

Privacy Policy of MackayWilliams LLP (incorporating MWB Ventures Limited, Fund Buyer Focus Limited and Fund Radar Limited). Updated 24 May 2018

MackayWilliams LLP, which incorporates MWB Ventures Limited, Fund Buyer Focus Limited and Fund Radar Limited ("We") are committed to protecting and respecting your privacy.

This policy sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us.

The General Data Protection Regulation ((EU) 2016/679) (GDPR) (effective 25th May 2018) gives data subjects (living individuals in respect of whom personal data is processed) enhanced rights and protections in relation to their personal data. We are committed to safeguarding the privacy of the users of our services. Therefore, we have updated our Privacy Policy so we are completely clear as to what personal data we collect, why we collect that personal data and how we handle it. When we collect personal information relating to the supply of services to our customers MackayWilliams LLP whose registered office is at 1-2 City Business Centre, Hyde Street, Winchester, Hampshire, SO23 7TA and whose main place of business is at Unit 6, St Saviours Wharf, 25 Mill Street, London, SE1 2BE, are the Data Controller (as that term is defined in data protection legislation). When we collect data relating to the market research services we carry out through Fund Buyer Focus Limited, then Fund Buyer Focus Limited will be the Data Controller. Fund Buyer Focus Limited's registered office is at 1-2 City Business Centre, Hyde Street, Winchester, Hampshire, SO23 7TA and its main place of business is at Unit 6, St Saviours Wharf, 25 Mill Street, London, SE1 2BE.

Please read this privacy policy carefully. By visiting our websites www.mackaywilliams.com, www.fundbuyerfocus.com and www.fund-radar.com you are accepting and consenting to the practices described in this policy.

1. What information do we collect from you?

We may process the following data about you:

1.1. Information you give us.

What personal data might you supply to us?	How and why we process your personal data:
Client information: Information about you which relates to your, or your employer's account with us. This information may include your name, your email address and your telephone and/or mobile number.	We will process this data to maintain your account with us, to provide our services to you, to communicate with you and to back up our database. The reason we process this data is to ensure the proper administration of your account and our business (our legitimate interest) and, where you have entered into a contract with us, for the purposes of fulfilling our contract with you.
Registration Information: Information you provide when you register to receive our newsletter and/or any other free content we make available on our website, and information you provide when you report a problem with our site. The information you give us may include your name, e-mail address and phone number.	We will process this data so we can deal with your registration, or other communications or applications, or to address your query or concern. The reason we process this data is to ensure the proper administration of your registration and our business.

<p>Prospect Data: If you enquire about our services, you will provide certain information to us so that we can respond to your enquiry. The information you supply to us may include your name, your contact details, and other information relevant to your transaction.</p>	<p>We will process that data in order to deal with your enquiry (our legitimate interest) and by making an enquiry you are consenting to us contacting you.</p>
<p>Communication Data: If you communicate with us, we may process the information contained in your communication. This information may include your name and contact information, the content of your communication and any metadata our website generates where you communicate with us using the contact form available on our website.</p>	<p>We will process that information so we can correspond with you and keep records of such correspondence. The reason we are processing this data is to ensure the proper administration of our business (our legitimate interest).</p>
<p>Notification Data: Where you have purchased services from us, or where you subscribe to receive marketing communications, newsletters and our email notifications, we will process your data so that we can send such email notifications and/or newsletters to you.</p>	<p>The legal basis for us processing this data is that you have consented to such processing</p>
<p>Regulatory Data: We may process your data if we need to do so in order to comply with our legal and/or regulatory obligations, so that we can protect the vital interests of you or another natural person.</p>	<p>The reason we will process such data is to protect the vital interests of you or another natural person.</p>
<p>Research Data: One of the services we offer, which is provided by Fund Buyer Focus Limited, is market research services. To this extent we may process publicly available personal information in order to provide such services.</p>	<p>The reason we process such data is to ensure we can properly administer and operate our business (our legitimate interest).</p>

1.2. Information we collect about you.

In order to pursue our legitimate interests as a market research firm, we may gather and hold data on fund selectors that has been made publically available. This information is limited to the following: name, company, email address, telephone number, language & country. In addition, we will hold a record of any previous contact with individuals we interview for market research purposes.

