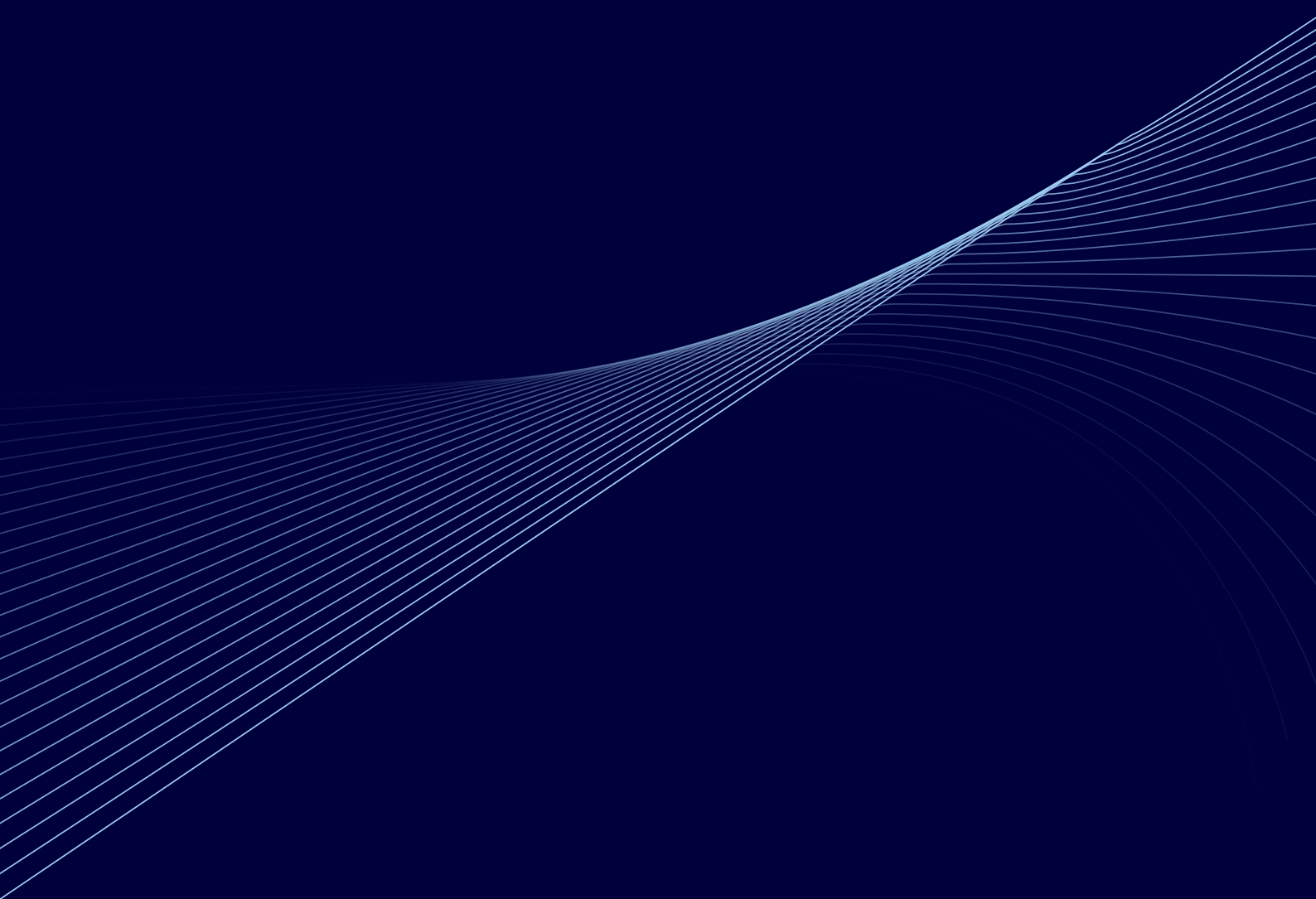


SEPTEMBER 2023

Privacy Policy



Privacy Policy

Blakeney LLP (“Blakeney”) and the funds and accounts managed by Blakeney each act as a data controller and/or data processor in respect of your personal data for the purposes of the European Union’s General Data Protection Regulation (“GDPR”). Blakeney is responsible for ensuring that it uses your personal data in compliance with GDPR.

This Privacy Notice applies to you if:

- I. you are an investor or prospective investor in any of Blakeney’s funds;
- II. you are a client or potential client of Blakeney;
- III. you have requested to receive any Blakeney marketing material;
- IV. you are a job applicant;
- V. you are a service provider or supplier;
- VI. you are a business partner/contact; and/or
- VII. you have given your Personal Data to Blakeney for any other purpose.

This Privacy Notice is intended to ensure that you are aware of the categories of your personal data Blakeney (“we”, “us” or “our”) may collect, how we collect it, what we use it for and with whom we share it in accordance with the GDPR.

The term “personal data” under the GDPR is defined as “any information relating to an identified or identifiable natural person (‘data subject’); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person”.

What personal data might we collect about you?

Personal data held by us or on our behalf may include, but is not necessarily limited to, your name, residential address, place of business, email address, other contact details, corporate contact information, signature, nationality, country of residence, place of birth, date of birth, tax identification, tax jurisdiction, employment and job history, education details, regulatory status, credit history, correspondence records, passport number, bank account details, certain financial information contained within KYC documents, source of funds and details relating to your investment activity or preferences.

How do we use your personal data?

