



# Data Privacy Statement

## **Duties of disclosure upon collection of personal data from the data subject in accordance with the Data Protection Legislation.**

The Aventicum Group has issued this Privacy Statement in light of the enactment of Data Protection Legislation. Data privacy is important – please read the statement below.

If you are an individual, this will affect you directly. If you are an institutional investor that provides us with personal data on individuals connected to you for any reason in relation to your investment with us, this will be relevant for those individuals and you should transmit this document to such individuals or otherwise advise them of its content.

With the following information, we would like to give you an overview of how we will collect and process your data and of your rights according to data privacy laws. The details on what data will be processed and which method will be used depend significantly on the services applied for or agreed upon.

In this document, "we", "us" and "our" refer to the Aventicum Group, its Funds and its affiliates and delegates.

**“Data Protection Legislation”** means any law and/or regulation (including guidance and codes of practice issued by authorized data protection regulators) in the UK and/or EU which is applicable to the processing of your personal data by us, and which shall include, but is not limited to the EU General Data Protection Regulation

(2016/679) (“GDPR”), all relevant EU member states' national legislation amending and/or supplementing the GDPR and the UK data protection law including but not limited to the UK Data Protection Act 2018 and (subject to entering into effect) the UK Data Protection, Privacy and Electronic Communications (Amendments etc.) (EU Exit) Regulations 2019 (all as may be amended, extended, consolidated or re-enacted from time to time).



## 1. Who Is Responsible For Data Processing & How Can I Contact Them?

The legal entities within the Aventicum Group responsible for the processing of your personal data are:

- Aventicum Capital Management (UK) LLP
- Aventicum Real Estate LLP

Of: 4 Sloane Terrace, London SW1X 9DQ

Should you have any queries or wish to discuss your data protection rights with us, please contact:

The Data Protection Office  
Five Canada Square  
London  
E14 5AQ  
United Kingdom

Phone:  
+44 20 7888 8888

E-mail:  
uk.data-protection@credit-suisse.com

Important note: when contacting our Data Protection Office, please ensure that you specify the correct legal name of the Aventicum entity or establishment to which your query relates.

## 2. What Sources & Data Do We Use?

We process personal data that we obtain from our clients in the context of our business relationship, for example investments within funds. We also process – insofar as necessary to provide our services – personal data that we obtain from publicly accessible sources, (e.g. Companies House, press, internet) or that is legitimately transferred to us from other third parties (e.g. a credit ratings agency).

In order to facilitate, enable and/or maintain our business relationship, we may collect and otherwise process personal data relating to clients and any other person(s) involved in the business relationship, as the case may be, such as

authorised representative(s), shareholders, investors, clients, beneficial owners or agents, if different from the client, each an “Affected Person”.

Personal data captured includes the following information relating to you and/or “Affected Persons” including name, corporate contact information, signature and correspondence records.

## 3. What Do We Process Your Data For (Purpose of Processing) & On What Legal Basis?

We process personal data in accordance with the provisions of Data Protection Legislation.

### a. For fulfillment of contractual obligations

Data is processed in order that we may provide the services for which we are engaged or to carry out pre-contractual measures necessary under the applicable regulations

### b. In the context of balancing interests

We may process your data beyond the scope of our strict engagement for the purposes of the legitimate interests pursued by us or a third party. Examples:

- Reviewing and optimizing procedures for needs assessment for the purpose of direct client discussions.
- Marketing, unless you have objected to the use of your data.
- Asserting legal claims and defense in legal disputes.
- Guarantee of the company's IT security and IT operation.
- Prevention and clarification of crimes.
- Measures for business management and further development of services and products.
- Risk control.
- Video surveillance and measures to protect the rights of an owner of premises to keep out trespassers and

to provide site security (e.g. access controls).

### c. As a result of your consent

As long as you have granted us consent to process your personal data for certain purposes (e.g. analysis of trading activities for marketing purposes), then such processing is permissible under the law on the basis of your consent. Please note your consent can be withdrawn at any time.

Withdrawal of consent does not affect the legality of data processed prior to withdrawal.

### d. Due to statutory provisions or in the public interest

Furthermore, as an asset manager, we are subject to various legal obligations, meaning statutory requirements (e.g. money laundering regulations and various tax laws).

The purposes of processing include identity checks, fraud and money laundering prevention (including beneficial owners), tax reporting purposes, in response to legal requests or requests from regulatory authorities, fulfilling control and reporting obligations under financial regulation, and measuring and managing risks.



#### **4. Who Receives My Data & Confidentiality Requirements?**

We are under a duty of confidentiality to our clients and to prospective clients and are obliged to maintain confidentiality regarding all client-related matters and assessments of which we acquire knowledge.

The following paragraphs set out details on where we transfer client personal data to and the purpose for any such transfer.

