

## **PRIVACY NOTICE**

### **Stewart Investors**

#### **Background**

This Notice gives information on how Stewart Investors collect, use and protect the personal data held about investors, clients, intermediaries and other business contacts.

This Notice describes how we will fulfil our obligations under applicable data protection laws, including Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 (the **General Data Protection Regulation** or **GDPR**).

#### **Information about us**

Stewart Investors is a trading name for the companies listed below. References in this Notice to Stewart Investors will include these companies as well as the EU based group company investment funds that they manage (as applicable):

**First Sentier Investors (UK) Funds Limited\***

**First Sentier Investors (UK) IM Limited\***

**First Sentier Investors (UK) Services Limited**

**First Sentier Investors Europe Holdings Limited**

**First Sentier Investors International IM Limited\***

**First Sentier Investors (Ireland) Limited\*\***

(together "we", "us" or "our")

\*Authorised and regulated by the Financial Conduct Authority of the United Kingdom

\*\*Authorised by the Central Bank of Ireland

#### **Information we may collect**

Stewart Investors collects from time to time, personal data on investors, clients, intermediaries and other business contacts from a number of sources, including from: investor application forms; other Stewart Investors forms (including website forms); client investment management agreements; correspondence, conversations with clients, advisers, intermediaries; business cards; third party service providers to our funds (for example, transfer agents, administrators, distributors, custodians, paying agents); client advisers; other third parties; and from public sources. This information may be collected directly from investors, clients, intermediaries and business contacts, or indirectly from third parties, as follows:

##### **From you**

We may collect from you and process the following personal data, depending on the nature of our business relationship with you:

- Your name; address (including proof of name and address); photo identification; contact details both personal and work (for example, your email and phone numbers); hobbies and interests; job title and company; nationality; citizenship; tax residency; date of birth; passport details; national insurance number and other tax details; adviser details;

investment details; banking details; signed contracts with you; business cards, contact sheets and biographies; financial dealings; family connections; details of your company's directors, secretaries, authorised signatories and identification documents; details of any complaints made; data received from due diligence activities (such as anti-money laundering, politically exposed persons and sanctions checks); responses to surveys and competitions; fraud enquiries (for example, information from police reports); images captured by CCTV cameras on our premises; recordings of telephone conversations and electronic communications with our staff.

- By the use of **cookies** on this site in accordance with our ***Cookies Policy*** set out below.

### **From third parties**

We may collect personal data about you from third parties, depending on the nature of our business relationship with you, in particular:

- **Third party service providers to our funds** (for example, transfer agents, registrars, administrators, distributors, custodians and paying agents) – information received includes personal details of investors obtained from fund application forms such as: name; address; contact details; nationality; national insurance number; date of birth; tax residency; adviser details; investment details; bank account details.
- **Your advisers (including independent financial advisers)** – information received may include your name, address, gender, date of birth; bank details.
- **Our vendors** such as Experian and World-Check – information received includes the results of “Know Your Client”, anti-money laundering, politically exposed persons and sanctions checks.
- **Publically available sources** such as MandateWire and LinkedIn – information available includes contact details of institutional investors (MandateWire) and details of job title, company, former employers and roles, and connections (LinkedIn).

### **How we will use the information we collect**

The information we collect and use will depend on the nature of our business relationship with you, as follows:

- In relation to **prospective investors and clients**, we may process personal data for identification purposes (prior to becoming an investor in our funds or a client of ours under an investment management agreement), for the purposes of anti-money laundering, counter terrorist financing, suitability and appropriateness assessments, “Know Your Client” and credit-worthiness checks, and for any other applicable legal or regulatory reasons. Failure to provide relevant information will mean that we will not be able to on-board a potential investor or client.