The purposes for which we may collect, store, use and process personal data about you are as follows:

Existing and prospective investors and clients:

- To undertake pre-investment steps, including, but not limited to:
 - » determining your eligibility to invest;
 - » required due diligence; and
 - » ascertaining your investment preferences.
- To undertake business development and marketing activities in relation to making suggestions and recommendations to you about products or services that may be of interest to you. This may include direct electronic marketing.
- To facilitate the opening of your account, the management and administration of your account on an on-going basis as considered necessary or appropriate for the performance of your contract with the fund/investment vehicle, including without limitation the processing of subscription, redemption, conversion and transfer requests and the payment of distributions.
- To carry out anti-money laundering checks and related actions considered appropriate to meet any legal obligations relating to the prevention of fraud, money laundering, terrorist financing, bribery, corruption, tax evasion and the provision of financial and other services to persons who may be subject to economic or trade sanctions, on an on-going basis, in accordance with our anti-money laundering procedures.
- To report tax related information to tax authorities.
- To disclose information to other third parties such as auditors, administrators, custodians, brokers, legal counsel, technology providers and regulatory authorities to comply with any legal obligation imposed on us or in order to pursue our legitimate business interests.
- To monitor and record calls and other communications related to the processing and verification of instructions, quality and business analysis, compliance with applicable laws and regulations, maintaining our rights and responsibilities directly or through third party delegates.
- To maintain our records and carry out fee calculations.
- To provide client relations in respect of your account including provision of periodic reporting, seeking consents for changes to terms and for other corporate governance purposes.

Job applicants:

- To carry out checks in relation to your right to work in the UK;
- To make recruitment decisions in relation to both initial and subsequent employment e.g. promotion;
- To make decisions about salary and other benefits;
- To assess training needs;
- To deal with legal claims made against us; and
- To prevent fraud.

Others:

- To fulfil our contractual and other obligations to suppliers, contractors and other business partners; and
- To meet our legal and regulatory obligations.

We are entitled to process your personal data in these ways for the following reasons:

- The performance of a contract;
- Compliance with legal obligations; and
- Our legitimate business interests – in this instance the processing must be “necessary” and must balance the interests of the controller with the rights of the individual.

In addition to the uses above, please note that we may also process your information where required by law to do so or if we reasonably believe that it is necessary to protect our rights and/or to comply with judicial or regulatory proceedings, a court order or other legal process.

How is this information collected?

We typically collect personal data about you when you provide information to us or others acting on our behalf when communicating or transacting with us in writing, electronically, or by phone. For instance, applications, requests for product documentation or other forms of literature, your transactions and account positions.

In addition, we may receive personal information about you from third parties, such as:

- public sources or information vendors;
- your bank;
- your legal, financial, tax or other professional advisers;
- recruitment agencies, former employers when gathering references or credit reference agencies; and
- introducers or other intermediaries who market or provide services to you.

With whom will your information be shared?

We may share your personal data with a third party where this is required by law and/or where we have a legitimate interest in doing so.

We may need to share your personal data with:

- other entities within our group as part of our regular reporting activities in company performance or for assistance in relation to marketing and business development;
- the administrator;
- introducers, distributors or other intermediaries who market or provide services to you;
- professional advisers including lawyers, bankers, auditors and insurers to the extent such information is relevant to their performance of their services;
- regulators;
- tax authorities;

- custodians/depositaries;
- trading counterparties;
- cloud service providers;
- parties undertaking anti-money laundering checks; and
- any of our service providers where such information is relevant to their performance of such services.

We may also need to share your personal data with a regulator or to otherwise comply with applicable law or judicial process or if we reasonably believe that disclosure is necessary to protect our rights and/or to comply with judicial or regulatory proceedings, a court order or other legal process.

We may transfer the personal data we collect about you to EEA or non-EEA countries including in particular Luxembourg and Jersey where the parties listed above are based for the purposes outlined above. Those countries may not have the same standard of data protection laws as the EEA.

Where this is the case, we will (or we will require a processor to) put in place appropriate safeguards such as the EEA-approved standard contractual clauses to ensure that your personal data is treated in a manner that is consistent with and respects the EEA laws on data protection.

How long will your information be retained?

We will retain your personal data for as long as necessary to fulfil the purposes for which it was collected, including for the purposes of satisfying any legal, regulatory, accounting or reporting requirements and our legitimate interests in maintaining such personal information in our records. This will normally include any period during which we are dealing or expect to deal with you and what we consider to be a suitable period thereafter for our internal record-keeping purposes. In doing this we will have regard to the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements. Generally, we will keep information relevant to our dealings with you for 7 years following full redemption.

In some circumstances we may anonymise your personal data so that it can no longer be associated with you, in which case it is no longer personal data.

Once we no longer require your personal data for the purposes for which it was collected, we will securely destroy your personal data in accordance with applicable laws and regulations.

Accuracy of information

It is important that the personal data we hold about you is accurate and current. Please let us know if your personal data which we hold changes during your relationship with us.

Your rights in relation to your information

You have rights as an individual which you can exercise in relation to the information we hold about you under certain circumstances. These rights are to:

- request access to your personal data (commonly known as a “data subject access request”) and request certain information in relation to its processing;
- request rectification of your personal data;
- request the erasure of your personal data;
- request the restriction of processing of your personal data;
- object to the processing of your personal data;
- request the transfer of your personal data to another party.

In exercising your rights above, please note you may be required to redeem/withdraw from your investment.

You also have the right to make a complaint at any time to a supervisory authority for data protection issues. In the UK you may contact the Information Commissioner’s Office (<https://ico.org.uk>).

Fees

You will not usually have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is manifestly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal data is not disclosed to any person who has no right to receive it.

Right to withdraw consent

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal data for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose(s) to which you originally consented unless we now have an alternative legal basis for doing so.

Changes to this privacy notice

We reserve the right to update this Privacy Notice at any time and will make an updated copy of such Privacy Notice available to you and notify you when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal data.

Further information

This Privacy Notice was written with brevity and clarity in mind and is not an exhaustive account of all aspects of our collection and use of personal data.