

## **CONBRIO FUND PARTNERS PRIVACY NOTICE (INVESTORS)**

***This notice sets out how ConBrio and the Administrator will process personal information in relation to your investment (as data controller and data processor respectively)***

This Privacy Notice explains what personal data (information) we hold about you, how we collect it, and how we use and may share information about you. We are required to notify you of this information under UK data protection legislation. Please ensure that you read this notice and any other similar notice we may provide to you from time to time when we collect or process personal information about you.

### **Who collects the information?**

ConBrio Fund Partners Limited (“ConBrio”) is a data controller and gathers and uses certain information about you in its capacity as authorised corporate director of funds that are open-ended investment companies (together “Funds”). At the date of this Privacy Notice, ConBrio has appointed a number of third parties as registrar and transfer agent (the “Administrator”) and fund accountant to the Funds, as set out in each Fund’s prospectus. ConBrio may also share information with other members of its group, Thesis Unit Trust Management Limited and Thesis Services Limited.

### **What information do we collect about you?**

We collect your name, address (including proof of name and address), signature, photo identification, personal and work contact details (email address and phone numbers), job title and employer name, nationality/dual nationality, citizenship, tax residency, date of birth, passport details, national insurance number and other tax details, adviser details (where relevant), investment details, banking details, family connections, source of funds, details of any complaints made, data received from due diligence investigations (such as anti-money laundering, politically exposed persons and sanctions checks), fraud enquiries, recordings of telephone conversations and electronic communications with our staff and information about your mental health where a power of attorney is provided.

### **How do we collect the information about you?**

Where your details are provided to ConBrio as a consequence of your investment in any of the Funds, then ConBrio, acting as a data controller may itself, or through the Administrator, process your personal information if you are an individual investor or that of your directors, officers, employees and/or beneficial owners where you are an institutional investor. When processing your personal information, there may also be times where the Administrator will act as an independent data controller in respect of your personal information. For the avoidance of doubt, the Administrator will not at any time be acting as a joint controller with the Fund. In connection with this, please note the following:

## Purposes of Processing and Legal Basis for Processing

Your personal data may be processed by ConBrio or the Administrator (or any of their affiliates, agents, employees, delegates or sub-contractors) for the following purposes:

- to facilitate the opening of your account with the Fund, the management and administration of your holdings in that Fund and any related account on an on-going basis (the “**Services**”) which are necessary for the performance of your investment in the Fund, including without limitation the processing of redemption, conversion, transfer and additional subscription requests and the payment of distributions;
- in order to carry out anti-money laundering checks and related actions which ConBrio considers appropriate to meet any legal obligations imposed on ConBrio relating to, or the processing in the public interest or to pursue ConBrio’s legitimate interests in relation to, the prevention of fraud, money laundering, terrorist financing, bribery, corruption, tax evasion and to prevent the provision of financial and other services to persons who may be subject to economic or trade sanctions, on an on-going basis (collectively “AML checks”), in accordance with ConBrio and the Administrator’s anti-money laundering procedures;
- to report tax related information to tax authorities in order to comply with a legal obligation;
- to monitor and record telephone calls and electronic communications for (i) processing and verification of instructions, (ii) investigation and fraud prevention purposes, (iii) for crime detection, prevention, investigation and prosecution, (iv) to enforce or defend the Fund, ConBrio and/or its affiliates, itself or through third parties to whom it delegates such responsibilities or rights in order to comply with any legal obligation imposed on ConBrio, (v) to pursue the Fund or ConBrio’s legitimate interests in relation to such matters; or (vi) where the processing is in the public interest;
- to disclose information to other third parties such as service providers of the Fund appointed by ConBrio, auditors, regulatory authorities and technology providers in order to comply with any legal or regulatory obligation imposed on the Fund, ConBrio or the Administrator or in order to pursue the legitimate interests of the Fund, ConBrio or the Administrator;
- to monitor and record telephone calls for quality, business analysis, training and related purposes in order to pursue the legitimate interests of the Fund, ConBrio or the Administrator to improve their service delivery;
- to update and maintain records and carry out fee calculations in order to pursue the legitimate interests of the Fund, ConBrio or the Administrator or in order to comply with any legal obligation imposed on the Fund or ConBrio nor the Administrator, and which are necessary for the Fund’s, ConBrio’s or its affiliates’, the Administrator’s or its affiliates’ legitimate interests indicated above and/or where the processing is in the public interest; and
- to monitor and assess the outcomes retail customers receive by requesting customer feedback including by using surveys.