##### **a. External recipients of data**

We may transfer personal data about you in the course of conducting our usual business, or if legal, regulatory or market practice requirements demand it to the following external recipients, or if you have given your consent (e.g. to process a financial transaction you have ordered us to fulfil) for the following purposes:

- To public entities and institutions (e.g. financial authorities such as the Bank of England, Financial Conduct Authority, and law enforcement agencies) either upon providing a legal or regulatory request or as part of our legislative and regulatory reporting requirements. They, in turn, may exchange this information with other financial regulators including tax authorities located outside the EEA.
- To third parties (for example funds, fund administrators, fund managers, exchanges, trade repositories, processing units and third-party custodians, issuers, authorities, and their representatives) for the purpose of ensuring that we can meet the requirements of applicable law, contractual provisions, market practices and compliance standards in connection with transactions you enter into and the services that we provide you with.

##### **b. To service providers and agents**

We may transfer your personal data to service providers and agents appointed by us for the purposes given (including anti-money laundering and know your client checks and risk control), subject at all

times to such third parties being under a duty themselves to preserve confidentiality.

These are companies in the categories of banking services, IT services, logistics, printing services, telecommunications, collection, advice and consulting, and sales and marketing.

Aventicum Group and its entities has implemented appropriate organisational and technical safeguards to protect the personal data for which it acts as data controller at all times.

#### **5. Will Data Be Transferred to a Third Country or an International Organisation?**

Data transfer to legal entities in states outside the UK, European Union and states with Data Protection Legislation deemed adequate by the European Commission (together known as "third countries") takes place so long as:

- It is necessary for the purpose of carrying out your orders (e.g. payment and securities orders).
- It is required by law (e.g. reporting obligations under financial regulation).
- To fulfil our legitimate interests (as described in section 3).
- Where you have granted us your consent.

You understand that the Data Protection Legislation outside the UK or European Union may not give you as much protection as the Data Protection Legislation inside the UK or European Union.

Please contact the Data Protection Officer if you would like to request to see a copy of the specific safeguards applied to the export of your information.

#### **6. For How Long Will My Data Be Stored?**

We will process and store your personal data for as long as it is necessary in order to fulfill our contractual, regulatory and statutory obligations.

We will assess and respond to any request by a data subject, to delete data. We will delete data provided that the data is no longer required in order to fulfill contractual, regulatory or statutory obligations, or the fulfilment of any obligations to preserve records according to the law.

We will normally retain your records for a minimum of ten years to comply with regulatory and contractual requirements unless there is a particular reason to hold the records for longer, including legal hold<sup>1</sup> requirements, which require us to keep records for an undefined period of time.

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<sup>1</sup> A legal hold is a process that an organization uses to preserve all forms of relevant information when litigation is reasonably anticipated.



## 7. What data privacy rights do I have?

Each data subject has in relation to their personal data:

- The right of access.
- The right to rectification.
- The right to erasure.
- The right to restrict processing.
- The right to object.
- The right to data portability.
- The right to object to data processing for direct marketing purposes. In individual cases, we process your personal data in order to conduct direct marketing. You have the right to object to the processing of your personal data for the purpose of this type of marketing at any time. This also applies to profiling, insofar as it is in direct connection with such direct marketing. If you object to processing for the purpose of direct marketing, we will no longer process your personal data for this purpose.
- Individual right of objection on grounds relating to your particular situation. You shall have the right of objection to processing of your personal data at any time. If you submit an objection, we will no longer process your personal data unless we can give evidence of mandatory, legitimate reasons for processing, which outweigh your interests, rights, and freedoms, or processing serves the enforcement, exercise, or defense of interests. Please note, that in such cases we will not be able to provide services and maintain a business relationship.

Any requests in relation to exercising your data privacy rights do not need to be made in a particular form however, it should be addressed to:

The Data Protection Office  
Five Canada Square  
London  
E14 5AQ  
United Kingdom

Phone:  
+44 20 7888 8888

E-mail:  
uk.data-protection@credit-suisse.com

If applicable, you also have a right to make a complaint to the relevant data protection regulator.

## 8. To What Extent Is There Automated Decision Making?

In establishing and carrying out a business relationship, we generally do not use any fully automated decision-making. If we use this procedure in individual cases, we will inform you of this separately, provided this is a legal requirement.

## 9. Will Profiling Take Place?

We may process some of your data for the purposes of profiling. We use profiling in the following ways:

- Due to legal and regulatory requirements, we are required to combat money laundering, terrorism financing, fraud, assess risk and offences that pose a danger to assets.
- Data assessments (including on payment transactions) are also carried out for this purpose. At the same time, these measures also serve to protect you.
- We use assessment tools in order to be able to specifically notify you and advise you regarding products.

## 10. Do You Collect Biometric Data?

Biometric data is classified as sensitive personal data. Therefore your explicit consent will be required in a separate process to use your Touch ID or other biometric identification to access certain applications.