When an interview is carried out we will keep a transcription of the recording for internal reference, but the original recording will be destroyed, after three months at the latest. Each interview will be anonymised before being made available to our research teams. We do not share any personal information gathered during interviews with our clients or any other third parties.

With regard to each of your visits to our website we will automatically collect the following information:

- (a) technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform. We will obtain this data through [our analytics tracking system]. We process this data so we can monitor and analyse how our website is used so we can improve our website and our services.;
- (b) information about your visit, including the full Uniform Resource Locators (URL), clickstream to, through and from our website (including date and time), products you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), methods used to browse away from the page. We

process this data so we can monitor and analyse how our website is used so we can improve our website and our services

1.3. Information we receive from other sources.

This is information we receive about you if you use any of the other websites we operate or the other services we provide. We operate several websites (www.mackaywilliams.com, www.fundbuyerfocus.com and www.fund-radar.com). Personal data may be shared between our group of companies so that we can properly operate our business. We will only grant access to personal information to those of our employees, agents and contractors who need to have access to that information to properly carry out their role in our business. All personal information will be subject to strict security and access controls. We are working closely with third parties (including, for example, business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers, credit reference agencies). We may receive personal data about you from these organisations. Those organisations will have their own privacy policies detailing how they process personal data.

2. Cookies

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site.

3. When will we disclose your personal data to others?

3.1. We may need to share your personal information with members of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries. These terms are defined in section 1159 of the UK Companies Act 2006. We will only share such personal information where this is necessary for the purposes set out in this policy. The companies in our group are as follows: MackayWilliams LLP (LLP registration number OC352484) which is the parent company; MWB Ventures Limited (registration number 09632536), Fund Buyer Focus Limited (registration number 07450289) and Fund Radar Limited (registration number 07774178) which are all subsidiaries of MackayWilliams LLP.

3.2. We may need to share your personal information with certain selected third parties including:

- (a) our business partners, suppliers and sub-contractors for the purpose of performing any contract we have with you or them. In particular, we use third party companies to process your personal data in order to provide IT support services to us; and
- (b) analytics and search engine providers that assist us in the improvement and optimisation of our website.

3.3 We will also disclose your personal information to third parties in the following circumstances:

- (a) If we sell or buy any business or assets, in which case we may need to disclose certain personal data to the prospective seller or buyer of such business or assets.
- (b) If all or most of our assets are acquired by a third party, in which case personal data held by us about our customers will be one of the transferred assets.
- (c) If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce any legal agreement we have with you; or to protect our rights or property, or the safety of us, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

4. Where do we store your personal data?

We will always try to ensure that your personal data is processed within the European Economic Area. In some circumstances this will not be possible. In circumstances where it is necessary for us to transfer your personal data outside the European Economic Area, we will only transfer such personal data to third parties where we have carried out due diligence on such third parties to ensure they will protect your personal data using similar standards and safeguards as we have. We will also

have contractual provisions in place with such third parties to ensure your personal data is protected. Such contractual provisions will be based on the standard contractual clauses approved by the European Commission for the transfer of data outside the EEA or such other appropriate standards as are required from time to time by the European Commission or the UK Government. You consent to the transfer of your personal data outside of the EEA, as long as we comply with these requirements.

