Introduction and Purpose

The General Data Protection Regulation ("GDPR") governs the controlling and processing, such as the use or holding, of personal data, which is essentially any information about identifiable living individuals, and also gives those individuals certain rights and remedies in respect of that information.

The purpose of this notice is to tell you what to expect us to do with your personal information when you make contact with us or use one of our services. This will lay out the essentials such as the what; where; when; and how in relation to the personal information collected. This should help you feel more confident about the privacy and the security of your personal information.

Please read this Privacy Notice carefully. By visiting our website or using any of our services, you indicate your agreement to our use of your personal information as set out in this Privacy Notice.

Identity and contact details of the Data Controller

CSL Capital (UK) Ltd ("CSL") (company number 11818051) whose registered office is at 11 Upper Grosvenor Street, London, W1K 2NB, United Kingdom is the Data Controller and is committed to protecting the rights of individuals in line with the GDPR.

Contact details of the Data Protection Officer

CSL has a Data Protection Officer who can be contacted on info@cslcapitaluk.com. This individual has oversight responsibility for the usage and processing of personal data. Any questions relating to data security should be directed to the Data Protection Officer.

Information we collect about you When do we collect information?

We will collect information from you when you register with us, apply to use any of our services, become our client, or contact us in person, by telephone, by email or by post. We also collect information from you when you provide feedback or complete a contact form on our website.

We may collect information about you from fraud prevention agencies and other organisations when we undertake checks such as identification verification checks, as explained further below.

What information will we collect and why?

We may collect the following information depending on the service provided:

- Your contact details, such as your name, address, telephone number and email address;
- Your date of birth, nationality, country of birth, country of residence, employment status and tax identification number (i.e. National Insurance Number);
- Passport details, driving licence and utility bills;
- Details of the services you request from us;
- Any records held by financial crime prevention agencies, on the Electoral Register and by providers of utility services; and
- Details of your employment status, income and source of wealth.

In some cases, you are not obliged to provide any personal data to us, but if you have requested information or a service from us, we will not be able to provide it without certain information, such as your contact details. Before we can begin providing you with our services, we need to obtain certain information about you, so that we can verify your identity in order for us to meet our obligations under the Money Laundering, Terrorist Financing and Transfer of Funds Regulations 2017 and any other applicable legislation and for the purposes of crime prevention and fraud prevention. **You are obliged to provide this information and if you do not provide it, we will be unable to provide you with our services.**

We also collect information from you when you voluntarily complete customer surveys, provide feedback or complete a

© CSL Capital (UK) Ltd 2020

contact form on our website.

Cookies

Our Website makes use of cookies. Cookies are files which our server uses to identify your computer. Cookies cannot identify which person is using the computer.

CSL uses cookies to understand site usage and to improve the content and offerings on our site. For example, we may use cookies to personalise your experience on our web pages and to provide you with a better service.

Cookies can only be placed on a computer where the user has given their express consent. You can choose to accept or decline cookies when you first access our Site. We require you to indicate your choice via an automated "pop-up" box, which explains the cookies we use and what we use them for. Most web browsers automatically accept cookies, but you can also usually modify your browser setting to decline cookies if you prefer. If you decline to accept our use of cookies or set your web browser to decline their use, you will have only limited functionality in the use of our site.

Automated Processing

CSL does not make use of automated processing or decision making.

How will we use your information?

We use information held by you in the following ways:

- To process your application to use our services;
- To undertake checks such as identification verification checks with fraud prevention agencies to enable us to comply with our anti-money laundering obligations and for the purposes of crime prevention and fraud prevention;
- To comply with our obligations arising from any contracts entered into between you and us and to provide you with the information, products and services that you request from us;
- To help protect your information and prevent unauthorised access to it;
- To deal with any queries, complaints or problems reported by you;
- To generate statistics relating to use of our website, such as the popularity of certain features or services. We do not use personally identifiable information for these purposes;
- if required to do so by law and to the extent necessary for the proper operation of our systems, to protect us/our customers, or for the enforcement of any agreement between you and us;
- to notify you of changes to our services; and
- to help improve the services we provide to you.

We may also use this information to provide you with information about other services we offer that are similar to those that you have already engaged us to provide, or enquired about, or to provide information about CSL by way of news letters or emails.

In such instances CSL will only do so where we have either received consent from you or we have assessed that there is a legitimate interest for us to send you the communication. When assessing legitimate interest, we will balance our interests with your rights and will only send communications where you would reasonably expect to hear from us. **You may opt out of receiving this information when we collect details or at any time by contacting us using the contact details below**

How will we protect your information?

We take appropriate security measures (including physical, electronic and procedural measures) to help protect the confidentiality, integrity and availability of your personal information from unauthorised access and disclosure.

Who would we disclose your information to?