- In relation to **investors in our funds**, we may process information collected for the purpose of account administration and other general business purposes (for example, for processing subscriptions and investments; maintaining the share register of investors, carrying out investor instructions; handling any complaints and enquiries; sending investor communications, including financial reports, valuations, corporate actions). In addition, in order to comply with regulatory obligations, we may collect and disclose certain information about our investors and certain related persons and their investments to HM Revenue & Customs and/or other relevant tax authorities overseas.
- In relation to our **investment management clients**, we may process personal data for the purpose of managing and administering clients' accounts, including providing valuations and periodic reports and informing clients of relevant information as required by the investment management agreement.
- We may from time to time process personal data of **investors and clients** to comply with legal and regulatory requirements impacting our business. In particular, we may need in the context of our business: to obtain legal advice on legal and regulatory requirements; to report to relevant regulators; to comply with market opening and registration requirements in the conduct of our business.
- In relation to **intermediaries who introduce investors into our funds** (such as distributors, platforms and independent financial advisers), we may process personal data to conduct market research, gauge product sales or product performance or assess the creditworthiness of intermediaries. In addition, we may process the personal data of investors introduced to our funds, as outlined above.
- In relation to our **general business contacts** (including consultants and intermediaries who act for our mutual clients), we may process personal data for general business purposes such as: for public relations and corporate communications purposes; providing thought leadership articles; networking/relationship building; conducting market research and gathering industry statistics; evaluating products and services; and assisting with any queries.
- **Monitoring purposes:** we may process personal data to analyse the performance of IT systems, monitor usage of resources and systems and to improve products, services and usability of our technology platform, including telephone calls and electronic communications with our staff which may be recorded for the purposes of retaining a record of communications, in the interests of security, for training and compliance monitoring purposes and/or to comply with legal or regulatory obligations.
- **Where you have provided your consent, we may process your personal data for the purposes of informing you (for example, by telephone, mail and email) about other products and services available from Stewart Investors and of marketing campaigns and event invitations.**

We are entitled to use your personal data in these ways because:

- We have legal and regulatory obligations that we have to discharge;
- We may need to in order to establish, exercise or defend our legal rights or for the purpose of legal proceedings;
- The use of your personal data as described is necessary for our legitimate business interests (or the legitimate interests of one or more of our affiliates);
- The use of your personal data is necessary for the performance of a contract with you;
- You have provided your consent to us processing your personal data (other than for marketing purposes); or
- **You have provided your consent to us processing your personal data for the purposes of informing you (for example, by telephone, mail or email) about other products and services available from Stewart Investors and of marketing campaigns and event invitations.**

### Disclosure of your information

- We may disclose your personal data to any member of the Stewart Investors group, which means our affiliates, for internal business and administrative purposes (including to administer our products and services and for prudential and risk management purposes) and, **where you have given your consent**, to provide you with information on related products and services. We may also disclose personal data relating to our clients to members of our group to whom we sub-delegate our services (for example, trade order execution and portfolio management).
- We may disclose your personal data to third parties that are specifically engaged by us to provide services to us, in which case we will require those parties to keep that information confidential and secure and to use it solely for the purpose of providing the specified services to us. The following is a list of the types of third parties who process your personal data on our behalf:
  - third party service providers to our funds (for example, transfer agents, administrators, distributors, custodians, paying agents and researchers)
  - credit reference agencies, debt collection agencies and other companies for use in credit decisions, for fraud prevention, to pursue debtors and for the verification of identity
  - document execution vendors in relation to the execution of contracts with our clients;
  - insurance brokers;
  - professional advisers (for example, accountants/tax advisors and legal advisors).
- If you use a financial adviser (as indicated on your investor application form), then details of your investments and valuations may also be provided to such financial adviser.
- We may disclose to relevant tax authorities, regulators, government departments or competent authorities of the UK or of other countries, any personal data (including tax status, identity or residency or other personal and payment information, documents or self-certifications) in order to comply with a court order or to meet legal and regulatory

requirements arising in the conduct of our business. Such disclosure may be made directly to such regulators or competent authorities or made indirectly to our advisers or providers who will make such filings or disclosures on our behalf.

### **Transfers outside the EEA**

We may transfer your personal data to our overseas affiliates (including outside the EEA) and/or allow the information to be accessed by our affiliates and their employees outside the EEA as well as within it. It may also be processed by personnel operating outside the EEA who work for us or for one of our third party service providers.

Where we transfer your personal data outside the EEA, we will ensure that it is protected in a manner that is consistent with how your personal data will be protected by us in the EEA or that the transfer is otherwise compliant with data protection laws. This can be done in a number of ways, for example:

- the country that we send the data to might be approved by the European Commission;
- the recipient might have signed up to a contract based on “model contractual clauses” approved by the European Commission, obliging them to protect your personal data;
- where the recipient is located in the US, it might be a certified member of the EU-US Privacy Shield Scheme;
- where data protection laws permit us to transfer your personal data outside the EEA.

You can obtain more details of the protection given to your personal data when it is transferred outside the EEA (including a copy of any standard data protection clauses which we have entered into with recipients of your personal data) by contacting [communications@stewartinvestors.com](mailto:communications@stewartinvestors.com)

### **How long will we store your data?**

Personal data held by us will be kept confidential. How long we hold your personal data for will vary and will be determined by various criteria, including:

- the purpose for which we are using it – we will need to keep the data for as long as is necessary for that purpose; and
- legal obligations – laws or regulation may set a minimum period for which we have to keep your personal data.

