

Data Privacy Notice

Gallium Fund Solutions Limited (“**Gallium**” or “**we**”) takes your privacy seriously and we are committed to protecting and respecting your privacy.

When we perform the role of the Operator, AIFM or Trust Manager on an investment Fund we process certain personal information about you (known as “**personal data**”). For the purposes of the Data Protection Act 2018 and the EU Data Protection Regulation 2016/679, we are a controller of your data and this Privacy Notice sets out the basis on which any personal data we collect on you (the “**Investor**”¹), or that you provide to us, will be processed by us.

Information we hold

We may collect and process the following data about you:

- **Information you give us.** You may provide us with information about you by completing an application form or by correspondence via phone, email, or in writing. This includes, but is not limited to, information you provide when applying for an investment, requesting valuations and updating your account. The information you give us may include, but is not limited to: your name, address, email address, date of birth, bank account number and sort code.
- **Information we receive from other sources.** We may receive information about you from other parties such as HM Revenue & Customs, the Financial Conduct Authority, credit reference agencies or someone acting on your behalf, such as an independent financial adviser. The information we receive from other sources may include, but is not limited to: your name, address, date of birth, investor category, bank account number and sort code and verification of identity.

We do not hold any particularly sensitive information about you known as Special Categories of Data. This is data which concerns your ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, biometric data, data concerning health or data concerning your sex life or orientation. Except where the legislation allows it, this information cannot be processed or passed to a third party without your explicit consent.

We may, in limited circumstances, process criminal offence data as part of our anti-money laundering checks that are required by law.

¹ This includes current, potential and past investors.



Uses of the information we hold

Gallium may process your personal information in order to:

- *fulfil our contractual obligations*

When you apply for an investment you enter into a contractual relationship. The parties to that agreement are mutually obliged to fulfil their respective obligations. For example, applicants must provide truthful and accurate information and a Fund Manager must manage, monitor and administer the investment.

In order for us to perform our contract with you or an associated party we must therefore process your personal information. We may also be required to process your data at your request prior to entering into such contract.

- *to fulfil our legal requirements*

Gallium is subject to legislation and our processing activities are necessary to comply with these legal obligations. For instance we will process your personal data if we are required to act in response to you exercising your rights under data protection laws or when we need to verify your identity to prevent fraud and money laundering.

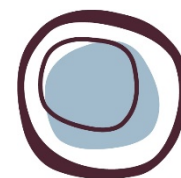
Gallium has a legitimate interest in holding and processing the above information about you as it is needed for us to properly manage and administer your investment and to accurately calculate and distribute investment holdings. We also keep the above information in order to allow us to comply with our contractual obligations towards our clients and investors, as well as to comply with relevant legislation.

Sharing the information we hold

We never trade, rent or sell your personal information to others, however we may share your information with selected third parties including:

- Gallium entities and associated companies involved in the operation of the Fund
- Judicial or governmental bodies (such as HMRC, Financial Conduct Authority, Financial Ombudsman Service) in order to comply with our legal and regulatory obligations – we can be fined and subject to other action if we fail to provide certain information to these authorities
- Someone acting on your behalf, such as an independent financial adviser or Trustee
- Service and software providers to assist with IT and security
- Professional advisers to Gallium or the Fund
- Credit reference and fraud prevention agencies to help us detect and prevent money laundering and financial crime

We do not share your personal information to any countries or organisations outside the European Economic Area (EEA).



Storing your information

Personal data is held on paper and computer systems. As the “data controller”, Gallium must process this information fairly and lawfully.

We store your data on secure servers in the European Economic Area (EEA). Sending information via post or over the internet is generally not completely secure so we can’t guarantee the security of your data while it is in transit. Any data you send to us is at your own risk. However, once we have received your data we have security features and safeguards in place to help keep your data secure.

We implement commercially reasonable electronic, physical and procedural safeguards to protect your personal data from unauthorised access, disclosure, destruction and misuse. Security of your data is a priority but despite our efforts, no security measures can be impenetrable.

How long we keep personal data for

We must keep all personal data safe and only hold it for as long as necessary to fulfil the purposes described in this Privacy Notice and for as long is required by legislation and internal policy. For example, the Alternative Investment Fund Manager Regulations requires records be kept for a minimum of 5 years and UK tax law requires records be kept for a minimum of 6 years. However, we may be required to keep some of your personal information for longer than described, for example to comply with requests for information.

We review the personal data held in relation to the Fund on a regular basis in accordance with our data retention policy. If we conclude that certain personal data is no longer needed, that personal data will generally be destroyed.

Your rights

- **Right of Access** – you have the right to see personal data that is held about you and a right to have a copy provided to you, or someone else on your behalf, in a machine readable (namely, digital) format
- **Right to Rectification** – if at any point you believe that the personal data we hold about you is inaccurate or wrong, you can ask to have it corrected
- **Right to Restrict Processing** – you can require the processing of your personal data be restricted in certain circumstances, for example, whilst a complaint about its accuracy is being resolved
- **Right to Object to Processing** – if legitimate interests is a reason for processing, you can object to your personal data being processed, although we can override this objection in certain circumstances.
- **Withdrawing Consent** – where you have given us your consent to processing your personal data, you can withdraw that consent at any time by notifying us (see “Who to contact”



below). However, withdrawing your consent will not affect the processing of any personal data which took place beforehand and it may be possible for us to continue processing your personal data where this is justified.

- **Right to be Forgotten** – you can request that your personal data is deleted altogether, although the we can override this request in certain circumstances.

You should be aware that taking any of the above steps could impact our relationship with you and our ability to perform our service, for example our ability to answer questions relating to your investment.

Information will generally be provided to you free of charge, although we can charge a reasonable fee in certain circumstances.

Who to contact

If you wish to:

- see your personal data or to exercise any of the rights mentioned above
- request an electronic copy of the notice
- make a complaint about how we have handled your personal data

please do not hesitate to contact us in either of the following ways:

In writing: **Data Protection Team**
 Unit 2 Station Court
 Station Approach, Borough Green
 Sevenoaks
 TN15 8AD

By email: admin@gallium.co.uk (Subject: Data Protection)

Making a complaint to the Information Commissioner's Office

If you are not satisfied with our response to any query you raise with us, or you believe we are processing your personal data in a way which is inconsistent with the law, you can complain to the Information Commissioner's Office whose helpline number is: **0303 123 1113**.

Updates to this notice

This notice is the latest version as at May 2018 and will be updated from time to time.