

Privacy Notice

This policy sets out how Temple Bar Investment Trust plc ('Temple Bar', 'we/'us/'our') of Woolgate Exchange, 25 Basinghall Street, London EC2V 5HA uses and protects any information that you give us when you use this website (the 'Website'). We regard the privacy of our users as very important and any personal information which you provide to us will be dealt with in accordance with this Privacy and Cookies Policy. If you have any questions about this policy, please contact us by e-mail at martin.slade@investecmail.com before using this Website.

In this Privacy and Cookies Policy we explain how and why we collect or otherwise process your personal information, what our lawful reasons are for this under data protection laws, what we do with it, what your rights are and what controls you have over our use of it.

We may change this Privacy and Cookies Policy from time to time by updating this page. You should revisit this page from time to time to re-read this Privacy and Cookies Policy to keep yourself apprised of any changes. This Privacy and Cookies Policy is effective from May 2018.

Other privacy policies and terms may apply where you access other services and other websites through the Website. You should read any other applicable privacy policies and terms carefully before accessing and using such other services.

What personal information do we collect?

In general, you can use this Website without giving us any personal information. However, we may gather certain information such as records of your activity on the Website and in this way process your personal information. For instance, if you sign up to receive our updates by email, or if you contact us, we will process your personal information because you will identify yourself when you do this.

We may collect and use the following information:

- Your name and contact information (including e-mail address) and any other contact details you provide to us when you complete the Contact Form on the website;
- The reason for your contact, for example, an enquiry or to provide a comment;
- Information you provide if you report a problem with our Website;
- Records of any correspondence when you contact us;
- Anonymous details of your visits to the Website including, but not limited to, traffic data, location data and communication data and the resources that you access;
- Details such as your mobile phone location data, IP address and MAC address; and
- Information about how you use this website collected through cookies (see 'Cookies' below).

Sources of this personal information

We will collect your personal information from you directly via this website.

What are 'special categories of personal data'?

This is a more sensitive category of personal information which relates to a person's racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning (mental or physical) health or data concerning a natural person's sex life or sexual orientation.

Please do not provide this type of data to us when you contact us or use our website. The same points apply to criminal convictions and offences data

What do we do with the personal information we collect and what are the legal grounds for our processing of your personal information (including when we share it with others) for these purposes?

Data protection laws require us to explain what legal grounds justify our processing of your personal information (this includes sharing it with other organisations). For some processing more than one legal ground may be relevant (except where we rely on a consent). Here are the legal grounds that are relevant to the purposes for which we process personal information.

01. Processing necessary for **the contract we have with you** including to check and enforce compliance with the terms of use on this website.
02. Processing necessary **for the following legitimate interests** which apply to us and in some cases other organisations (who we list below) and where we have balanced these against your own interests in accordance with data protection laws:
 - a. To correspond with you by email, or by telephone, in response to your questions and queries raised through our Website;
 - b. To deal with and respond to any communication, enquiry or application which you submit to us through our Website;
 - c. To test the performance of our internal processes;
 - d. To provide you with a better service when you use our Website and to improve and personalise your experience when you visit the Website;
 - e. To check and enforce compliance with the terms of use on this Website;
 - f. To use your personal information to improve our services;
 - g. To adhere to guidance and best practice issued by the Information Commissioner's Office
 - h. For the operation, administration, development and enhancement of the Website and to ensure that the content of the Website is presented in the most effective manner for you and for your computer;
 - i. To advertise certain products which we think you might be interested in when you visit the Website;
 - j. To contact you regarding any specific request or enquiry you make;
 - k. For management and audit of our business operations including accounting;
 - l. To administer our good governance requirements, such as internal reporting and compliance obligations;
 - m. For internal record keeping;
 - n. For market research and analysis and developing statistics relating to how our Website is used;
 - o. If you provide us with your information via our website, use the information to customize the website according to your interests, including through cookies (see 'Cookies' below);
 - p. When we share your personal information with these other people or organisations;
 - Our legal and other professional advisers and our auditors;
 - Governmental and regulatory bodies such as HMRC (as relevant) and the Information Commissioner's Office;

