we as a "Data Processor", collect and use personal information, in accordance with the General Data Protection Regulation (“GDPR”). It applies to all processing of personal data of individual investors or marketing recipients that we undertake for our associated “Data Controllers”, and supplements any other similar notices or information provided at the time personal data was supplied.

The kind of information we hold

We may collect, store, and use the following categories of personal information:

- personal details such as name, title, date of birth, addresses, telephone numbers and email addresses;
- identification and verification information and documents, such as signatures, passports, driving licences, birth/marriage certificates and tax/credit references; and
- financial and transactional information relating to your investments and your instructions regarding these.

We may also in some circumstances record telephone conversations. If we are provided with additional information about an individual, in particular by telephone or email, we may for regulatory reasons be required to collect and store the record as a whole. This might include:

- information about date and place of birth, nationality, tax residency, tax references etc., race or ethnicity, religious beliefs, sexual orientation, marital status, and political opinions; or
- information about health, including any medical condition.

How is personal information collected?

We typically collect personal information about individual investors, directly from them as instructed by the Data Controllers. We will collect other information from third parties in the course of carrying out our anti-money laundering/anti-fraud obligations. We may also collect additional personal information in the course of our relationship as a necessity of the services being provided.

How we will use information

We will only use personal information when the law allows us to and this is known as a “legal basis” for processing and as part of the agreement with our associated Data Controllers.

Situations in which we will use personal information

We may use personal information to:

- administer investment in accordance with instructions;
- communicate with individuals to provide information about products, services, events, promotions or other intellectual capital, we will only do so where it has been indicated to us that individuals wish to receive such information;
- process identification details in order to comply with anti-financial crime obligations;
- check identification details against databases of individuals who are subject to sanctions, classified as “politically exposed persons” (PEP) or have committed crimes and following up any suspicions, in order to ensure that we comply with anti-money laundering and counter terrorist financing obligations and to avoid fraud itself; and
- meet other compliance and regulatory duties, for example to retain certain records.

We may also use personal information where we need to protect individual interests or someone else's interests; or where it is needed in the public interest or for official purposes. There may be overlap in the circumstances in which we use the same information.

Change of purpose

We will only use personal information for the purposes for which we were instructed to process it by our associated Data Controllers, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use personal information for an unrelated purpose, individuals will be notified and we will explain the legal basis which allows us to do so.

Please note that we may process personal information without individual knowledge or consent, in compliance with the above rules, where this is required or permitted by law or regulation.

Data sharing and third party processors

We may need to share personal data with third parties, including other Business Contacts, other entities within the group and auditors. Where we share personal data with another party performing services for us, we require those third parties to respect the security of the personal data and to treat it in accordance with the law.

We may share personal information with:

1. a regulator or other authority (such as HMRC) in order to comply with the law;
2. a screening or identity checking service as required by law in order to carry out individual instructions in relation to the services we provide. This will include anti-money laundering, sanction and PEP status screening.

Yealand do not use personal information for any marketing purposes. Should we wish to do so, we would need express consent for this and the individual would have the right at any time to amend or cancel your instructions in this regard.

When might we share personal information with other entities in the group?

We will share personal information with other entities in our group only in so far as necessary to provide the products and services which have been requested or contracted from us.

Data Security

We have put in place measures to protect the security of information. Details of these measures are included in group-wide policies which cover the following:

- management and organisation of information security;
- classification of data which includes data handling rules;
- staff training on responsibilities connected to information security and data protection and the reporting of any information security incidents;
- physical and environmental security; and,
- systems security, including backups, virus protection and access controls.

We are committed to implementing, maintaining and continually improving an information security management system to ensure the highest standards. Our approach supports the enhancement of information security controls and our information governance framework is overseen by an appointed Data Protection Officer.

Data Retention

How long will we use information for?

We will only retain personal information for as long as necessary to fulfil the purposes we processed it for, including for the purposes of satisfying any legal or regulatory requirements.

Rights of access, correction, erasure, and restriction

Rights in connection with personal information

Under certain circumstances, by law individuals have the right to:

- **Request access** to personal information. This enables Individuals to receive a copy of the personal information we hold about them and to check that we are processing it lawfully.
- **Request correction** of the personal information that we hold. This enables individuals to have any incomplete or inaccurate information we hold about them corrected.
- **Request erasure** of personal information. This enables individuals to ask us to delete or remove personal information where there is no good reason for us continuing to process it. They also have the right to ask us to stop processing personal information where we are relying on a legitimate interest and there is something about their particular situation which makes them want to object to processing on this ground.
- **Request the restriction of processing** of personal information. This enables individuals to ask us to suspend the processing of personal information about them, for example if they want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of personal information to another party.

These rights can be exercised by contacting the Data Controller directly. Any such requests will be considered by the Data Controller, prior to Yealand taking any action.

Right to Withdraw Consent

Where individuals have provided consent to the collection, processing or transfer of personal information in order to receive marketing material from the associated Data Controllers, they have the right to withdraw that consent at any time.

Questions regarding Privacy Notice

If you have any questions about this privacy notice, please contact enquiries@yealand.com. If you are unhappy with how we handle personal information, please contact the appointed Data Protection Officer from the associated Data Controller firm. If your concerns are not resolved to your satisfaction, you have the right to make a complaint to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.

Changes to this Privacy Notice

We may update this privacy notice from time to time, and will communicate such updates through our website. We will not do so where we believe this would materially impact your rights and freedoms, in those circumstances we will expressly notify you. We may also notify you in other ways from time to time about the processing of your personal information