

# Privacy Policy

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## Introduction

Your privacy is important to Castellain Capital LLP (“**Castellain**”, “**we**”, “**our**” or “**us**”). This Privacy Policy sets out our policies regarding the types of personal information we collect from you and how we use it.

## Information we collect

We may collect various personal data from you depending on the relationship between you and us. This data may include names, residential addresses and other contact details, national identification documents and employment and financial information. Where you are making an investment in one of our funds, this information will be passed on to the fund administrator (the “**Administrator**”) which will act as a data processor.

We may collect personal data about you through information that you provide directly to us such as on one of our subscription forms, or through meetings or other communications such as on our website. We also use cookies on our website to track visits and provide personalised services.

## Why we collect information about you

We may collect information about you for the purposes of:

- Enabling you to make an investment in one of our funds and fulfilling our legal, contractual and regulatory obligations in relation to any such investment including the carrying out of anti-money laundering checks and the reporting of tax-related information;
- Monitoring and recording electronic communications pursuant to our regulatory obligations;
- Disclosing information to other third parties such as the Administrator, auditors and regulatory authorities;
- Providing you with information regarding the funds we manage and related direct marketing purposes;
- Providing website account services;
- For recruitment purposes.

We will use one of the permitted grounds to process your information. These grounds include:

- Consent – where you have indicated your consent to us processing your information;
- Performance of a contract;
- Compliance with a legal obligation;
- Pursuing the legitimate interests of Castellain, such as those identified above.

Where we process your personal data for our legitimate interests, we will consider any potential impact on you and your rights. Whenever we process personal data for these purposes you have the right to object to this way of processing.

### **Disclosure of your information**

We may share your personal data with third parties where necessary and relevant to the purpose for which we collect your information. Such third parties may include: our Administrator, our service providers including IT, telecoms and other service providers, our auditors and our regulator.

### **Transfers abroad**

From time to time, the disclosure of personal information to the third parties set out above may involve the transfer of data to jurisdictions outside the European Economic Area ("EEA") in accordance with the requirements of the GDPR. Such countries may not have the same data protection laws as your jurisdiction. In these circumstances, we take steps to ensure that the recipient agrees to treat your personal information in accordance with the requirements of the GDPR.

### **Retention period**

We will retain your personal information for as long as required for the purpose for which it was collected. If there are additional legal or regulatory obligations which require us to retain the information for a longer period then we will do so.

### **Failure to provide personal data**

The provision by you of personal data is required for us to comply with the legal, regulatory and tax requirements referenced above. Where you fail to provide such personal data we may be required to discontinue our business relationship with you.

### **Your data protection rights**

You have the right to:

- Access the personal data we hold about you at no charge;
- Amend and rectify your personal data;
- Lodge a complaint with a supervisory authority if you consider that the processing of personal data relating to you infringes the GDPR;
- Request that your personal data is erased;
- Withdraw consent to process your data.

### **Contact details**

The data controller is Castellain Capital LLP of 34 New Cavendish Street, London, W1G 8UB.

If you have questions about this Privacy Policy or requests with regards to the personal data we hold about you, please contact the Compliance Officer by email at [compliance@cascap.co.uk](mailto:compliance@cascap.co.uk) or at the address above.