### **Your rights in relation to your data**

**If you wish to contact us for any of the reasons below, please e-mail us at [communications@stewartinvestors.com](mailto:communications@stewartinvestors.com)**

- You have a **right to access** the information which we hold about you. If you wish to make an application to access or obtain this information, please contact us. In some circumstances, you have the right to receive some personal data in a structured, commonly used and

machine-readable format and/or request that we transmit that data to a third party where this is technically feasible. Please note that this right only applies to personal data which you have provided to us.

- We take reasonable steps to ensure that the personal data we collect, use or disclose is **accurate, complete and up to date**. Please contact us if any of the details you have provided change. Please also contact us if you believe that the information we have about you is not accurate, complete or up to date.
- If you wish us to **erase or restrict** using your data, please contact us. We may need to discuss with you the basis of your request as there may be circumstances where we are legally entitled to continue processing your personal data/refuse your request.
- If you have previously provided your consent to our use of your data (other than for marketing purposes) and you wish to **withdraw such consent**, please contact us. We may need to discuss with you whether our use of your data needs to continue for lawful purposes (i.e. because we have another legitimate reason (other than your consent) for doing so).
- **If you have previously consented to being sent information about other products and services available from Stewart Investors, you may withdraw such consent by contacting us.**
- If you have any **complaints** in relation to the way we have used your information, please contact us in the first instance. You also have the right to lodge a complaint with the **Information Commissioner's Office** at Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF (Tel: 0303 123 1113) if you think that any of your rights have been infringed by us.

### **Other Products and Services**

- If you would like to receive further information from us about other products or services offered by Stewart Investors, please ensure you tick the relevant box on the appropriate application form or contact us by e-mailing us at [communications@stewartinvestors.com](mailto:communications@stewartinvestors.com)

### **Cookies Policy**

Cookies are small data files that are sent to and stored on your computer, smartphone or other device used to access the internet, whenever you visit a website. We use cookies to enable and improve certain functions on our website and gain feedback on how our website is used. If you choose to switch certain cookies off, it will affect how our website works.

Cookies are useful because they allow a website to recognise the browser you are using. As Stewart Investors operates in various jurisdictions, we use cookies to store general information such as the region where you are based. This helps us to tailor our website to better suit your requirements. The Cookies we use here are 'session' cookies and will be removed every time you leave our website.

We use analytics cookies to collect information on website activity (such as the number of users who visit our website, the date and time of visits, the number of pages viewed, navigation patterns, what country and what systems users have used to access the site and, when entering our website from

another website, the address of that web site). This information on its own does not identify an individual but it does provide us with statistics that can be used to analyse and improve our website.

The browsers of most computers, smartphones and other web-enabled devices are usually set up to accept cookies. If your browser preferences allow it, you can configure your browser to accept all cookies, reject all cookies, or notify you when cookies are set. Each browser is different, so check the "Help" menu of your browser to learn about how to change your cookie preferences.

However, please remember that cookies are often used to enable and improve certain functions on our website. If you choose to switch certain cookies off, it will affect how our website works and certain functionality may not work.

More information about cookies can be found on [allaboutcookies.org](http://allaboutcookies.org)

Please note that third parties (including, for example, advertising networks and providers of external services like web traffic analysis services) may also use cookies, over which we have no control. These cookies are likely to be analytical/performance cookies or targeting cookies.

You can find more information about the individual cookies that we use and the purposes for which we use them below:

<u>Cookie</u>	<u>Cookie Name</u>	<u>Purpose</u>
<b>Google Analytics *</b>		<p>Google Analytics use third and first-party cookies to collect information about how visitors use our website, helping us to optimise user experience.</p> <p>The duration of the Google cookies, and further information about Google cookies, can be found at <a href="https://developers.google.com/analytics/devguides/collec tion/analyticsjs/cookie-usage">https://developers.google.com/analytics/devguides/collec tion/analyticsjs/cookie-usage</a></p> <p>Details of Google's privacy policy is here: <a href="https://support.google.com/analytics/answer/6004245">https://support.google.com/analytics/answer/6004245</a></p>
	<b>_ga</b>	This persistent cookie is used to distinguish users and expires after two years.
	<b>_gid</b>	This persistent cookie is used to distinguish users and expires after 24 hours.
	<b>_gat</b>	This persistent cookie is used to throttle the request rate (limiting the collection of data on high traffic sites) from Google Analytics. It expires after 10 minutes.
	<b>_utma</b>	This persistent cookie is used to distinguish users and sessions. The cookie is created when the javascript library executes and no existing __utma cookies exists. The cookie is updated every time data is sent to Google Analytics and expires after 2 years.
	<b>_utmb</b>	This persistent cookie is used to determine new sessions/visits. The cookie is created when the javascript library executes and no existing __utmb cookies exists. The cookie is updated every time data is sent to Google Analytics and expires after 30 mins.

