



**CDAM (UK) Limited**

**Privacy Notice &  
Website Privacy Policy**



## PRIVACY NOTICE

### Introduction

Your privacy is very important to us. This notice (this "Privacy Notice") is provided by CDAM (UK) Limited ("CDAM") and sets forth CDAM's policies for the collection, use, storage, sharing, disclosure (collectively, "processing") and protection of personal data relating to CDAM's current, prospective and former clients.

This Privacy Notice is being provided in accordance with the requirements of data privacy laws, including the EU General Data Protection Regulation 2016/679 ("GDPR"), the U.S. Gramm-Leach-Bliley Act of 1999, as amended, and any other law relating to privacy or the processing of personal data and any statutory instrument, order, rule or regulation implemented thereunder, each as applicable to CDAM (collectively, "Data Protection Law"). References to "you" or an "investor" in this Privacy Notice mean any investor who is an individual, or any individual connected with an investor who is a legal person (each such individual, a "data subject"), as applicable.

### The types of personal data we may collect and use

The categories of personal data we may collect include names, residential addresses or other contact details, signature, nationality, place of birth, tax identification number, social security number, date of birth, place of birth, copies of identification documents, bank account details, information about assets or net worth, credit history, source of funds details, photographs as well as other sensitive information.

### Using your personal data: the legal basis and purposes

We may process your personal data for the purposes of administering the relationship between you and us (including communications and reporting), direct marketing of our products and services, monitoring and analyzing our activities, and complying with applicable legal or regulatory requirements (including anti-money laundering, fraud prevention, tax reporting, sanctions compliance, or responding to requests for information from supervisory authorities with competent jurisdiction over our business). Your personal data will be processed in accordance with Data Protection Law and may be processed with your consent, upon your instruction, or for any of the purposes set out herein, including where we or a third-party consider there to be any other lawful purpose to do so. We also may receive your personal information from third parties or other sources, such as our affiliates, the administrator (including any sub-administrator) of a fund/managed account or publicly accessible sources, such as the Internet.

### How we may share your personal data

We may disclose information about you to our affiliates or third parties, including the administrator (and any sub-administrator), the brokers and the custodian(s) of a fund/managed account, for our everyday business purposes, such as to facilitate transactions, maintain your account(s) or respond to court orders and legal investigations. It may also be necessary, under anti-money laundering and similar laws, to disclose information about investors in order to accept subscriptions from them or to facilitate the establishment of trading relationships for a fund/managed account with executing brokers or other trading counterparties. We will also release information about you if you direct us to do so.

We may share your information with our affiliates for direct marketing purposes, such as offers of products and services to you by us or our affiliates. You may prevent this type of sharing by contacting us as described below (see "Who to contact about this Privacy Notice"). We may also disclose information about your transactions and experiences with us to our affiliates for their everyday business purposes. If you are a new investor, we can begin sharing your information 30

days from the date we sent this Privacy Notice. When you are *no longer* our investor, we may continue to share your information as described in this Privacy Notice.

We may disclose information you provide to us to companies that perform marketing services on our behalf, such as any placement agent retained by a fund.

### **Monitoring of communications**

We may record and monitor telephone conversations and electronic communications with you for the purposes of: (i) ascertaining the details of instructions given, the terms on which any transaction was executed or any other relevant circumstances; (ii) ensuring compliance with our regulatory obligations; and/or (iii) detecting and preventing the commission of financial crime.

### **Retention periods and security measures**

We will not retain personal data for longer than is necessary in relation to the purpose for which it is collected, subject to Data Protection Law. Personal data will be retained for the duration of your investment in a fund/managed account and for a minimum period of five to seven years after a redemption/withdrawal of an investment from a fund/managed account or liquidation of a fund/managed account. We may retain personal data for a longer period for the purpose of marketing our products and services or compliance with applicable law. From time to time, we will review the purpose for which personal data has been collected and decide whether to retain it or to delete if it no longer serves any purpose to us.

To protect your personal information from unauthorized access and use, we apply organizational and technical security measures in accordance with Data Protection Law. These measures include computer safeguards and secured files and buildings. We will notify you of any material personal data breaches affecting you in accordance with the requirements of Data Protection Law.

### **International transfers**

Because of the international nature of a fund/investment management business, personal data may be transferred to countries outside the EEA ("Third Countries"), such as to jurisdictions where we conduct business or have a service provider, including countries that may not have the same level of data protection as that afforded by the Data Protection Law in the EEA. In such cases, we will process personal data (or procure that it be processed) in the Third Countries in accordance with the requirements of the Data Protection Law, which may include having appropriate contractual undertakings in legal agreements with service providers who process personal data on our behalf in such Third Countries.

