

PRIVACY NOTICE

Pacific Assets Trust plc

Background

This Notice gives information on how Pacific Assets Trust plc collects, uses and protects the personal data held about investors, clients, intermediaries and other business contacts.

This Notice describes how we will fulfil our obligations under applicable data protection laws, including Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 (the **General Data Protection Regulation** or **GDPR**).

Information about us

For the purposes of GDPR, the data controller is Pacific Assets Trust plc of 16 Charlotte Square, Edinburgh EH2 4DF (together **we**, **us** or **our**).

First Sentier Investors (UK) IM Limited is responsible for the operation of this website and investment management (**Stewart Investors**)).

In addition, our registrar is responsible for maintaining the shareholder register. As part of the agreement with our registrar, they are required to collect, store and use your personal data only in accordance with our instructions. References in this Notice to us undertaking to do anything includes a reference to Stewart Investors in their capacity as investment manager, unless we otherwise specify.

Information we may collect

We collect from time to time, personal data on investors, intermediaries and other business contacts from a number of sources, including from: investor application forms; other Stewart Investors forms (including website forms); correspondence, conversations with clients, advisers, intermediaries; business cards; third party service providers to our funds (for example, transfer agents, administrators, distributors, custodians, paying agents); client advisers; other third parties; and from public sources. This information may be collected directly from investors, intermediaries and business contacts, or indirectly from third parties, as follows:

From you

We may collect from you and process the following personal data, depending on the nature of our business relationship with you:

- Your name; address (including proof of name and address); photo identification; contact details both personal and work (for example, your email and phone numbers); hobbies and interests; job title and company; nationality; citizenship; tax residency; date of birth; passport details; national insurance number and other tax details; adviser details; investment details; banking details; signed contracts with you; business cards, contact sheets and biographies; financial dealings; family connections; details of your company's directors, secretaries, authorised signatories and identification documents; details of any complaints made; data received from due diligence activities (such as anti-money laundering, politically exposed persons and sanctions checks); responses to surveys and competitions; fraud enquiries (for example, information from police reports); images

captured by CCTV cameras on our premises; recordings of telephone conversations and electronic communications with our staff.

- By the use of **cookies** on this site in accordance with our **Cookies Policy**.

From third parties

We may collect personal data about you from third parties, depending on the nature of our business relationship with you, in particular:

- **Third party service providers to our funds** (for example, transfer agents, registrars, administrators, distributors, custodians and paying agents) – information received includes personal details of investors obtained from fund application forms such as: name; address; contact details; nationality; national insurance number; date of birth; tax residency; adviser details; investment details; bank account details.
- **Your advisers (including independent financial advisers)** – information received may include your name, address, gender, date of birth; bank details.
- **Our vendors** such as Experian and World-Check – information received includes the results of “Know Your Client”, anti-money laundering, politically exposed persons and sanctions checks.
- **Publicly available sources** such as MandateWire and LinkedIn – information available includes contact details of institutional investors (MandateWire) and details of job title, company, former employers and roles, and connections (LinkedIn).

How we will use the information we collect

The information we collect and use will depend on the nature of our business relationship with you, as follows:

- In relation to **prospective investors**, we may process personal data for identification purposes (prior to becoming an investor), for the purposes of anti-money laundering, counter terrorist financing, suitability and appropriateness assessments, “Know Your Client” and credit-worthiness checks, and for any other applicable legal or regulatory reasons. Failure to provide relevant information will mean that we will not be able to on-board a potential investor.
- In relation to **investors in our funds**, we may process information collected for the purpose of account administration and other general business purposes (for example, for processing subscriptions and investments; maintaining the share register of investors, carrying out investor instructions; handling any complaints and enquiries; and sending investor communications, including financial reports, valuations, corporate actions). In addition, in order to comply with regulatory obligations, we may collect and disclose certain information about our investors and certain related persons and their investments to HM Revenue & Customs and/or other relevant tax authorities overseas.
- We may from time to time process personal data of **investors** to comply with legal and regulatory requirements impacting our business. In particular, we may need in the context of our business: to obtain legal advice on legal and regulatory requirements; to report to relevant regulators; to comply with market opening and registration requirements in the conduct of our business.

- In relation to **intermediaries who introduce investors into our funds** (such as distributors, platforms and independent financial advisers), we may process personal data to conduct market research, gauge product sales or product performance or assess the creditworthiness of intermediaries. In addition, we may process the personal data of investors introduced to our funds, as outlined above.
- **Monitoring purposes:** we may process personal data to analyse the performance of IT systems, monitor usage of resources and systems and to improve products, services and usability of our technology platform, including telephone calls and electronic communications with our staff which may be recorded for the purposes of retaining a record of communications, in the interests of security, for training and compliance monitoring purposes and/or to comply with legal or regulatory obligations.
- **Where you have provided your consent, we may process your personal data for the purposes of informing you (for example, by telephone, mail and email) about other products and services available from Stewart Investors and of marketing campaigns and event invitations.**

We are entitled to use your personal data in these ways because:

- We have legal and regulatory obligations that we have to discharge;
- We may need to in order to establish, exercise or defend our legal rights or for the purpose of legal proceedings;
- The use of your personal data as described is necessary for our legitimate business interests (or the legitimate interests of one or more of Stewart Investors' affiliates or our service providers);
- The use of your personal data is necessary for the performance of a contract with you;
- You have provided your consent to us processing your personal data (other than for marketing purposes); or
- **You have provided your consent to us processing your personal data for the purposes of informing you (for example, by telephone, mail or email) about other products and services available from Stewart Investors and of marketing campaigns and event invitations.**