## Recipients of Data

ConBrio may disclose your personal information as follows:

- to the service providers, including the Administrator, and their affiliates and approved sub-contractors, and other third party service providers engaged by ConBrio on behalf of the Funds in order to process the data for the above mentioned purposes;
- to competent authorities (including tax authorities), courts and bodies as required by law or requested or to affiliates for internal investigations and reporting;
- to the Administrator and/or its affiliated as joint controllers:
  - to create a single source record, relating to you as an investor, which is held, maintained and used by the Administrator and its affiliates as joint controllers in pursuance of the Administrator's, its affiliates' and the Fund's legitimate interests;
  - where you subscribe to use the Administrator's investor portal functionality, for the purposes of the performance of the Administrator's agreement with you in relation to your use of that portal functionality, including for security in connection with the portal;
  - to retain Anti-Money Laundering checks and other records of individuals to assist with the subsequent screening of them by the Administrator or its affiliates, including in relation to other funds or clients of the Administrator or any of its affiliates in pursuance of the Administrator's, its affiliates' or its clients' legitimate interests and to meet any legal obligations imposed on the Administrator or its affiliates;
- to the depositary or the trustee of the Fund in which you invest for compliance with their regulatory obligations in relation to the Fund;
- to professional advisers; and
- to potential purchasers of some or all of our business or on a restructuring.

In any case where ConBrio shares your personal information with a third party processor (including, as appropriate, the Administrator and its affiliates), the use by that third party of your personal information will be subject to the third party's own privacy policy, a copy of which can be obtained from the Head of Compliance – please see "How to Contact Us" below for contact details. Recipients with whom we share your personal data as an investor in a Fund, and why we may need to share it, are set out in our list of personal data recipients, which will be updated from time to time. A hard copy can be obtained from the Head of Compliance – please see "How to Contact Us" below for contact details.

Usually, information will be anonymised but this may not always be possible. The recipient of the information will be bound by confidentiality obligations.

We seek to ensure that our information collection and processing is always proportionate. We will notify you of any changes to information we collect or to the purposes for which we collect and process it.

Where we provide links to websites of other organisations, this privacy notice does not cover how that organisation processes personal information. We encourage you to read the privacy notices on the other websites you visit.

### **Where information may be held**

Information may be held at ConBrio's offices, the Administrator's offices and the offices of any of their affiliates, agents, employees, delegates or sub-contractors. The disclosure of personal information to the third parties set out above may involve the transfer of data to the USA and other jurisdictions outside the UK. Such countries may not have the same data protection laws as the UK. We will, however, put in place appropriate security procedures in order to protect your personal information. Where your information is transferred to any country outside the UK, we ensure that this is done using specific legally approved safeguards. You can request further details and a copy of these safeguards by contacting us (see "[How to contact us](#)" below).

### **Retention period**

ConBrio and the Administrator will retain your personal information for as long as required for ConBrio or the Administrator to perform the Services and/or carry out the purposes for which the data was collected, or perform investigations in relation to same and/or for additional periods where legal/regulatory obligations mandate that ConBrio or the Administrator retains your personal information. We have a regulatory requirement to retain records for six years to enable the Funds and ConBrio to comply with the Financial Conduct Authority Rules and The Open-Ended Investment Company Regulations 2001, as amended from time to time. We will require a reasonable number of working days to complete the deletion of your personal data from our systems and those of the recipients with whom we share your data.

### **Updates to Personal Data**

ConBrio will use reasonable efforts to keep your personal information up to date. However, you will need to notify the Fund and the Administrator without delay in the event of any change in your personal circumstances, so that ConBrio can keep the personal information up to date. Please contact us by calling [01243 531234](tel:01243531234) or by emailing [info@tutman.co.uk](mailto:info@tutman.co.uk) if you require the Administrator's contact details to do this.

