

Goodhart Partners Privacy Notice

Effective date: 1st November 2024

With effect from 25 May 2018, the EU General Data Protection Regulation (Regulation (EU) 2016/679) (together with applicable implementing laws, ("EU GDPR") will apply, and/or the EU GDPR as it forms part of the laws of the United Kingdom by virtue of section 3 of the European Union (Withdrawal) Act 2018 and as amended by the Data Protection, Privacy and Electronic Communications (Amendments etc.) (EU Exit) Regulations 2019 (the "UK GDPR", and, together with the EU GDPR, the "GDPR") applies, to the extent relevant to the processing of personal data by Goodhart Partners LLP ("Goodhart"), also referred to in this Privacy Policy as "we" or "us", in the course of their businesses, and certain other persons. This notice sets out information relating to those activities.

This Privacy Notice is for individuals connected with, or employed by, institutional investors, financial intermediaries and consultants, and other professional third parties, such as custodians and service providers, with whom Goodhart Partners has a business relationship. We refer to such individuals in this Privacy Notice as our "Business Contacts".

This website is operated by Goodhart Partners LLP ("Goodhart") of Queensland House, 393 Strand, London WC2R 0LT, also referred to in this Privacy Notice as "we" or "us". Goodhart is committed to protecting and respecting your privacy. This Privacy Notice describes how we will collect and use your information both from your use of this website and through any services that we may provide to you and the rights you have in relation to your information.

We may collect information from you about your preferences through your use of this website, when you request information from us or engage with our services.

By using any of our services, including this website, and by providing us with any personal information, you are consenting to the use of your personal information as set out in this Privacy Notice. Please do not send us any personal information if you do not want that information to be used in this way.

References in this Privacy Notice to "your information" are also to personal information that you provide to us. Goodhart is the data controller of any information provided via this website and via our relationship with you.

This Privacy Notice describes how we collect and use personal information about you during and after your relationship with us, in accordance with the GDPR. It applies to the processing of personal data of our Business Contacts.

The kind of information we hold about you

Goodhart may ask for and collect from you personally identifiable and other information at certain points via this website and via your relationship and interactions with us. Depending on the information and/or services you request, you may be asked to provide your name, email address and other information including identification documents.

In addition to the information you knowingly provide, Goodhart collects the domain names and IP addresses of its website visitors, along with usage statistics (e.g., types of web browsers and operating systems used) and browsing history. This data is used to promote our services. Goodhart may combine this information with the personally identifiable and other information it collects.

We ask that you do not disclose any such information to us if you are uncomfortable with it being stored on our systems to comply with our regulatory obligations.

How is your personal information collected?

We typically collect personal information about our Business Contacts directly from them, from their employers or from other Business Contacts with whom we share a relationship. For example, our institutional clients will share with us the contact details for their advisers and service providers. We will collect additional personal information in the course of our relationship as a necessary consequence of the services being provided.

How we will use information about you

We will only use your personal information when the law allows us to; this is known as a “legal basis” for processing.

Situations in which we will use your personal information

We may use your personal information to:

- communicate with Business Contacts in relation to, or to facilitate the provision of, our services; the legal basis for this will be for performing a contract we have entered with you personally, or in furtherance of your and our legitimate interests;
- communicate with Business Contacts to provide you with information about Goodhart and relevant events or research organised or produced by us, unless you have indicated to us that you do not wish to receive such information;
- process identification details of certain Business Contacts in order to confirm their identities, which is an anti-fraud measure to comply with our legal obligations;
- check identification details of Business Contacts against databases of individuals who are subject to sanctions, classified as “politically exposed persons”, or have committed crimes and to follow up any suspicions, in order to ensure that we comply with our anti-money laundering and terrorism obligations and to avoid fraud itself; and
- meet our other compliance and regulatory duties, for example to retain certain records.

We may also use your personal information in the following situations, which are likely to be rare: where we need to protect your interests (or someone else's interests, such as a corporate client we have in common); or where it is needed in the public interest or for official purposes.

