



Protecting Your Privacy E. I. Sturdza Strategic Management Limited

Who We Are

E.I. Sturdza Strategic Management Limited ('we' or 'us' or 'our') is an independent investment fund company in Guernsey, Channel Islands under company number 35985. E.I. Sturdza Strategic Management Limited and its subsidiary (E.I. Sturdza Investments Limited, a limited liability company registered in England and Wales (Company number 08589926) (collectively "Sturdza") will gather and process your personal information in accordance with this Privacy Notice and in compliance with the relevant data protection regulation and law. This Privacy Notice provides you with the necessary information regarding your rights and obligations, and explains how and when we collect and process your personal data.

Our registered office is at **3rd Floor, Frances House, Sir William Place, St Peter Port, Guernsey GY1 1GX**. We are registered on the Data Commissioner's Register of Data Controllers under registration number 12779. We have appointed a Responsible Officer who is responsible for overseeing questions in relation to this Privacy Notice. The Responsible Officer is **Rosemarie Toussaint-Stephens**. Any questions in relation to this Privacy Notice or requests in respect of personal data should be directed to data.privacy@eisturdza.com in the first instance.

Information That We Collect

We process your personal information to meet our legal, statutory and contractual obligations. We will never collect any unnecessary personal data from you and do not process your information in any way, other than as specified in this Privacy Notice.

The Data We Hold:

The type of data we may collect and process includes:

- Contact details (including names, postal addresses, email addresses and telephone numbers);
- Information required for Sturdza to meet legal and regulatory requirements, in particular in respect of anti-money laundering legislation, including information on source of funds and source of wealth;
- Financial information, such as payment related information;
- Meetings attended and visits to our / your offices;
- Any other information you may provide to us.

How We Use Your Personal Data

Sturdza takes your privacy very seriously and will never disclose or share your data without your consent; unless required to do so by law. Under no circumstances will we ever sell your data. We only retain your data for so long as is necessary for the purpose(s) specified in this Privacy Notice. Where you have consented to us providing you with marketing materials, you are free to withdraw this consent at any time. ***The purposes and reasons for processing your personal data are detailed below:-***

Purpose	Lawful Basis for Processing
To enter into client relationships	Any one or more of the following: The legitimate interest of Sturdza as a provider of investment management services to process personal data in the performance of its contractual obligations. In instances where an individual has been provided with this Privacy Notice and provides personal data thereafter, the processing may be carried out on the basis of consent. Consent may be withdrawn at any time in writing by contacting data.privacy@eisturdza.com

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To manage our client and other business relationships	The legitimate interests of Sturdza to seek to ensure its business is conducted efficiently and with a view to enhancing its services.
To ensure the security of our systems, staff and premises	The legitimate interests of Sturdza in protecting its systems, staff and premises from being misused or the victim of any criminal activity
To provide our contacts with marketing material and to invite contacts to events which may be of interest to them and to manage such mailings and events	The legitimate interests of Sturdza as a provider of investment management services to process personal data to communicate with individuals on topics and events which may be of interest to those individuals. The rights of those individuals to unsubscribe from mailings will be detailed within all mailings and any requests to unsubscribe may be made via links available in those mailings or by emailing data.privacy@eisturdza.com
To meet all legal and regulatory obligations applicable to Sturdza	The legitimate interests of Sturdza as a provider of investment management services to process data to the extent necessary to ensure it meets all legal contractual, legal and regulatory obligations incumbent on it.

Your Rights

Data subjects in the European Union (or any jurisdiction with equivalent legislation to the European Union General Data Protection Regulation) have certain rights in respect of their personal data.

Any such data subject wishing to exercise their rights under applicable data protection laws (including the right to withdraw any consent to processing previously given; the right of access to data, or to have data corrected, updated, rectified or erased; or for access to data to be restricted or provided to any third party; or to object to any particular processing or the right to data portability) should send the request in the first instance to data.privacy@eisturdza.com

In the case in which a data subject chooses not to provide any personal data or where any of the rights set out above are exercised to limit the processing of personal data, we may be unable to provide relevant services, or there may be a restriction on the services that can be provided.

If we receive a request from you to exercise any of the above rights, we may ask you to verify your identify before acting on the request; this is to ensure that your data is protected and kept secure.

Data subjects also have the right to lodge a complaint with the Supervisory Authority.

Sharing and Disclosing Your Personal Information

We do not share or disclose any of your personal information without your consent, other than for the purposes specified in this Privacy Notice or where there is a legal requirement to do so. **Sturdza** uses third-party/third-parties to provide certain business functions; however all processors acting on our behalf only process your data in accordance with instructions from us and comply fully with this Privacy Notice, the data protection laws and any other appropriate confidentiality and security measures as may be appropriate. The third parties with which we may share or disclose your personal data include the following:

- Any sub-contractors, agents or service providers of Sturdza;
- Third parties with whom Sturdza engages for hosting events or other marketing initiatives;
- Regulators or other governmental or supervisory bodies with a legal right to the material.

Safeguarding Measures

Sturdza takes your privacy seriously and takes every reasonable measure and precaution to protect and secure your personal data. We work hard to protect you and your information from unauthorised access, alteration, disclosure or destruction and have several layers of security measures in place, **including:-**

- TLS

- Restricted access
- IT authentication
- Firewalls
- Anti-virus/malware
- Cyber Essentials Plus Certification
- ISAE 3402

Transfer Outside the EU

Personal data in the European Union is protected by the General Data Protection Regulation (GDPR). Some countries may not necessarily have the same high standard of protection of your personal data. Personal data collected from you or provided by you may be transferred outside of Guernsey.

Therefore when you **use our website or send us an email**, the personal information you submit may be stored on servers which are hosted in Guernsey and the EU.

We will take steps to ensure that we use the necessary level of protection for your information and abide by strict agreements and measures to protect your data and comply with the relevant data protection laws.

Consequences of Not Providing Your Data

You are not obligated to provide your personal information to **Sturdza**, however as this information is required for us to provide you our services, we will not be able to offer our services without it.

How Long We Keep Your Data

Sturdza only ever retains personal information for as long as is necessary and we have strict review and retention policies in place to meet these obligations. **Sturdza's** policy is to retain data for 6 years from the conclusion of the relationship after which time it will be destroyed. This is subject to certain exceptions (where in each case, records may be kept indefinitely) or in instances where the personal data is relevant to a dispute after closure of a matter or where the data cannot be deleted for other reasons.

Any requests for further information in relation to the continued processing of specific data, and requests for destruction of data, should be made to data.privacy@eisturdza.com

Marketing

Occasionally, **Sturdza** would like to contact you and provide you with factsheets, monthly commentaries, weekly reports or themed articles that we provide or periodic/adhoc updates regarding our funds and business. If you consent to us using your contact details for these purposes, you have the right to withdraw your consent at any time by using the opt-out/unsubscribe options or by contacting data.privacy@eisturdza.com directly.

Telephone Recordings

The telephone calls and electronic communications that you make to and receive from us may also be recorded, maintained, stored and used by us in connection with record keeping, dispute resolution, security and/or for training purposes.

Changes to this Privacy Notice

We will keep this Privacy Notice under review and any updates will appear on our website at www.eisturdza.com

We last updated this Privacy Notice on 1 June 2018.

How to contact us

If you have any questions about this Privacy Notice or any data which we hold about you, please contact: data.privacy@eisturdza.com