

OCEAN DIAL ASSET MANAGEMENT

PRIVACY POLICY

1. Introduction

This Privacy Notice explains the types of personal data that Ocean Dial Asset Management Limited ('ODAM', 'we') may collect about individuals. It also explains how we'll store and handle that data and keep it safe.

2. The legal bases we rely on for collecting personal data

With effect from 25th May 2018, the General Data Protection Regulation sets out a number of different reasons for which a business may collect and process personal data. These include:

- **Consent** - In specific situations, we can collect and process data with consent e.g. when an individual indicates that they want to be added to our marketing list(s).
- **Contractual obligations** - In certain circumstances, we need personal data to comply with our contractual obligations.
- **Legal compliance** - If the law requires us to, we may need to collect and process personal data.
- **Legitimate interest** - In specific situations, we require personal data to pursue our legitimate interests as part of running our business.

3. When do we collect personal data?

- When an individual contacts us by email, post etc.
- When an individual has given a third party permission to share that individual's personal data with us.
- When we collect personal data e.g. names, email addresses, contact telephone numbers, which are publicly available on other company websites, as part of our market research.

4. What sort of personal data do we collect?

- We may collect a name, email, telephone number and/or the company that an individual works for. We may also hold the individual's business address and position.
- Copies of documents you provide to prove your age or identity where the law requires this, e.g. for recruitment purposes.
- Details about potential employees obtained from referees.

5. How and why do we use personal data?

- To provide you with information regarding the funds that we manage.
- For recruitment purposes;
- To respond to your queries, questions or complaints.

6. How we protect personal data

We will treat personal data with the utmost care and take all appropriate steps to protect it, in accordance with our Data Security Policy.

7. How long will we keep personal data?

Whenever we collect or process personal data, we'll only keep it for as long as is relevant for the purpose for which it was collected.

8. Who do we share personal data with?

We will never share your personal data with third parties for the purposes of marketing.

9. Where personal data may be processed

We only process personal data in the UK and other countries in the EU.

10. What are your rights over your personal data?

You have the right to request:

- Access to the personal data we hold about you, free of charge.
- The correction of your personal data when incorrect, out of date or incomplete.
- That we stop any consent-based processing of your personal data after you withdraw that consent.

Right to withdraw consent

Whenever you have given us your consent to use your personal data, you have the right to change your mind at any time and withdraw that consent.

11. Contacting the Regulator

If you feel that your data has not been handled correctly, or you are unhappy with our response to any requests you have made to us regarding the use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office. You can contact them by calling 0303 123 1113. Or go online to www.ico.org.uk/concerns

If you have any questions

- Email us at: enquiries@oceandial.com
- Or write to us at:

Compliance Manager, Ocean Dial Asset Management Limited, 13-14 Buckingham Street, London WC2N 6DF

This notice was last updated on 4th May 2018.