

Privacy Notice

Petrus Advisers Ltd. ("Petrus" / "the Firm") is a company registered in England with Company number 08288908. For the purposes of the General Data Protection Regulation ('GDPR'), Petrus will normally be the 'controller' of personal data that we have received.

At Petrus, we are committed to maintaining the trust and confidence of our visitors to our web site and subscribers to our monthly reports. Please read the following information on how we treat data that we collect from visitors to our website, or when someone subscribes to our monthly UCITS or SSF reports.

General Privacy Principles Petrus Advisers adheres to

- Petrus will process all personal data in a lawful, fair and transparent manner;
- Petrus will only collect personal data where it is necessary;
 - To provide a service to you and to the company you represent (hereinafter referred to as "you" as is appropriate to the context);
 - For you and the company that you represent to provide a service to the Firm;
 - For the Firm to keep you informed of its products and services; or
 - For the Firm to comply with its legal and regulatory obligations
- The personal data collected by Petrus will be adequate, relevant and limited to what is necessary in relation to the specific purpose for which your data will be held or processed
- Petrus will take all reasonable steps to ensure that personal data is accurate and, where necessary, kept up-to-date;
- Petrus will maintain personal data in a form that permits identification no longer than is necessary for the purposes for which the personal data has been collected for processing, in accordance with the Firm's record retention procedures;
- Petrus will hold and process personal data in a manner that ensures appropriate security;
- Petrus may share personal data with other entities within the Petrus Advisers group where necessary for the provision of services. Where such entities are outside of the EEA, personal data will be treated as is required under GDPR;
- Petrus will only share personal data outside of the Petrus Advisers group where it is necessary to provide the agreed service or where it is necessary for Petrus to comply with its legal requirements.

What personal data Petrus Advisers collects and why

The type of personal data (e.g. name, contact details, address etc.) that Petrus may collect will depend upon the relationship between Petrus Advisers and you. The data collected may be provided directly by you or, where appropriate, provided by third parties e.g. references, credit checks etc.

As a client, a contact, a service provider or employee (or prospective employee) of Petrus Advisers, the Firm will require some personal information in order to verify your identity and have the applicable relationship with you. Some of this information may be required to satisfy legal obligations (e.g. HMRC) whereas other information may be required in connection with the provision of services to you. The information collected will vary depending on the services Petrus provides to you or you provide to the Firm, but typically includes:

- Personal information: Such as your name, date of birth, passport number or national insurance number:
- Contact information: Including your address, telephone number and email address.



Petrus has comprehensive policies and procedures in place to ensure your personal data is kept safe and secure.

Personal data retention

Petrus Advisers will retain personal data for as long as is necessary for the purposes for which it was collected (or longer period if so required by law or legitimate interests), which will be at least for the period in which Petrus Advisers has a business interest with you.

Any information that is outside the scope of this requirement will be retained whilst relevant and useful, and destroyed where this ceases to be the case or where the data subject specifically requests this.

Data Subjects Categorisation in accordance with GDPR

The GDPR requires Petrus to inform you of the legal basis on which we maintain your personal data. As a general rule the following is applicable:

- Clients/Investors Information is maintained on the basis of contractual obligation and/or legitimate interests (where relevant);
- Service providers Information is maintained on the basis of contractual obligation;
- Database/marketing contacts Information is maintained on the basis of legitimate interest

Data Subjects Rights under GDPR

You have certain rights which apply in respect of your personal data, depending on your relationship with Petrus Advisers and its legal and regulatory obligations.

- You have the right to request a copy of the information that we hold about you. If you would like a copy of some, or all, of your personal information, please email Petrus Advisers (dataprotection@petrusadvisers.com)
- Petrus will provide this information to you within one month (with the ability to extend this by an additional two months where necessary), free of charge.
- You have the right to request that the information Petrus holds about you is erased under certain circumstances, including where there is no additional legal and/or regulatory requirement for Petrus to retain this information.
- You have the right to ensure that your personal information is accurate and up to date, or where necessary rectified. Where you feel that your personal data is incorrect or inaccurate and should therefore be updated, please contact Petrus Advisers (dataprotection@petrusadvisers.com).
- You have the right to object to your information being processed, for example for direct marketing purposes.
- If Petrus Advisers has relied upon 'consent' for the processing of personal data, then you have the right to withdraw such consent.
- You have the right to restrict the processing of your information, for example limiting the material that you receive or where your information is transferred.
- You have the right to lodge a complaint with the Information Commissioner's Office (https://ico.org.uk/concerns/) if you are not happy with the way that we manage or process personal data.



Visitors to our Website

When someone visits <u>www.petrusadvisers.com</u> we use cookies to collect standard internet log information. We will make it clear when we collect personal information and will explain what we intend to do with it.

Monthly Report/Newsletter Sign Up

As part of the registration process for our monthly UCITS and SSF-newsletter, we collect personal information. We use that information for a couple of reasons: to keep you updated about our funds as you have asked us to; to contact you if we need to obtain or provide additional information and to check that our records are right. We do not rent or trade email lists with other organisations and businesses.

We may use a third-party provider, MailChimp, to deliver our newsletter. This allows us to gather statistics around email opening and clicks using industry standard technologies to help us monitor and improve our newsletter. For more information, please see <u>MailChimp's privacy notice</u>.

You can unsubscribe to our newsletters at any time of the day or night by clicking the unsubscribe link at the bottom of any of our emails or email your request to **ir@petrusadvisers.com**.

Links to Other Web Sites

This privacy notice does not cover any links within our website linking to other websites. Those sites are not governed by this Privacy Policy, and if you have questions about how a site uses your information, you will need to check that site's privacy statement.

Changes to this Privacy Notice

We keep our privacy notice under regular review. This privacy notice was last updated on 24 May 2018.



Cookies Policy

We use a system of classifying the different types of cookies which we use on the Website. The classification was developed by the International Chamber of Commerce UK and explains more about which cookies we use, why we use them, and the functionality you will lose if you decide you don't want to have them on your device.

What is a cookie?

Cookies are text files containing small amounts of information which are downloaded to your personal computer, mobile or other device when you visit a website. Cookies are then sent back to the originating website on each subsequent visit, or to another website that recognises that cookie. Cookies are useful because they allow a website to recognise a user's device.

How long are cookies stored for?

Persistent cookies - these cookies remain on a user's device for the period of time specified in the cookie. They are activated each time that the user visits the website that created that particular cookie.

Session cookies - these cookies allow website operators to link the actions of a user during a browser session. A browser session starts when a user opens the browser window and finishes when they close the browser window. Session cookies are created temporarily. Once you close the browser, all session cookies are deleted.

Cookies do lots of different jobs, like letting you navigate between pages efficiently, remembering your preferences, and generally improve the user experience.

You can find more information about cookies at www.allaboutcookies.org and www.youronlinechoices.eu.

Cookies used on the Website

A list of all the cookies used on the website by category is set out below.

Strictly necessary cookies

On our website we use session cookies. These cookies register whether the user has already visited our website before. These cookies are essential in order to enable you to move around the website and use its features, such as accessing secure areas of the website.

Contact

For any queries and questions, concern or complaints contained within this document, please email us at dataprotection@petrusadvisers.com.