

Mondrian Investment Partners Limited Privacy Notice

This Privacy Notice explains how Mondrian Investment Partners Limited (“Mondrian”, “we”, “us”, “our”), collects, uses, shares and otherwise processes your Personal Data in connection with your relationship with us as a client, consultant, or other professional third party acting for a client.

This privacy notice describes how we collect and use personal information about you during and after your relationship in accordance with applicable data privacy laws and the General Data Protection Regulation

(“GDPR”) which are applicable as of 25 May 2018.

Should you have any questions about this Privacy Notice you can contact us using this form or at the address mentioned at the end of this policy.

We may provide supplemental privacy notices on specific occasions when we are collecting or processing Personal Data about you so that you are fully aware of how and why we are using your Personal Data. Those supplemental notices should be read together with this Privacy Notice.

This Policy may be amended or updated from time to time to reflect changes in our practices with respect to the Processing of Personal Data, or changes in applicable law. We encourage you to read this Policy carefully, and to regularly check this page to review any changes we might make in accordance with the terms of this Policy.

Mondrian

Mondrian is made up of different legal entities and registered in different jurisdictions. This privacy notice is issued on behalf of all Mondrian entities, and to the extent we are a data controller, each of our entities is a joint data controller of your Personal Data.

Personal Data

The term “Personal Data” as used in this Privacy Notice means 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, location data, contact details etc. Personal Data does not include data from which you can no longer be identified such as anonymised aggregate data.

What information do we collect about you, how do we collect it and what do we use it for?

The kinds of Personal Data we may collect include your contact details (such as your address, email address and telephone number) and information such as your job title which we may request from you. In addition, we collect the Personal Data you choose to provide to us, e.g. if you contact us by letter, telephone, email or any other means of electronic or personal communication. We may also collect and store CCTV footage of you if you visit us at our offices.

Where permitted in accordance with local law, we may also in some circumstances record telephone conversations with you.

We will process your Personal Data if and to the extent applicable law provides a lawful basis for us to do so. We may process your Personal Data from a variety of sources as follows:

- a. if we need it to perform the contract we have entered into with you;
- b. if we need it to comply with a legal obligation;
- c. if we (or a third party) have a legitimate interest which is not overridden by your interests or fundamental rights and freedoms. Such legitimate interests will be the providing of investment services by us, administrative or operational processes within Mondrian and direct marketing; or
- d. if we collect Personal Data that you manifestly choose to make public, including via social media (e.g., we may collect information from your social media profile(s), to the extent that you choose to make your profile publicly visible).

We will use your Personal Data to deliver services to you and/or the institution you work or act for. We may also use your Personal Data to inform you about our services or new investment developments.

Please note that we may use or disclose Personal Data if we are required by law to do so or if we reasonably believe that use or disclosure is necessary to protect our rights and/or to comply with our legal obligations.

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 changes during your relationship with us.

Change of purpose, anonymisation

We will only use your Personal Data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason which is compatible with the original purpose. If we need to use your Personal Data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

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.

With whom will we share your information?

When using your Personal Data for the purposes and on the basis described above we may share your Personal Data with our other Mondrian offices. We may also have to share your Personal Data with regulators, public institutions, courts or other third parties.

For the purposes described above we may have to transfer your Personal Data from the European Economic Area (EEA) to a Mondrian office or a third party outside of the EEA and in a jurisdiction not being subject to an adequacy decision of the European Commission.

Your rights in relation to your information

You have rights as an individual which you can exercise under certain circumstances in relation to your Personal Data that we hold. 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.

If you want to exercise one of these rights please contact us using this form or at the address mentioned at the end of this policy.

You also have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues, or, as the case may be, any other competent supervisory authority of an EU member state.

Data Security

We have implemented appropriate technical and organizational security measures designed to protect your Personal Data against accidental or unlawful destruction, loss, alteration, unauthorised disclosure, unauthorised access, and other unlawful or unauthorised forms of Processing, in accordance with applicable law.

You are responsible for ensuring that any Personal Data that you send to us are sent securely.

Marketing

We may Process your Personal Data to contact you, primarily by mail and email and also on occasion by telephone, so that we can provide you with information concerning products and services that may be of interest, in accordance with applicable law.

If you do not wish to receive marketing communications from us you can opt out at any time by contacting your regular Mondrian contact, or by requesting to be unsubscribed from emails we have sent to you. After you unsubscribe, we will not send you further emails, but we may continue to contact you to the extent necessary for the purposes of any services you have requested.

How long will we retain your information?

We will only retain your Personal Data for as long as necessary to fulfil the purposes for which it was collected and processed, for example where we maintain an ongoing relationship with you (or you are included in our mailing list and have not unsubscribed, or for the purposes of satisfying any legal, regulatory, accounting and reporting requirements.

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.

Changes to this privacy notice

We reserve the right to update this privacy notice at any time, and we will make an updated copy of such privacy notice available on our website.

Further information

If you have any concerns or require any further information, please do not hesitate to contact us using this form or at Mondrian Investment Partners Limited, 5th Floor, 10 Gresham Street, London, EC2V 7JD, 020 7477 7000