

MARWYN GROUP DATA PROTECTION PRIVACY POLICY

1. This policy
This policy is issued by the Marwyn Group and is applicable to all persons with whom we interact, including clients and their employees (together, "you").
2. Processing of personal data
Marwyn collects information about an individual, from which an individual is identifiable ("Personal Data") when it is provided to us either by you, your representatives, a third party or from public sources, including the internet and subscription databases.

The categories of Personal Data that we process include:

- Personal Details: names, dates of birth, copies of passport(s), employment history, tax records and other identification documents and tax identification numbers;
- Contact Details: residential addresses, telephone numbers and e-mail addresses; and
- Financial Details: bank account numbers and transaction records.

Marwyn does not routinely seek to collect or otherwise process data consisting of racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, genetic data, biometric data, data concerning health or data concerning a natural person's sex life or sexual orientation ("Sensitive Personal Data") unless:

- It is necessary for compliance with a legal obligation, including anti money laundering or the combating of the financing of terrorism;
- You have made the Sensitive Personal Data public; or
- We have obtained your prior consent.

The purposes for which we may process your Personal Data are:

Processing purpose	Legal basis for processing
Fulfilling our or your legal and regulatory compliance obligations, including those for the prevention of market abuse, tax evasion and money laundering, such as 'Know Your Customer' checks, confirming and verifying identify, and screening against subscription databases (for example, for sanctions and adverse media checks).	<ul style="list-style-type: none"> ▪ To comply with a legal obligation; or ▪ Necessary in connection with an engagement letter or other contract that you have entered into with Marwyn; or ▪ We have a legitimate interest for the prevention of market abuse, tax evasion, money laundering, sanctions violations and protection against fraud; or ▪ We have obtained your prior consent.
Business take on.	<ul style="list-style-type: none"> ▪ To comply with a legal obligation; or ▪ Necessary in connection with an engagement letter or other contract that you have entered into with Marwyn; or ▪ We have a legitimate interest in order to take on new business; or ▪ We have obtained your prior consent.
Provision of services.	<ul style="list-style-type: none"> ▪ To comply with a legal obligation; or ▪ Necessary in connection with an engagement letter or other contract that you have entered into with Marwyn; or ▪ We have a legitimate interest in order to provide services to you; or ▪ We have obtained your prior consent.

Processing purpose	Legal basis for processing
Audit, compliance or other risk management procedures.	<ul style="list-style-type: none"> ▪ To comply with a legal obligation; or ▪ We have a legitimate interest in order to manage the risks to which we are exposed.
Recruitment.	<ul style="list-style-type: none"> ▪ To comply with a legal obligation; or ▪ We have a legitimate interest in order to carry out recruitment; or ▪ We have obtained your prior consent.
Providing physical access to our premises or electronic access to our systems.	<ul style="list-style-type: none"> ▪ To comply with a legal obligation; or ▪ Necessary in connection with an engagement letter or other contract that you have entered into with Marwyn; or ▪ We have a legitimate interest in order to ensure the physical and electronic security of our business, premises and assets; or ▪ We have obtained your prior consent.

3. Disclosure of Personal Data within the Marwyn Group and to third parties

We may disclose your Personal Data to other entities within the Marwyn Group for legitimate business purposes, in accordance with applicable law. In addition, we may disclose your Personal Data to:

- Clients and their professional advisors;
- Third parties (for example, banking institutions) who provide services to Marwyn's clients;
- Service providers to Marwyn (for example, auditors, legal counsel, IT providers);
- Governmental, legal, regulatory or similar authorities upon request; and
- Other parties, if required to comply with legal or regulatory requirements.

4. Data security

We have implemented appropriate security measures designed to protect your Personal Data.

5. Data accuracy

We take reasonable steps designed to ensure the Personal Data we process is up to date. You should inform us of any changes to your Personal Data.

6. Data retention

We take reasonable steps to only retain hard and/or electronic copies of your Personal Data for as long as necessary in connection with the lawful purposes set out in this policy and for the duration required under applicable law. Once the retention periods have concluded, we will permanently delete or destroy the relevant Personal Data, archive it so that it is beyond use, or anonymise it.

7. Your legal rights

- (i) The right of access to obtain a copy of your Personal Data held by Marwyn;
- (ii) The right to have inaccurate Personal Data rectified, or completed if it is incomplete;
- (iii) The right to have your Personal Data erased, unless the data is necessary for Marwyn to comply with a legal or regulatory obligation, or for the establishment, exercise or defence of legal claims;
- (iv) The right to request the restriction or suppression of your Personal Data;
- (v) The right to data portability in order for you to obtain and reuse your Personal Data for your own purposes across different services;
- (vi) The right to object to the processing of your Personal Data, unless there are compelling legitimate grounds for the processing, which override the interests, rights and freedoms of the individual; or the processing is for the establishment, exercise or defence of legal claims;
- (vii) The right to withdraw your consent to the processing of your Personal Data at any time, where this is the sole legal basis for the processing; and

(viii) The right to lodge complaints with the UK Information Commissioner's Office regarding our processing of your Personal Data.

8. Contact details

The Marwyn Group's data controllers are Marwyn Investment Management LLP and Marwyn Capital LLP.

If you have any comments, questions or concerns about any information in this policy, or any other issues relating to the processing of Personal Data by the Marwyn Group, please contact your regular Marwyn contact or enquiries@marwyn.com.