



January 2021

Mondrian Investment Partners Limited and Mondrian Investment Partners (U.S.) Inc.'s Privacy Notice for California Residents

Introduction

This Privacy Notice describes how we collect and use Personal Information about you before, during and after your relationship in accordance with applicable data privacy laws and covers the California Consumer Privacy Act (“CCPA”) of 2018, which went into effect on 1 January 2020. It does not cover the European General Data Protection Regulation (GDPR), which is covered by a separate Privacy Notice.

The CCPA grants California residents new rights regarding their Personal Information. This Privacy Notice explains how Mondrian Investment Partners Limited and Mondrian Investment Partners U.S. Inc. (“**Mondrian**”, “**we**”, “**us**”, “**our**”) collects, uses, shares and otherwise processes your Personal Information in connection with your relationship with us as a client, consultant, or other professional third party acting for a client.

Definitions

“**Mondrian**” The term “Mondrian” is intended to mean Mondrian Investment Partners Limited, Mondrian Investment Partners (U.S.), Inc. and its entities. Mondrian is made up of different legal entities and registered in different jurisdictions. This Privacy Notice is issued on behalf of all Mondrian entities.

“**Personal Information**” The term “Personal Information” as used in this Privacy Notice is defined as any information that identifies, relates to, describes, is capable of being associated with or could reasonably be linked, directly or indirectly, with a particular consumer or household”, in particular by reference to an identifier such as a name, location data, contact details and credit card details. Personal Information does not include data from which you can no longer be identified such as anonymised aggregate data.

Should you have any questions about this Privacy Notice you can contact us using this form or at the address following registered address:

Mondrian Investment Partners Limited, 5th Floor, 10 Gresham Street, London, EC2V 7JD, UK, +44 207 477 7000

Mondrian Investments Partners (U.S.) Inc., 201 King of Prussia Road, Suite 620, Radnor, PA 19087, USA, +1 215 825 4500

Supplementary Privacy Policies

Mondrian’s website (www.mondrian.com) has a Privacy Policy that provides information particular to web-based data collection, for example, it covers the use of Cookies. If viewing this Notice via our website, reference should also be made to the separate Privacy Policy.

We may also provide supplemental privacy notices on specific occasions when we are collecting or processing Personal Information 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 Notice may be amended or updated from time to time to reflect changes in our practices with respect to the processing of Personal Information, or changes in applicable law. We encourage you to read this Notice carefully, and to regularly check this page to review any changes we might make in accordance with the terms of this Notice.

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

The Types of Personal Data We Collect

Due to the business relationships we maintain and/or the services we provide, we are required to obtain certain Personal Information. The categories of collection and purpose of collection are below. We have collected this information during the last 12 months.

Please note that certain exemptions apply to your rights and Mondrian’s obligations pursuant to the CCPA. These rights and requirements may not apply in certain situations depending on your relationship with Mondrian’s other legal obligations, and as otherwise provided for in the CCPA.

The CCPA does not apply to certain Personal Information, including information subject to the federal Gramm-Leach-Bliley Act (“GLBA”), which applies to the privacy practices of financial institutions. As a result, this Privacy Notice does not apply with respect to Personal Information subject to the GLBA, such as Personal Information that we collect about California residents who request or obtain financial products or services from us for personal, family, or household purposes, or who invest directly in our advised funds. The CCPA may also not apply where a financial institution shares your Personal Information with us, as that information could be subject to and protected by the GLBA.

The GLBA definition of personally identifiable financial information does not encompass information collected prior to a consumer’s application for a financial product or service, such as that collected through marketing campaigns and promotions, because such information is obtained while promoting, not providing, a financial product or service.

Categories	Examples
Identifiers, such as:	A Real Name, Postal Address, Social Security Number, Drivers’ License, Utilities Bill, or other similar identifiers
Personal Information categories listed in the California Customer Records statute	In addition to the first category above, this would include such categories as that of bank account numbers.
Biometric Information:	CCTV
Internet or other similar network activity	Browsing history, information on a consumer’s interaction with a website.
Sensory data	Telephone recording
Inferences drawn from other Personal Information	Profile reflecting a consumer’s preferences and behavior. This is only undertaken on an anonymized basis.

The purposes of this collection are as follows:

- To respond to, and send out, direct marketing.
- To respond to queries on the form on Mondrian’s website
- To collect information on the Mondrian website – please read in conjunction with Mondrian’s Privacy Policy on our website.
- To identify Personal Information or create aggregated datasets, such as for consolidating reporting, research, or analytics
- For legal and regulatory compliance, including all uses and disclosures of Personal Information required by law or reasonably needed for compliance with our policies and procedures, such as: anti-money laundering programs
- To accept subscriptions and manage investments in our funds, such as our Limited Partnerships, made by individuals
- To record the investors data for various disclosures (no individuals are referenced in the disclosures)
- To provide services such as pertinent communications as part of account management services
- To ensure security at our physical offices, ie in the case of CCTV footage if you visit us at our offices
- To satisfy Mondrian’s regulatory obligations which may entail recording telephone conversations with you.

We collect the Personal Information 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, such as on Mondrian’s website.

Accuracy of information

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

Anonymization

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

With whom will we share your information?

When using your Personal Information for the purposes and on the basis described above we may share your Personal Information with our other Mondrian offices. We may also have to share your Personal Information with regulators, public institutions, courts or other third parties. Please also refer to the Privacy Policy on www.mondrian.com, covering such third-party tools as Google Analytics.

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 Information that we hold; these are known as Rights Requests. These rights are to:

- Request disclosure of your Personal Information (including the categories and specific pieces of Personal Information we have collected), and for portability
- Request deletion of Personal Information collected, subject to certain exceptions (for example, if we are required to retain your information in order to satisfy a legal obligation).
- Opt-out of Personal Information Sales (please refer to www.mondrian.com for a copy of the Privacy Policy covering website data collection and analytics tools. When an application runs adds or makes statistical analyses on traffic, it is a sale for purposes of the CCPA)

Consumers may only make most information and data portability requests twice a year and only for a 12-month look-back. There is no restriction on the number of requests relating to limits on deletion and do not sell my data. We will not return Personal Information outside the scope of the CCPA in response to an access request (ie that is covered by the GLBA), except as otherwise required by law.

We will not request reauthorization to sell your Personal Information for at least 12 months after you have opted-out.

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 notice.

We will respond to your request within 45 days of its receipt, where possible to do so.

Data Security

We have implemented appropriate technical and organizational security measures designed to protect your Personal Information 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 information that you send to us are sent securely.

Marketing

We may Process your Personal Information to contact you, primarily by 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.

We provide the option to unsubscribe or opt-out of further communication on each electronic marketing communication sent to you, which you can exercise by following the unsubscribe instructions provided in the email you receive. You can also opt-out of further communications by contacting us directly using the contact details provided in this Notice or by contacting your regular Mondrian contact. 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 Information 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.

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, UK, +44 207 477 7000.

We are also contactable at Mondrian Investments Partners (U.S). Inc., 201 King of Prussia Road, Suite 620, Radnor, PA 19087, USA, +1 215 825 4500.