- Other organisations and businesses who provide services to us, such as back up and server hosting providers, IT software and maintenance providers, document storage providers and suppliers of other back office functions; this may include service providers and subcontractors retained to perform functions on our behalf or to provide services to us, such as marketing and advertising; software development; website hosting and management; information technology and office services; legal, accounting, audit and other professional service providers; and other services related to our business. Such information being provided to such service providers and subcontractors on the basis that they do not collect, use or disclose the personal information for any purpose other than to perform such functions on our behalf or to provide services to us or as otherwise required by law;
- Any agent or contractor acting on our behalf (such as service providers managing communications to our Website users);
- Buyers and their professional representatives as part of any restructuring or sale of our business or assets; and
- Market research organisations who help us to develop and improve our services.

03. Processing necessary **to comply with our legal obligations:**

- For compliance with laws and regulations that apply to us;
- For establishment, defence and enforcement of our legal rights;
- For activities relating to the prevention, detection and investigation of crime;
- To deal with requests from you to exercise your rights under data protection laws;
- To process information about a crime or offence and proceedings related to that (in practice this will be relevant if we know or suspect fraud); and
- When we share your personal information with these other people or organisations:
 - Law enforcement agencies and governmental and regulatory bodies such as HMRC (as relevant) and the Information Commissioner's Office;
 - Courts and other organisations where that is necessary for the administration of justice, to protect vital interests and to protect the security or integrity of our business operations; and
 - When Temple Bar believes that disclosure is appropriate in connection with efforts to investigate, prevent, or take action regarding illegal activity, suspected fraud, or other wrongdoing; to protect and defend the rights, property or safety of Temple Bar, its customers, staff, suppliers or others; to comply with applicable law or co-operate with law enforcement; or to enforce its terms or other agreements.

04. Processing with your consent:

- When you request that we share your personal information with someone else and consent to that; and
- To send you the updates and other direct marketing communications by email which you have opted in to receive (see 'Direct Marketing' below).

How and when can you withdraw your consent?

Much of what we do with your personal information is based on other legal grounds. For processing that is based on your consent, you have the right to withdraw that consent at any time. You can do this by contacting us (see below). The consequence is that we cannot send you our updates or other marketing communications unless you re-subscribe.

Will your personal information be transferred outside the UK or the European Economic Area?

Personal Information may be transferred to other locations outside the UK and the EEA, for example to organisations and businesses who provide services to us. When your personal information is processed inside the UK and the EEA it is protected by data protection laws. Some other countries and territories do not have adequate protection for personal information by law. For example, the United States. We will make sure that suitable safeguards are in place before we transfer your personal information to those countries and territories.

Safeguards can include: (i) the Standard Data Protection Clauses (also known as EU Model Clauses); (ii) the US Privacy Shield; and (iii) Binding Corporate Rules provided the recipients in other countries have obtained the requisite approvals and the published list of approvals. For more information about suitable safeguards and (as relevant) how to obtain a copy of them or to find out where they have been made available you can contact us (see below).

Our updates and direct marketing

If you consent by opting in, we will use your personal information in order to send you updates and other direct marketing by email about our services. You can choose to restrict the collection or use of your personal information for direct marketing purposes, as follows:

In each direct marketing communication we send by email (including updates by email) we will remind you of how you can prevent further electronic direct marketing. You may do this by using the link provided in the marketing email to send an 'UNSUBSCRIBE' request.

In addition, you can change your mind at any time by writing to us or sending an email to us (details below).

Retention of your personal information

Unless we explain otherwise to you, we will generally hold your personal information in accordance with the following criteria:

- **Retention in case of queries.** We will retain the personal information that we need to keep in case of queries from you;
- **Retention in case of claims.** We will retain the personal information that we need to keep for the period in which you might legally bring claims against us;
- **Retention in accordance with legal and regulatory requirements.** We will retain the personal information that we need to satisfy our legal and regulatory requirements; and
- **If you unsubscribe from our updates we will not retain your personal data (ie your contact details) for that purpose. Instead, we will process your unsubscribe request and suppress or delete your contact detail from our marketing database(s) within a reasonable time period in accordance with the regulator's guidance.**

Here is how we apply the retention criteria above. If you become an investor (distinct from someone who simply signs up for updates or raises an enquiry through the 'contact us' function on our website) we generally keep your personal data for up to 10 years after the contract you have with us has terminated/expired. This is in accordance with the criteria set out in the first, second and third bullets. This 10 year retention period does not apply to the fourth bullet.