### **Your rights under Data Protection Law**

You have certain rights under GDPR in relation to our processing of your personal data and these are, generally: (i) the right to request access to your personal data; (ii) the right to request rectification of your personal data; (iii) the right to request erasure of your personal data (the "right to be forgotten"); (iv) the right to restrict our processing or use of personal data; (v) the right to object to our processing or use where we have considered this to be necessary for our legitimate interests (such as in the case of direct marketing activities); (vi) where relevant, the right to request the portability; (vii) where your consent to processing has been obtained, the right to withdraw your consent at any time; and (viii) the right to lodge a complaint with a supervisory authority. You should note that your right to be forgotten that applies in certain circumstances under GDPR is not likely to be available in respect of the personal data we hold, given the purpose for which we collect such data, as described above.

You may contact us at any time to limit our sharing of your personal information. If you limit sharing for an account you hold jointly with someone else, your choices will apply to everyone on your account. U.S. state laws may give you additional rights to limit sharing.

### **Complaining to supervisory authorities**

A complaint in respect of CDAM (UK) Limited may be made to the Information Commissioner's Office in the United Kingdom.

### **Who to contact about this Privacy Notice**

Please contact CDAM's Data Controller George Chamberlain, COO on email: [george@cdam.co.uk](mailto:george@cdam.co.uk) , Tel: +44 207 183 0941 or by writing to the following address: CDAM (UK) Limited, 16 Clifford Street, London W1S 3RG, United Kingdom for any questions about this Privacy Notice or requests with regards to the personal data we hold.

## WEBSITE PRIVACY POLICY

### Introduction

This privacy policy intends to clarify how we at CDAM (UK) Limited ("CDAM") collect and use personal data supplied through our website [www.cdam.co.uk](http://www.cdam.co.uk).

This is required as a result of the General Data Protection Regulation (GDPR) (EU) 2016/679, a regulation in EU law on data protection and privacy for all individuals within the European Union. The legislation seeks to ensure that all personal data held by businesses and organisations is both accurate and suitably protected in order to ensure there is no misuse of personal data relating to an individual held by the business or organization.

Therefore please carefully read this privacy policy which has been developed with a view to protecting your personal data as well as ensuring that we comply with the relevant legislation. By using our website you consent to the collection and use of your personal data in the manner set out below. If we change or modify our privacy policy we shall update this document on our website.

### Data protection

When you visit this website, and in the course of our providing services to you, we may collect personal data about you when you are asked to provide data (e.g. name, e-mail address) or when you e-mail, phone, or otherwise contact us.

'You' or 'your', in this privacy policy, means you as an individual, rather than any legal entity (such as your employer) which you may represent when you order a service from us via this website.

We may process personal data collected via this website or otherwise for the purposes of administering the website, responding to queries or provide services to you at your request, updating our records and databases, improving the personalization of our services to you, maintaining contact data about you or a third party (for example, your employer), informing you of features, services, products, fund launches and related information from CDAM or third parties which may be of interest to you and otherwise to enable us to perform any agreement with you, your employer or any other relevant third party. We will not share your personal data with others for marketing purposes.

In addition, if we appoint third parties to host, maintain, manage, or to provide other services in relation to the website then your personal data may be accessed and used by these third parties to the extent necessary to fulfil their hosting, maintenance, managerial, and/or other functions.

If you are acting as an intermediary or otherwise on behalf of a third party or supply us with information regarding a third party (such as your employer or a client company), you undertake that you are an authorized representative or agent of such third party and that you have obtained all necessary consents from such third party to the collection, processing, use and disclosure by us of their personal data.

The data may be disclosed to certain types of staff within CDAM (i.e. staff whose job it is to process your enquiries or otherwise to administer the website, and those staff involved in the provision of CDAM services and products which may be of interest to you.)

Because of the international nature of this website and the nature of CDAM's activities, personal data may be transferred internationally for the purposes described above.

## Cookies

Like many websites, we may also use cookies. A cookie is a piece of data stored on a user's hard drive containing information about a user's use of a website. As explained below, we use cookies in order to make the website work, or work more efficiently, as well as to provide information to us:

- 'Session based' cookie. This is essential for parts of the website to operate and has already been set. It is used to maintain the state of a user's actions so as not to constantly request the same information from them within a 'session' .
- 'Analytics' cookie. This is used to collect information about how you use our site, such as where you have come to the site from and which website pages you have visited. We use the information to help us improve the website.

You can enable or disable cookies by modifying the settings in your browser; however, you may not be able to use all of the features of the website if cookies are disabled. You can find out how to disable/enable cookies at [www.allaboutcookies.org](http://www.allaboutcookies.org).

