

Thayer Brook Partners LLP (the “Firm”, “we”, “us” or “our”)

A limited liability partnership, with registered office at 2a Charing Cross Road, London, WC2H 0HF, and registered in England and Wales with registration number OC309908

PRIVACY POLICY

The privacy policy set forth here (“**Privacy Policy**”) applies to the Firm and affiliated companies of the Firm, all of which are committed to protecting and respecting your privacy.

Protecting Confidential Information

This policy, together with (depending upon how you access the Firm or provide data to the Firm) the Firm’s Terms & Conditions and any other documents referred to, governs how the personal data obtained by us, or provided to us is processed by us. We will take reasonable and proportional steps to protect personal information and ensure that it remains private. This policy summarizes the categories of personal information that we collect, how that information is handled, and how we protect that information. By visiting www.thayerbrook.co.uk (“**our site**”) Clients are accepting and consenting to the practices described in this policy. You can withdraw your consent at any time.

For the purpose of the Data Protection Act 1998 (“**the Act**”) and Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (the “**General Data Protection Regulation**” or “**GDPR**”), we act as the data controller and processor; and, there may be circumstances where we solely act as data processor.

As used in this policy, the term “**Regulations**” shall include, together, the Act and the General Data Protection Regulation, each of them, as from time to time applicable, amended, restated or supplemented.

Other than as may be outlined within this Privacy Policy, the Firm does not disclose any non-public personal information to anyone, except as required or permitted by law.

The Firm does not sell personal information.

Collection and Use of Personal Information

We collect non-public personal information from clients and prospective clients (as applicable), solely for the purposes specified:

- Information received on account applications or other forms, such as name, address, federal tax identification number, income, assets and similar information. We use this information to administer accounts, process transactions requested by clients, respond to client inquiries, evaluate client investment needs, and identify other products and services that may interest clients;
- Information about client transactions with, through, or by us or our affiliates, such as client account balances, transaction history and payment activity. This information is used to process transactions and ensure the accuracy of the records and reports we maintain that relate to client accounts. We may also retain transaction history for historical research and statistical analysis; and

- Information we collect or receive during communications with you and our affiliates, and due diligence which may include registers compiled by regulators such as the FCA, consumer reporting agencies, such as credit relationships and credit history. We use this information to help us fulfill our regulatory obligations and determine client eligibility for our products and services.

We may combine information that we receive about you from other sources with information you give to us and information we collect about you. We may use this information and the combined information for the purposes set out above (depending on the types of information we receive).

You will **not** supply to us, and we will not accept, any other person's personal data other than your own personal data, unless this data is relevant and required for the purposes of complying with a contractual arrangement between us.

Sharing of Information Within the Firm

The information we collect or any of our affiliate's collect relating to client transactions, accounts, account applications, due diligence and experiences with us may be shared among our affiliates.

Sharing of Information Outside the Firm

As permitted by law, we may disclose some or all of the information described above with entities that are not affiliated with us for the purpose of servicing the Client's account(s), improving our services, or providing products and services clients have requested from us. Such companies may include:

- companies that are the source or origin of financial services offered by us, such as collective investment schemes, futures commission merchants, banks, securities broker-dealers, mutual fund companies and insurance companies;
- nonfinancial companies, such as companies that perform services on behalf of us, auditors, companies that prepare account statements for us, or companies that assist us in communicating or marketing its services;
- others, such as independent contractors or technical system consultants who program our software, government agencies and regulators, consumer reporting agencies, and other outside entities as permitted or required by applicable laws;
- a third party who acquires us as the personal information held by us will be one of the transferred assets;
- 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 or apply our terms of use and other agreements; and/or
- to protect the rights, property, or safety of the Firm and our members or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction

Protecting the Confidentiality of Client Personal Information

All our employees of are instructed to use strict standard of care regarding the confidentiality of clients' non-public personal information as outlined in our policies. Employees not adhering to our policies are subject to disciplinary action. We require outside companies and independent contractors to

whom we provide customer information for servicing or processing to enter into a confidentiality agreement that restricts the use of the information to those purposes. We maintain physical, electronic and procedural safeguards that comply with applicable laws to protect client non-public personal information.

