

Privacy Policy

Updated: May 2018

This policy (together with the terms of use and any other documents referred to in it) sets out the basis on which any personal data WyeTree Asset Management Limited ('WyeTree') collects from you, or that you provide to WyeTree, or that will be processed by WyeTree. Please read the following carefully to understand WyeTree's views and practices regarding your personal data and how WyeTree treats it.

For the purposes of the General Data Protection Regulation (EU) 2016/679 (the 'GDPR'), the data controller is WyeTree.

1. Information WyeTree may collect and process about you

WyeTree may collect personal data about you, directly (where you are asked to provide the data), indirectly or implicitly when you communicate with WyeTree in person, in writing, by e-mail, by SMS, by fax, when you use this website or by telephone. WyeTree will, however, only use this personal data in accordance with the purposes set forth in this privacy policy and is committed to protecting and respecting your privacy.

WyeTree may collect and process the following data about you:

- Information that you provide by filling in forms. This includes information provided at the time of subscribing to any newsletter services via this website, e-mail, SMS, telephone or otherwise.
- If you communicate with WyeTree, it may keep a record of that correspondence.

When WyeTree uses personal data it ensures that the usage complies with law and the law allows and/or requires it to use personal data for a variety of reasons. These include where WyeTree:

- has obtained your consent;
- has legal and regulatory obligations that it must discharge;
- needs to do so in order to establish, exercise or defend its legal rights or for the purpose of legal proceedings;
- is using your personal data for its legitimate business interests, such as:
 - allowing it to effectively and efficiently manage and administer the operation of its business;

- maintaining compliance with its internal policies and procedures;
- monitoring the use of its copyrighted materials;
- enabling quick and easy access to information on WyeTree products;
- offering optimal, up-to-date security solutions for mobile devices and IT systems; and
- obtaining further knowledge of current threats to network security in order to update its security solutions.

WyeTree will take steps to ensure that your personal data is accessed only by employees of WyeTree that have a need to do so for the purposes described in this Privacy Policy. For more details please see paragraph 6 below.

2. Sensitive data

WyeTree does not seek to collect sensitive personal data (such as data revealing political opinions, religious beliefs or data concerning health or sex life). If WyeTree does seek to collect such data, your explicit prior consent will always be sought.

3. International transfers and storage of personal data

Some of the data that WyeTree collects from you may be transferred to, and stored at, destinations inside or outside the European Economic Area ("EEA"). It may also be processed by staff operating inside or outside the EEA who work for WyeTree, one of its associates, or for one of its or its associates' agents. Such staff may be engaged in, amongst other things, the provision of support services.

Where WyeTree transfers your personal data to another country outside the EEA, we will ensure that it is protected and transferred in a manner consistent with legal requirements. In relation to data being transferred outside of the European Economic Area (EEA), for example, this may be done in one of the following ways:

- the country that WyeTree sends the data to might be approved by the European Commission as offering an adequate level of protection for personal data;
- the recipient might have signed up to a contract based on "model contractual clauses" approved by the European Commission, obliging them to protect your personal data;
- where the recipient is located in the US, it might be a certified member of the EU-US Privacy Shield scheme; or
- in other circumstances the law may permit WyeTree to otherwise transfer your personal data outside Europe.

You can obtain more details of the protection given to your personal data when it is transferred outside Europe (including a copy of the standard data protection clauses which WyeTree have entered into with recipients of your personal data) by contacting us as described in paragraph 11 below.

Unfortunately, the transmission of information via the internet is not completely secure. Although WyeTree will do its best to protect your personal data, WyeTree cannot guarantee the security of your data transmitted to its website; any transmission is at your own risk.

4. Purposes of processing

WyeTree uses information held about you in the following ways:

- to provide you with information including newsletters about products or services that you request from WyeTree or products or services offered by WyeTree which WyeTree feels may interest you, where you have consented to be contacted for such purposes (or in the other circumstances described in this paragraph 4); or
- to notify you about changes to products or services.

If you are an existing client, WyeTree will only contact you by electronic means (e-mail or SMS) with information about products and services offered by WyeTree similar to those which were the subject of a previous sale to you.