We may disclose your information to:

- Businesses that are legally part of the same group of companies within CSL, or that become part of that group;

© CSL Capital (UK) Ltd 2020

- Our brokers, dealers, IT providers, services providers and agents in order to provide and maintain the provision of the services;
- Our appointed auditors, accountants, lawyers and other professional advisers (e.g. compliance consultants), to the extent that they require access to the information in order to advise us;
- Fraud prevention agencies and other organisations to allow us to undertake the checks set out below. We will supply details of such agencies on request;
- Providers of investments or services we recommend, including investment platforms, discretionary management services, or other such products or services. We may also be required to share information with auditors appointed by the providers of such products or services;
- The regulators, the Financial Conduct Authority, or any relevant regulatory authority where they are entitled to require disclosure;
- Meet applicable law, the order of a Court or market rules and codes of practice applicable to the circumstances at the time;
- Investigate or prevent fraud or activities believed to be illegal or otherwise in breach of applicable law;
- Relevant tax, payments and customs authority, who may pass this on to tax authorities in other jurisdictions. The is tax regulations require us to collect information about each investor's tax residency;
- prospective seller or buyer of such business or assets in the event that we sell or buy any business or assets, in which case we will disclose your personal information. If all of CSL's assets are acquired by a third party, in which case personal information held by it about its clients may be one of the transferred assets.

We will not lend or sell your information to third parties.

Data retention

We are committed to only keeping your personal data for as long as we need to in order to fulfil the relevant purpose(s) it was collected for, as set out above in this notice, and for as long as we are required or permitted to keep it by law.

We retain copies of our customer contracts in order to enable us to deal with any legal issues and the information provided to us for identification verification checks, financial crime and anti-money laundering checks (as required by law) for 5 years after termination or expiry of our contract with you. We retain details of complaints for 5 years from the date of receipt.

We shall keep records of the following for 5 years:

- call recordings, electronic communications and minutes of face-to-face meetings;
- suitability and appropriateness assessments;
- periodic statements (for example, valuations); and
- all orders and transactions in financial instruments on your behalf (including information about your identity).

CSL retain copies of all records aforementioned for a maximum of 7 years.

Transferring information overseas

We may share your personal information with our service providers and this may involve transferring it to countries outside the European Economic Area (EEA) whose data protection laws may not be as extensive as those which apply to us. Where we do so, we will ensure that we do this in accordance with the Acts and take appropriate measures to ensure that the level of protection which applies to your personal information processed in these countries is similar to that which applies within the EEA. Such measures may include only transferring your data to jurisdictions in respect of which there is a European Commission adequacy decision or, where this is not the case, by using model clauses which have been approved by the European Commission.

Your rights

You have a key right to learn and have access to what personal information is held by CSL and able to ask us for details on this. When we receive such a request, we will endeavour to provide you with these details without delay and at the latest within one month of receipt. We may extend the period of compliance by a further two months where requests are complex or numerous. In such instances CSL will inform you within one month of the receipt of the request and explain why the extension is necessary.

© CSL Capital (UK) Ltd 2020

When CSL receives a subject access request we will provide a copy of the information held free of charge. CSL may charge a reasonable fee to comply with requests for further copies of the same information. This does not mean that we will charge for all subsequent access requests rather that the CSL reserves the right to charge a fee based on the administrative cost of providing the information.

If the after reviewing a request the Data Protection Officer believes a request is manifestly unfounded or excessive, particularly if it is repetitive, then CSL may charge a 'reasonable fee' which will be decided on a case by case basis. In certain circumstances CSL may even refuse to respond to such requests.

You also have the following rights (unless exemptions apply), which can be exercised by contacting us using the details provided below.

The right:

- To ask us not to process your personal data for marketing purposes;
- To prevent any processing of personal data that is causing or is likely to cause unwarranted and substantial damage or distress to you or another individual;
- To request the rectification or completion of personal data which are inaccurate or incomplete;
- To restrict or object to the processing of your personal data (from 25th May 2018 onwards);
- To request its erasure under certain circumstances;
- In certain circumstances, to receive your personal data, which you have provided to us, in a structured, commonly-used and machine-readable format and the right to transmit that data to another data controller without hindrance, or to have that personal data transmitted to another data controller, where technically feasible (from 25th May 2018 onwards);
- To be informed about any use of your personal data to make automated decisions about you, and to obtain meaningful information about the logic involved, as well as the significance and the envisaged consequences of this processing; and
- To lodge a complaint about the way in which your personal data is being used to your Data Protection Authority: The Information Commissioner's Office (United Kingdom).

When you contact us to exercise any of the rights above, we may ask you to provide some additional information in order to verify your identity, such as your name, your address and proof of identity.

If you would like to lodge a complaint or exercise any of your rights set out above, you can contact us at:

Post: Data Protection Officer, CSL Capital (UK) Ltd , 11 Upper Grosvenor Street, London, W1K 2NB, UNITED KINGDOM

Alternatively, if you would like to contact your Data Protection Authority, please use the contact details below.

United Kingdom: Information Commissioner's Office

Where we rely on your consent to use your personal data, you have the right to withdraw that consent at any time.

© CSL Capital (UK) Ltd 2020