All information you provide to us is stored on our secure servers. Any payment transactions will be encrypted using SSL technology. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, and we will maintain appropriate technical and organisation measures to protect your personal data, we cannot guarantee the security of your data transmitted to our website; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

5. Storage and deletion of personal data

- (a) We will only retain your personal information for as long as necessary to fulfil the purposes for which we collected it which will include satisfying any legal, accounting, or reporting requirements. Any personal data that we process will be deleted from our systems once we have completed the purpose for which we were processing the personal data. In some cases, the purpose for which we are processing your personal data will last for a considerable period (for example, if you are a long term customer of ours, we will need to store your data until our relationship with you comes to an end).
- (b) To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements. We will take into consideration a number of factors such as your relationship with us, your engagement with us, and the fulfilment of contracts we have with you.
- (c) We may need to retain your personal data where this is necessary to comply with our legal or regulatory obligations, or to protect the vital interest or the vital interests of another natural person.

6. Data security

We have appropriate security measures in place to prevent personal information from being accidentally lost or from being used or accessed in an unauthorised way. We limit access to your personal information to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

7. Your rights

7.1 Under data protection laws you have the following fundamental rights:

- (a) The right to access the personal data we hold about you;
- (b) The right to have your personal data corrected if there are errors or inaccuracies in it, or your personal data is incomplete;
- (c) The right to restrict the processing we carry out in relation to your personal data;
- (d) The right to object to the processing we carry out in relation to your personal data;
- (e) The right to have the personal data we hold about you provided to you in a useable format;
- (f) The right to complain to a supervisory authority (in the UK this is the Information Commissioner's Office) about how and/or why we are processing your personal data;

(g) The right to tell us you no longer consent to us processing your personal data. In practice you will usually agree in advance to us using your personal data for marketing purposes and if you no longer wish us to use your personal data for marketing purposes, you can opt out of receiving such marketing messages at any time. You can do this either by unsubscribing from the marketing messages we send you, notifying us in writing at privacy@mackaywilliams.com.

7.2 You can ask us to provide you with details of any personal data we hold about you. You do not have to pay us a fee to access your personal data unless we believe your access request is unfounded, repetitive or excessive. In this case we may charge you a reasonable fee to access your personal data or we may decide not to comply with your request. We will notify you if this is the case. We will require you to provide appropriate evidence of your identity before we respond to your request. Typically this identification evidence will be a photocopy of your passport or photo driving licence, which a solicitor or bank has certified as being a true copy of the original and a copy of a recent utility bill detailing your current address.

7.3 Our website may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

7.4 If you think that any of the data we hold about you is incorrect or inaccurate, you can contact us to correct such data. Please contact us at privacy@mackaywilliams.com for these purposes.

8. Changes to our privacy policy

Any changes we make to our privacy policy in the future will be posted on this page. Please check back frequently to see any updates or changes to our privacy policy.

9. Information about us

This privacy policy relates to MackayWilliams LLP (LLP registration number OC352484). The registered office address is at 1-2 City Business Centre, Hyde Street, Winchester, Hampshire, SO23 7TA and our main place of business is at Unit 6, St Saviours Wharf, 25 Mill Street, London, SE1 2BE. We can be contacted by post at Unit 6, St Saviours Wharf, 25 Mill Street, London, SE1 2BE, by phone 020 7232 4686 or by email privacy@mackaywilliams.com.

Our data protection team can be contacted using the details below.

10. Any questions?

Questions, comments and requests regarding this privacy policy are can be requested using any of the following addresses:

MackayWilliams LLP Data Protection Department Unit 6, St. Saviours Wharf, 25 Mill Street, London, SE1 2BE Email: privacy@mackaywilliams.com Phone: 020 7232 4686	MWB Ventures Limited Data Protection Department Unit 6, St. Saviours Wharf, 25 Mill Street, London, SE1 2BE Email: privacy@mackaywilliams.com Phone: 020 7232 4686
Fund Buyer Focus Limited Data Protection Department Unit 6, St. Saviours Wharf, 25 Mill Street, London, SE1 2BE Email: privacy@mackaywilliams.com Phone: 020 7232 4686	Fund Radar Limited Data Protection Department Unit 6, St. Saviours Wharf, 25 Mill Street, London, SE1 2BE Email: privacy@mackaywilliams.com Phone: 020 7232 4686