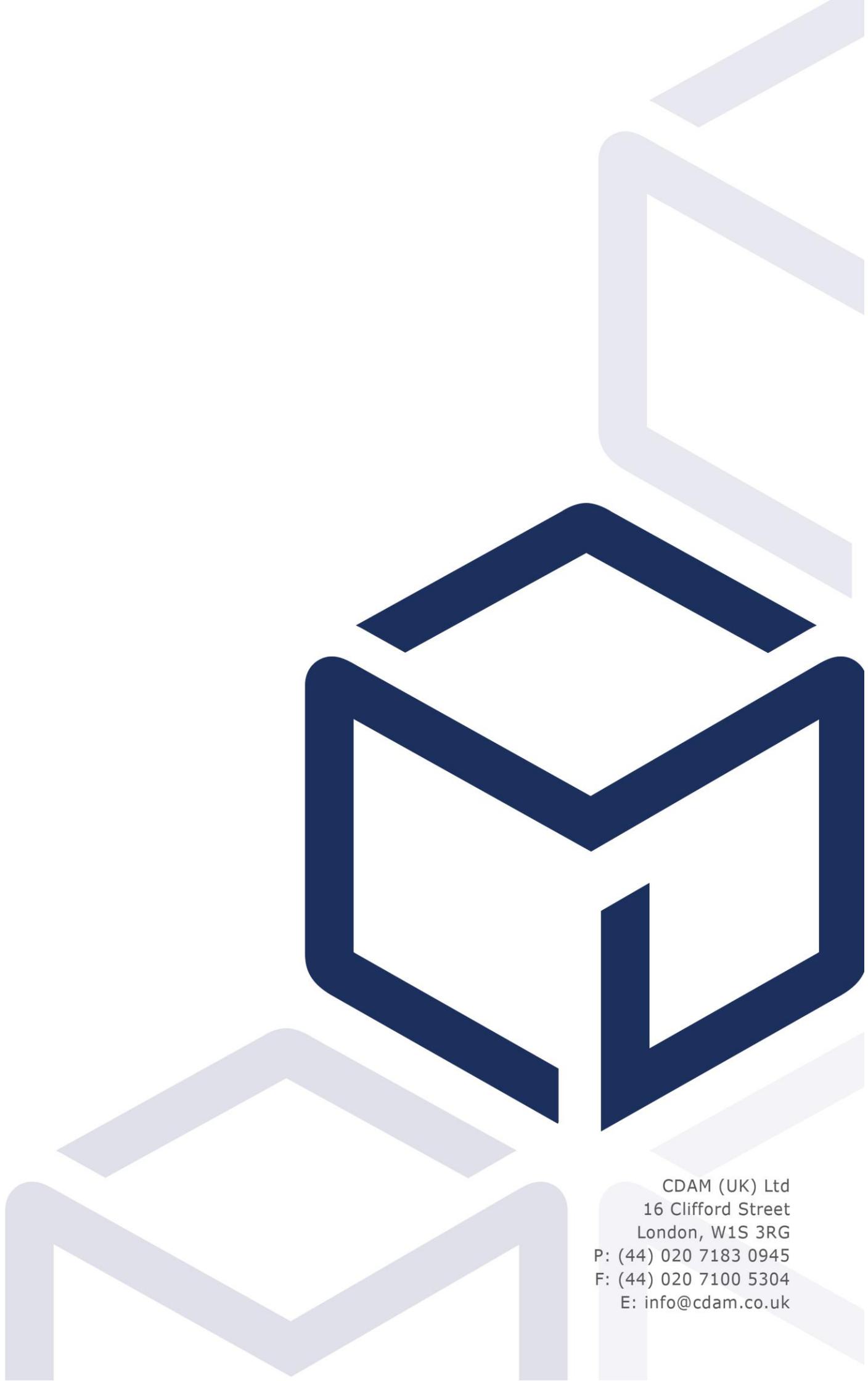
The website uses reasonable physical, electronic, and procedural measures to safeguard information against loss, theft, and unauthorized use, disclosure, or modification. Unfortunately, the nature of the Internet means that data may flow over networks without appropriate security measures and may be accessed and used by unauthorized persons.

Please note that this privacy policy only covers [www.cdam.co.uk](http://www.cdam.co.uk) and does not regulate the privacy practices of other websites which may be accessible through or linked to this website.

## Questions and Contact

If you have any questions in relation to the information concerning privacy and personal data above please contact us. Likewise, if your personal data changes or if you no longer wish to receive our services, please let us know and we will correct, update or remove your details. This can be done by e-mailing CDAM's Data Controller is George Chamberlain, COO: [george@cdam.co.uk](mailto:george@cdam.co.uk)

Please visit the 'Office & Contact' section of our website for our mailing address and telephone number.



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