



January 2021

Mondrian Investment Partners Limited Privacy Notice



Introduction

This Privacy Notice explains how Mondrian Investment Partners Limited (“**Mondrian**”, “**we**”, “**us**”, “**our**”), of 10 Gresham Street, London, EC2V 7JD, 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, including the General Data Protection Regulation (“GDPR”) which became applicable as of 25 May 2018 and the new United Kingdom General Data Protection Regulation (UK GDPR), which came into effect on 1 January 2021 (“collectively GDPR”). As of 1 January 2021, the UK GDPR together with the amended Data Protection Act of 2018 (“DPA”) and Privacy and Electronic Communications Regulations 2003 (“PECR”) comprises the personal data protection legislation in the UK. A supplementary Privacy Notice covers the recent US California Consumer Privacy Act (“CCPA”).

Definitions

“**Data Controller**” and “**Data Processor**” The term “Data Controller” is intended to mean an entity that exercises overall control over the purposes and means of the processing of Personal Data. Data Processors act on behalf of, and only on the instructions of, the relevant controller.

“**Mondrian**” The term “Mondrian” is intended to mean Mondrian Investment Partners Limited 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, 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.

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, +44 207 477 7000.

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. Separate policies exist covering the Personal Data of Job Applicants and Employees.

We may also 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.

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

We collect and use information about you if you visit our website, utilise our services, make client enquiries or send other communications, apply for jobs at Mondrian, register for information or when you respond to communications by us

Your relationship with us will determine why we collect particular information about you and this is covered in more detail overleaf.

We may use third parties as Data Processors (within the meaning of GDPR) as part of the services we provide.

The types of Personal Data we may collect in the ordinary course of business 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, and in order to satisfy Mondrian's regulatory obligations, we may also in some circumstances record telephone conversations with you.

The Basis for Processing

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 you have given clear consent for us to process your Personal Data for a specific purpose;
- b. if we need it to perform the contract we have entered into with you;
- c. if we need it to comply with a legal obligation;
- d. 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
- e. 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 United Kingdom to a Mondrian office or a third party outside of the United Kingdom. GDPR requires that arrangements such as Standard Contractual Clauses are in place in order for the transfer of data to be made securely and with appropriate protections in place.

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;
- request data portability
- 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. We will comply with your request where it is feasible to do so, within 30 days of receiving your request.

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. For more information please visit the Information Commissioner's office at www.ico.org.uk/ concerns or call them on 0303 123 1113.

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.

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 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, +44 207 477 7000.