The information that we collect may be transferred to, and stored at, a destination outside the European Economic Area ("**EEA**"). It may also be processed by us or one of our suppliers operating outside of the EEA for the purposes set out above. By submitting your data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy and in compliance with the Regulations.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your data, we cannot guarantee the security of your data transmitted to our site; 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.

Retention and deletion of personal data

We will not retain and store any personal data for longer than necessary. The lawful basis for processing your data is because the processing is necessary for our legitimate interests including:

- maintenance of information which you have consented to our continuing to hold; or
- legitimate business purposes; or
- historical research and statistical analysis; or
- enable us to comply with our legal and/or regulatory obligations.

This means that we will retain your personal data for a period of not less than five (5) years, or as any other longer period that may be imposed to us by law or by the Regulations, allowed by your consent, or consistent with our continued legitimate interests (together the "**Data Retention Period**").

Upon elapsing of the Data Retention Period, all your personal data stored and retained by us will be deleted from our files and records.

Your rights

Your rights under the Regulations are:

Information

You have the right to be informed of your rights and how your personal data will be stored, treated, deleted and controlled, as is set out in this policy.

Access to information

You have the right to access your personal data, so that you are aware of, and can verify the lawfulness of, the processing. Your right of access can be exercised in accordance therewith. Any access request is free of charge.

Please note that we reserve the right to charge a reasonable fee taking into account the administrative costs of providing any further information or copies and we may refuse to respond to any access request, should any such request be manifestly unfounded or excessive, and if in particular, these requests are repetitive.

If any such requests are denied, you would have the right to complain to the supervisory authority (the Information Commissioner's Office).

Rectification

You have the right to rectify any data that is incorrect and, taking into account the purposes of the processing, you have the right to request that any incomplete information is completed.

Erasure

You can request that your data is erased:

- i. where the personal data is no longer necessary in relation to the purpose for which it was originally collected/processed;
- ii. when you wish to withdraw consent and there is no other legal ground for the processing of your personal data;
- iii. when you object to the processing and there is no overriding legitimate interest for continuing the processing;
- iv. when your personal data has been unlawfully processed in breach of the Regulations; and
- v. when your personal data has to be erased in order to comply with a legal obligation.

Restriction

You have the right to restrict the processing of your personal data in some circumstances, if personal data is 'restricted', we may only store the data and mark it with the aim of limiting its processing (effected by technical means such as quarantines or archives) in the future unless the processing is necessary for any legal or regulatory claim. Processing of your personal data will be restricted in any of the following circumstances:

- i. where there is a contest regarding the accuracy of your personal data, we will restrict any processing until the data has been verified;
- ii. where you object to the processing and pending verification of this objection we need to consider whether our legitimate grounds override yours;
- iii. when you oppose erasure and request restriction instead; and
- iv. if we no longer need your personal data but you require the data to establish, exercise or defend a legal claim.

Data Access Portability

You may also, free of charge, request to view, access and use your personal and transaction data in a way that is generally portable.

Objection

You may express an objection on grounds relating to your particular situation to:

- i. processing based on legitimate interests;
- ii. direct marketing (including profiling); and
- iii. processing for purposes of scientific/historical research and statistics.

Changes to our Privacy Policy

Any changes we may make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy policy and to ensure that you are happy with any such changes.

Communications with you

We may contact you by e-mail, post or telephone call or messaging, should any of these have been provided to us by you.

Contact

You can contact us in connection with this Privacy Policy:

- a) by e-mail at the following e-mail address: and should be addressed to scott@thayerbrook.co.uk
- b) by post, at our registered office address set out above; and
- c) by telephone, using the contact number published on our website from time to time.

Filing of complaints

If you have any complaints or concerns about the contents of this policy or your personal data stored, processed and/or controlled by us, you can address these by contacting us. You may also raise any complaint with the supervisory authority, the Information Commissioner's Office.