What are your rights under data protection laws?

Here is a list of the rights that all individuals have under data protection laws. They do not apply in all circumstances. If you wish to exercise any of them we will explain at that time if they are engaged or not.

- The **right to be informed** about your processing of your personal information;
- The right to have your personal information **corrected if it is inaccurate** and to have **incomplete personal information completed**;
- The right **to object** to processing of your personal information;
- The right **to restrict processing** of your personal information;
- The right **to have your personal information erased** (the 'right to be forgotten');
- The right to **request access** to your personal information and to obtain information about how we process it; and
- The right to **move, copy or transfer your personal information** ('data portability').

You have the right to complain to the Information Commissioner's Office which enforces data protection laws: <https://ico.org.uk/>

Should you wish to exercise any rights under data protection laws, please contact us at martin.slade@investecmail.com or write to us at Temple Bar Investment Trust plc, Woolgate Exchange, 25 Basinghall Street, London, EC2V 5HA. We are required by data protection laws to deal with your rights request within 30 calendar days.

If you believe that any information we have about you is incorrect or incomplete, please write to or e-mail us as soon as possible. We will correct or update any information as soon as possible.

Data anonymization and aggregating your personal information

Your personal information may be converted into statistical or aggregated data which cannot be used to re-identify you. It may then be used to produce statistical research and reports. This aggregated data may be shared and used in all the ways described in this privacy notice.

Security and storage

Once any personal information comes into our possession, we will take appropriate steps to protect that information from misuse and loss and from unauthorised access, modification or disclosure as appropriate to the nature of the information and the harm that might result from a breach of security.

Unfortunately, we cannot guarantee the security of any transmission of personal information over the Internet. Communications over the internet such as e-mails are not secure unless they have been encrypted. So while we strive to protect such information, we cannot ensure or warrant the security of any information transmitted to us. You therefore accept the inherent security implications of dealing online and will not hold us responsible for any breach of security unless such breach has been caused by the specific negligence of Temple Bar, its affiliates or its agents.

If you would like further information about our data retention practices you can contact us (details overleaf).

Cookies

The cookie settings on this website are set to 'allow all cookies' to give you the best user experience. When you visit this website a cookie will be transferred to your computer's hard drive through your browser. The cookie will expire after 30 days or sooner should there be a change to this important information.

We use the following cookies:

- **Strictly necessary cookies.** These are cookies that are required for the operation of our website. They include, for example, cookies that enable you to log into secure areas of our website.
- **Analytical/performance cookies.** They allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily.
- **Functionality cookies.** These are used to recognise you when you return to our website. This enables us to personalise our content for you, greet you by name and remember your preferences (for example, your choice of language or region).
- **Targeting cookies.** These cookies record your visit to our website, the pages you have visited and the links you have followed. We will use this information to make our website and the advertising displayed on it more relevant to your interests. We may also share this information with third parties for this purpose.

If you do not wish to accept cookies, you are free to block cookies on your browser. However, please note that if you do block cookies, it will impact your ability to navigate this website effectively. By continuing to browse this site, you are agreeing to use our cookies.

COOKIE	PURPOSE	NAME
Cookie	Cookie	The website stores a cookie confirming the acceptance of the website cookie policy.
Consent	Confirmation	Cookies stored: _cookieConsent
Google	Analytics	Provides data anonymously on the visits made to our website. Cookies stored: _ga, _gat_[ID], _gid
Pardot	Analytics	Measures traffic and visitor behaviour on an individual level to help us improve our website and the email communications we send out.
Qumu	Video hosting	Qumu hosts videos that appear on our websites. The cookie allows for more efficient playback of videos. Cookies stored under the domain kuluvalley.com. Cookies stored: JSESSIONID, KV_CLIENT_SESSION_ID