There may be overlap in the circumstances in which we use the same information about you.

Change of purpose

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law or regulation.

Data Sharing

In order to achieve said purposes, your personal information may be communicated to authorised persons within Goodhart for example with respect to marketing, business development, client servicing, information technology, legal and compliance.

Please note that we may on occasion be required to share your information with other Goodhart group companies or branches around the world and other third parties who provide services to us or on our behalf. This may entail a transfer of your information from a location within the United Kingdom ("UK") European Economic Area (the "EEA") to outside the UK or EEA, or from outside the UK or EEA to a location within the UK or EEA. The level of information protection in countries outside the UK or EEA may be less than that offered within the UK or EEA. However, we have procedures in place to ensure the protection of your information and we have taken steps to ensure that all such entities keep your personal information confidential and secure and only use it for the purposes that we have specified and have informed you of.

Goodhart may disclose your personal information to another entity (i) for purposes of outsourcing one or more of the functions described above; (ii) to confirm or update information provided by you; (iii) to inform you of events, information about our services, and other important information; or (iv) for other purposes disclosed at or before the time the information is collected. We may also share your information when legally required to do so.

Data Security

We have put in place measures to protect the security of your information. Details of these measures are included in group-wide policies which cover the following:

- management and organisation of information security;
- classification of data which includes data handling rules;
- staff training on responsibilities connected to information security and the reporting of any information security incidents;
- physical and environmental security; and
- systems security, including backups, virus protection and access controls.

Data Retention

How long will you use my information for?

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal or regulatory requirements.

You will appreciate that as a regulated business, there are record retention obligations on us. We retain your personal data in order to comply with these obligations.

Rights of access, correction, erasure, and restriction

Your rights in connection with personal information

Under certain circumstances, by law you have the right to:

- Request access to your personal information. This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- Request erasure of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to stop processing personal information where we are relying on a legitimate interest and there is something about your particular situation which makes you want to object to processing on this ground.

- Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- Request the transfer of your personal information to another party.

You can exercise these rights by contacting your usual Goodhart relationship contact.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights).

Right to Withdraw Consent

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact your usual Goodhart relationship contact. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

Email marketing list and marketing messages

We operate an email mailing list program, used to inform you about products, services and/or news we supply or publish. You can change your preferences for receiving group marketing emails, news/updates and other information from us at any time. You can unsubscribe at any time through an automated online service or, if this is not available, by contacting us.

Email marketing messages may contain tracking beacons / tracked clickable links or similar server technologies in order to track subscriber activity. Where used, such marketing messages may record a range of subscriber data relating to engagement, geographic, demographics and already stored subscriber data.

Please note that we may use your marketing and content preferences, and other information you provide to us in order to build a profile for you. We may supplement this profile with information about how you use our websites, review our content and interact with us. We use this profile to try and ensure that you only receive information that you are likely to find of interest.

If you do not want to receive information from us

If you receive marketing materials from us, you may withdraw your consent for us to send these to you at any time and free of charge.

Cookies

We use cookies (small files that remember a user's electronic device) to help improve this website, and improve our services to you, in a variety of different ways. For further details, see our Cookie Policy.

Data Protection Officer

We have appointed our Data Protection to oversee compliance with this Privacy Notice. If you have any questions about this Privacy Notice or how we handle your personal information, or if you are

unhappy with how we handle your personal information, please contact the Data Protection Officer Natalie Konschu at nkonschu@goodhartpartners.com or your usual Goodhart relationship contact. If we do not resolve your concerns to your satisfaction, you 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.

Changes to this Privacy Notice

We may update this Privacy Notice from time to time, and will communicate such updates through our website, www.goodhartpartners.com. We will not do so where we believe this would materially impact your rights and freedoms: in those circumstances we will expressly notify you. We may also notify you in other ways from time to time about the processing of your personal information.

If you have any questions about this Privacy Notice, please contact your usual Goodhart relationship contact, who will be happy to assist you.