### **Subject Access Request**

You have the following rights, in certain circumstances, in relation to your personal information:

- Right to access your personal information.
- Right to ask where and how your personal information is being stored.
- Right to rectify your personal information.
- Right to restrict the use of your personal information (in certain specific circumstances).
- Right to request that your personal information is erased where there is no good reason for us to continue to process it.
- Right to object to processing of your personal information where we are relying on a legitimate interest (or that of a third party).
- Right to data portability.

Please contact [compliance@tutman.co.uk](mailto:compliance@tutman.co.uk) if you would like to correct or request access to information or request information be erased that we hold relating to you or if you have questions about this notice. We will respond to your request within one month of receipt of your request. In some cases, we may not be able to fulfil your request to exercise the right before this date, and may need to request more time. Where we cannot provide a full response to you for any reason, we will let you know about this in our initial reply to your request. In most circumstances there will be no charge for providing this information. ConBrio will only charge a fee if the request is manifestly unfounded or excessive, especially if it is repetitive, or the request is for further copies of the same information.

You can also request the information (above) verbally but we recommend you also do this in writing so that you have a record of your request. Please see the "How to contact us" section in this notice.

ConBrio is required to respond to your request within one calendar month of receiving your request.

Where ConBrio or the Administrator requires your personal information to comply with AML checks or other legal requirements, failure to provide this information means ConBrio may not be able to accept you as an investor in the relevant Fund.

## **Cookies**

For users of our website, [www.conbriofunds.com](http://www.conbriofunds.com), web browser cookies, which are small text files, are placed on your computer to store information such as your IP address or other identifier, your browser type, and information about the content you view and interact with on our website. This information is used to remember your preferences and settings, remember information you may enter online, to keep you logged on to portals that we may offer, to generate statistics about how visitors use our website and to improve our website. Cookies do not give us access to your computer or any information about you, other than the data you choose to share with us.

For more information on the cookies we use and why, please go to [www.conbriofunds.com](http://www.conbriofunds.com) and refer to the Cookie Policy.

You can choose to accept or decline cookies via your browser settings. To find out how to manage and delete cookies, visit [Managing Cookies | About Cookies](#). To opt out of being tracked by Google Analytics across all websites visit [Privacy controls in Google Analytics - Analytics Help](#).

Opting not to use cookies may prevent you from taking full advantage of the website.

## **How we keep your information secure**

We acknowledge that the information you provide may be confidential and will maintain the confidentiality of and protect your information in accordance with our normal procedures and all applicable laws. We have appropriate technical and organisational measures in place to prevent personal information from being accidentally lost, or used or accessed in an unauthorised way. We limit access to your personal information to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality. This also extends to our subcontractors.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data. Any transmission is at your own risk. Once we have received your information, we will use procedures and security features to try to prevent unauthorised access.

### **How to complain**

If you consider that the processing of personal data relating to you carried out by ConBrio or its service providers infringes data protection law, you have the right to lodge a complaint with the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF (or at the relevant regional office for Scotland, Wales or Northern Ireland, details of which are available at [About the ICO | ICO](#)), via the Live Chat link at [Make a complaint | ICO](#) or by telephone on **0303 123 1113**.

### **Changes to our Privacy Notice**

We will keep this Privacy Notice under regular review. Any changes we make to our Privacy Notice will be posted on our website at [www.conbriofunds.com](http://www.conbriofunds.com) or can be requested by email from the Head of Compliance at [compliance@tutman.co.uk](mailto:compliance@tutman.co.uk) or by writing to The Head of Compliance, ConBrio, Exchange Building, St John's Street, Chichester, West Sussex PO19 1UP. This Privacy Notice was last updated on 8 December 2023.

### **Do you need extra help?**

If you require any **additional support** (for example, you require this document in large print, braille or audio), please get in touch with us.

If you are deaf, have hearing loss or are speech impaired, you can contact us by using the **Relay UK** service. You can do this either by using the free app on your smartphone, tablet or computer, or by dialling 18001 before our number using your textphone. The Relay UK service is free, you will only pay your normal charges for the call.

### **How to contact us**

If you have any questions about our use of your personal information, please contact us by email at [compliance@tutman.co.uk](mailto:compliance@tutman.co.uk), or by writing to The Head of Compliance, ConBrio, Exchange Building, St John's Street, Chichester, West Sussex PO19 1UP or by calling 01243 531234, Monday to Friday between 9am and 5pm.