	<b>_utmc</b>	This session cookie operates in conjunction with the __utmb cookie to determine whether the user is in a new session/visit. This cookie expires at the end of the browser session.
	<b>_utmz</b>	This persistent cookie stores the traffic source or campaign that explains how the user reaches our site. The cookie is created when the javascript library executes and is updated every time data is sent to Google Analytics. This cookie expires after 6 months.
<b>Google Tag Manager *</b>	<b>dc_gtm_</b>	Google Tag Manager is used to manage all scripts on the website. This persistent cookie expires after 10 minutes. You can find more information about the types of cookies used by Google here: <a href="https://www.google.com/policies/technologies/types/">https://www.google.com/policies/technologies/types/</a>
<b>New Relic*</b>		New Relic cookies are third party cookies that allow us to monitor performance and availability of our website. More information can be found about the cookies that New Relic uses here: <a href="https://docs.newrelic.com/docs/browser/new-relic-browser/page-load-timing-resources/new-relic-cookies">https://docs.newrelic.com/docs/browser/new-relic-browser/page-load-timing-resources/new-relic-cookies</a>
	<b>NREUM</b>	For browsers that do not implement the Navigation Timing Specification API, New Relic relies on the NREUM cookie and the browser agent to collect timing information. This cookie expires at the end of the browser session.
	<b>NRAGENT</b>	This cookie is used to communicate between the New Relic collector aggregating end user metrics and the agent(s) running in the associated web application. A token identifies and correlates application tier transaction traces with corresponding browser traces. This cookie expires at the end of the browser session.
	<b>JSESSIONID</b>	The JSESSIONID cookie is used to store a session identifier so that New Relic can monitor session counts for an application. This cookie expires at the end of the browser session.
<b>Mouseflow*</b>		Mouseflow is a third party session replay and heatmap tool that shows how visitors click, move, scroll, browse, and pay attention on websites. This provides us with information that allows us to improve the user experience. More information can be found about the cookies that Mouseflow uses here: <a href="http://help.mouseflow.com/knowledge_base/topics/what-is-your-cookie-policy">http://help.mouseflow.com/knowledge_base/topics/what-is-your-cookie-policy</a>
	<b>mf_[Session]</b>	1 <sup>st</sup> party cookies, session lifetime: A cookie for identifying the browser session.



	<b>mf_user</b>	1 <sup>st</sup> party cookie, persistent: A cookie for checking if the user is new or returning.
<b>Cloudflare*</b>		Cloudflare is a third party that provides content delivery network services for our website. A content delivery network or content distribution network (CDN) is a geographically distributed network of proxy servers and their data centres. The goal is to distribute service spatially relative to end-users to provide high availability and high performance. More information can be found about the cookies that Cloudflare uses here: <a href="https://support.cloudflare.com/hc/en-us/articles/200170156-What-does-the-Cloudflare-cfduid-cookie-do-">https://support.cloudflare.com/hc/en-us/articles/200170156-What-does-the-Cloudflare-cfduid-cookie-do-</a>
	<b>__cfduid</b>	The __cfduid cookie is used by Cloudflare to identify individual clients behind a shared IP address and apply security settings on a per-client basis.
<b>Microsoft Azure*</b>		Microsoft Azure provides a cloud hosting platform for our website. The third party cookies that the platform uses are described below.
	<b>ARRAffinity</b>	ARRAffinity is a cookie used to affinitize a client to an instance of an Azure Web App. e.g. if an app is scaled out to 10 instances, and a user accesses it from their browser, the ARRAffinity helps keep the user going back to the same app instance, instead of getting a random instance each time. This can be useful for some apps that keep user state in memory.
<b>Region</b>	<b>Region</b>	This cookie is used to store and determine the region location selected by the user.

*\*Third party cookies subject to change*

### **Links to other web sites**

Our web site may contain links to non-Stewart Investors web sites. While such links are provided for your convenience, you should be aware that the information handling practices of the linked web sites might not be the same as ours. You should review any privacy policies on those linked websites. We are not responsible for any linked websites.

### **Recording of telephone conversations and electronic communications**

Please note that we are required to record telephone conversations (we will do so without a warning) and to keep copies of electronic communications. We are required to keep copies of these recordings and electronic communications for a period of five years (or up to seven years at the

request of a regulator). Copies may be provided to you upon request by contacting [communications@stewartinvestors.com](mailto:communications@stewartinvestors.com)

### **Changes to our Privacy Notice**

This Notice was updated in September 2020. We reserve the right to change this Notice at any time. We will ensure that any changes to this Notice are added to the Notice available on our website on their effective date.