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Data Protection Notice

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Purpose: Contract fulfillment and legal obligations

Lawful basis: Contract/Legal Obligation/Legitimate Interests

Hanson Asset Management Limited (“**HAM**”, “us”, “we” or “the Firm”), as a Data Controller, have an obligation under the General Data Protection Regulation (GDPR) to inform individual Data Subjects of their rights in relation to data held about them.

(i) What information is being collected

For the purposes mentioned in the following paragraph “Why it is being collected” we collect the following categories of personal data:

- name, date of birth, address and contact details;
- nationality and national identity number(s);
- identification documentation;
- tax status and tax identification number;
- employment details, income and personal wealth; and
- bank account details and/or account balance information.

(ii) Why it is being collected

All the data you provide to us will be processed subject to the restrictions and for the purposes pointed out in this notice, namely:

- a. For the performance of the contract and the complete fulfilment of any contractual obligation we have with you and/or your Company (legal basis for processing as per lawfulness condition is a contract as stated at art. 6 (b) of the General Data Protection Regulation 2016/679)
- b. For complying with obligations provided by laws, current regulations and European legislation (e.g. tax regulations) (legal basis for processing as per lawfulness condition is legal obligation as stated at art. 6 (c) of the General Data Protection Regulation 2016/679)
- c. For legitimate business purposes to advise you through e-mail, phone call or by post in the framework of ordinary commercial relationship, about other products or services similar to the subject matter of this contract and that we think will be of interest to you. (legal basis for processing as per lawfulness condition is our legitimate interests as stated at art. 6 (F) of the General Data Protection Regulation 2016/679).

Whenever we process your Personal Data for a Legitimate Interest we will ensure always to take account of your rights and to balance our interests with them. You can obtain evidence of the Legitimate Interests Assessment we conducted to determine if we can rely on Legitimate Interests for processing your Personal Data. You have the right to object to this processing if you wish. Please bear in mind that if you object this will affect our ability to provide any mentioned advice and services for your benefit.

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The provision of data is discretionary however a lack of data can be an impediment to the exchange of information necessary for the execution of the contract. You (natural persons to which the data refers) have the right to determine how we use your data and to oppose to the purposes of processing at any time.

(iii) Who is collecting data

Data will be collected by HAM (the “Data Controller”), with business address **6 Arlington Street, London SW1A 1RE** and main telephone number **+44 207 529 3737**.

The Data Protection Officer of our Firm who can be contacted by the following methods:

- a. Email: dpo@hansonam.com
- b. Telephone: +44 207 529 3737
- c. Post: 6 Arlington Street, London SW1A 1RE

(iv) How data is processed

Personal data is processed both manually and electronically in accordance with the above-mentioned purposes and, in any case, in order to guarantee data security and data confidentiality in compliance with current regulations. Our Employees and other Third Party processors contracted with us such as our custodians can access your data. Our Employees and Third Party processors are appropriately designated and trained to process data only according to the instructions we provide them. All the data will be processed for the duration of this contract and subsequently for the fulfillment of legal obligations. For Data Retention periods refer to (v).

(v) How data is stored and with whom it could be shared

Data is recorded on paper and IT systems. Basic personal data listed in (i) will be stored on our CRM system, files or IT servers which is accessible to authorized personnel for the above-mentioned purposes.

We may disclose your Personal Data to authorised service providers who perform services for us (including background checks and KYC, cloud services, data storage, payment processing, customer support and bill collection). Our contracts with our service providers include commitments that they agree to limit their use of Personal Data to our specific instructions and to comply with privacy and security standards.

Without prejudice to any communications made to comply with legal or contractual obligations, data may also be disclosed to external parties as required by laws or regulations (e.g. court, tribunal, Regulatory Authority or Governmental Entity).

When we share your information with other entities within our group or contracted Third Party companies we take all reasonable steps to ensure that your information and privacy are protected in line with the applicable legal obligations.

Data will be stored for a period of 5 years from the completion of the project or the end of the

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commercial relationship.

(vi) Your rights and how to exercise them

We remind you that you have the right to request from us access to and rectification or erasure of personal data, or a restriction of processing, or to object to processing of data concerning you.

You also have the right to receive your personal data that you provided to us in a structured, commonly used and machine-readable format and have the right to transmit such data to another controller without hindrance from us. In exercising your right to data portability, you have the right to have your personal data transmitted directly from a controller to another, where technically feasible.

You can contact us to exercise your rights with the contact details indicated above in (iii) or by going to the website www.hansonam.com where you can download and complete a *Data Subject Request Form* appropriate to your specific request.

We also provide a *Complaint Form* accessible on our website should you wish to make a complaint to us about how we process your Personal Data. If such a complaint is received we will take all appropriate steps to rectify the issue.

If you consider that the processing of your personal data infringes applicable data protection laws, as data subject you have the right, without prejudice to any other administrative or judicial remedy, to lodge a complaint with a supervisory authority, in particular, in the Member State of your habitual residence, place of work or place of the alleged infringement.

The Supervisory Authority for the Member State we are located in is the Information Commissioners Office (ICO) who can be contacted via their hotline 0303 123 1113 or through the Concerns section of their website, <https://ico.org.uk/concerns/>.