If you are a new client or prospective one, WyeTree will contact you by electronic means only if you have consented to this or where WyeTree is permitted to contact you for such purposes without your consent.

If there is any change to your personal data which you have submitted to WyeTree, please contact WyeTree at the address in paragraph 11 so that it may ensure its records of your personal data are accurate and, where necessary, kept up to date. Personal data shall not be retained for longer than is necessary for the purpose for which it is held.

5. Disclosure of your information

WyeTree may disclose your personal information to the following categories of third parties and for the following purposes:

- with our business partners. For example, this could include our partners from whom you or your company or your organisation purchased the WyeTree product(s). Personal data will only be transferred to a business partner who is

contractually obliged to comply with appropriate data protection obligations and the relevant privacy and confidentiality legislation;

- with third party agents and contractors for the purposes of providing services to WyeTree (for example, WyeTree's professional advisors, marketing agents and its IT and communications providers etc.). These third parties will be subject to appropriate data protection obligations and they will only use your personal data as described in this Privacy Policy;
- if substantially all of WyeTree's assets or business are acquired by a third party, in which case personal data held by it may be one of the transferred assets; or
- if WyeTree is under a duty to disclose or share your personal data in order to comply with any legal obligation (whether in your jurisdiction or elsewhere) or in order to enforce or apply the terms of use and other agreements, or to protect the rights and property of WyeTree.

6. How long WyeTree keeps your personal data

How long WyeTree will hold your personal data for will vary and will be determined by the following criteria:

- the purpose for which WyeTree is using it – WyeTree will need to keep the data for as long as is necessary for that purpose; and
- legal obligations – laws or regulations may set a minimum period for which WyeTree has to keep your personal data.

7. Your rights

In all the above cases in which WyeTree collects, uses or stores your personal data, you may have the following rights and, in most cases, you can exercise them free of charge. These rights include:

- the right to obtain information regarding the processing of your personal data and access to the personal data which WyeTree holds about you;
- the right to withdraw your consent to the processing of your personal data at any time. Please note, however, that WyeTree may still be entitled to process your personal data if it has another legitimate reason for doing so. For example, it may need to retain personal data to comply with a legal obligation;
- in some circumstances, the right to receive some personal data in a structured, commonly used and machine-readable format and/or request that WyeTree transmits those data to a third party where this is technically feasible. Please note that this right only applies to personal data which you have provided directly to WyeTree;

- the right to request that WyeTree rectifies your personal data if it is inaccurate or incomplete;
- the right to request that WyeTree erases your personal data in certain circumstances. Please note that there may be circumstances where you ask WyeTree to erase your personal data but it is legally entitled to retain it;
- the right to object to, or request that WyeTree restricts, its processing of your personal data in certain circumstances. Again, there may be circumstances where you object to, or ask WyeTree to restrict, its processing of your personal data but it is legally entitled to refuse that request; and
- the right to lodge a complaint with the relevant data protection regulator if you think that any of your rights have been infringed by WyeTree.

You can exercise your rights by contacting WyeTree at the address given below.

8. Cookies

WyeTree generally records certain usage information, such as the number and frequency of visitors to our Website. This information may include the Internet browser you are using and your Internet Protocol (IP) address. If WyeTree uses such data at all it will be on an aggregate basis, and we will not disclose to third parties any personal information that could be used to identify you.

Cookies or other technology help WyeTree to provide customised services and information. You are always free to decline our cookies if your browser permits, although in that case you may not be able to use certain features on our Website.

9. Amendments

WyeTree reserves the right to modify sections of this privacy policy at any time.

10. How to contact WyeTree

If you have any questions or concerns about this privacy policy, WyeTree's data processing activities, or you wish to access or update the information held about you, you may contact WyeTree at:

1 Tudor Street, London, EC4Y 0AH, United Kingdom;

or via e-mail at contacts@wyetreeam.com

We are usually able to resolve privacy questions or concerns promptly and effectively. If you are not satisfied with the response you receive from our CCO, you may escalate concerns to the applicable privacy regulator in your jurisdiction. Upon request, WyeTree's CCO will provide you with the contact information for that regulator.