Disclosure of your information

- We may disclose your personal data to any member of the Stewart Investors group, which means our affiliates, for internal business and administrative purposes (including to administer our products and services and for prudential and risk management purposes) and, **where you have given your consent**, to provide you with information on related products and services. We may also disclose personal data relating to our clients to members of the Stewart Investors group to whom we sub-delegate our services (for example, trade order execution and portfolio management).
- We may disclose your personal data to third parties that are specifically engaged by us to provide services to us, in which case we will require those parties to keep that information confidential and secure and to use it solely for the purpose of providing the specified services to us. The following is a list of the types of third parties who may process your personal data on our behalf:
 - third party service providers to our funds (for example, transfer agents, administrators, distributors, custodians, paying agents and researchers)
 - credit reference agencies, debt collection agencies and other companies for use in credit decisions, for fraud prevention, to pursue debtors and for the verification of identity

- document execution vendors in relation to the execution of contracts with our clients;
 - insurance brokers;
 - professional advisers (for example, accountants/tax advisors and legal advisors).
- Where we disclose your personal data to third party service providers, they may need to use your information to comply with their own legal obligations, including under anti-money laundering legislation. In the case of the custodians, your personal data may also be used by them in the discharge of their respective statutory oversight and monitoring obligations. Administrators may use your personal data for the purposes of anti-money laundering verification and monitoring in connection with investments made by you in other collective investment schemes administered by that administrator. In those cases, the relevant service provider will be acting as a controller in respect of your personal data, and its use of your personal data will be subject to its privacy policy.
 - If you use a financial adviser (as indicated on your investor application form), then details of your investments and valuations may also be provided to such financial adviser.
 - We may disclose to relevant tax authorities, regulators, government departments or competent authorities of the UK or of other countries, any personal data (including tax status, identity or residency or other personal and payment information, documents or self-certifications) in order to comply with a court order or to meet legal and regulatory requirements arising in the conduct of our business. Such disclosure may be made directly to such regulators or competent authorities or made indirectly to our advisers or providers who will make such filings or disclosures on our behalf.

Transfers outside the EEA

We may transfer your personal data to Stewart Investors' overseas affiliates (including outside the EEA) and/or allow the information to be accessed by their affiliates and their employees outside the EEA as well as within. It may also be processed by personnel operating outside the EEA who work for us or for one of our third party service providers.

Where we transfer your personal data outside the EEA, we will ensure that it is protected in a manner that is consistent with how your personal data will be protected by us in the EEA or that the transfer is otherwise compliant with data protection laws. This can be done in a number of ways, for example:

- the country that we send the data to might be approved by the European Commission;
- 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;
- where data protection laws permit us to transfer your personal data outside the EEA.

You can obtain more details of the protection given to your personal data when it is transferred outside the EEA (including a copy of any standard data protection clauses which we have entered into with recipients of your personal data) by contacting communications@stewartinvestors.com or by writing to us at Stewart Investors, 23 St. Andrew Square, Edinburgh, EH2 1BB, Scotland.

How long will we store your data?

Personal data held by us will be kept confidential. How long we hold your personal data for will vary and will be determined by various criteria, including:

- the purpose for which we are using it – we 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 we have to keep your personal data.

Your rights in relation to your data

If you wish to contact us for any of the reasons below, please e-mail us at by contacting communications@stewartinvestors.com or write to us at Stewart Investors, 23 St. Andrew Square, Edinburgh, EH2 1BB, Scotland.

- You have a **right to access** the information which we hold about you. If you wish to make an application to access or obtain this information, please contact us. In some circumstances, you have the right to receive some personal data in a structured, commonly used and machine-readable format and/or request that we transmit that data to a third party where this is technically feasible. Please note that this right only applies to personal data which you have provided to us.
- We take reasonable steps to ensure that the personal data we collect, use or disclose is **accurate, complete and up to date**. Please contact us if any of the details you have provided change. Please also contact us if you believe that the information we have about you is not accurate, complete or up to date.
- If you wish us to **erase or restrict** using your data, please contact us. We may need to discuss with you the basis of your request as there may be circumstances where we are legally entitled to continue processing your personal data/refuse your request.
- If you have previously provided your consent to our use of your data (other than for marketing purposes) and you wish to **withdraw such consent**, please contact us. We may need to discuss with you whether our use of your data needs to continue for lawful purposes (i.e. because we have another legitimate reason (other than your consent) for doing so).
- **If you have previously consented to being sent information about other products and services available from Stewart Investors, you may withdraw such consent by contacting us.**
- If you have any **complaints** in relation to the way we have used your personal data, please contact us in the first instance. You also have the right to lodge a complaint with the **Information Commissioner's Office** at Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF (Tel: 0303 123 1113) if you think that any of your rights have been infringed by us.

Other Products and Services

- If you would like to receive further information from us about other products or services offered by Stewart Investors, please ensure you tick the relevant box on the appropriate application form or contact us by e-mailing us at communications@stewartinvestors.com or by writing to us at Stewart Investors, 23 St. Andrew Square, Edinburgh, EH2 1BB, Scotland.

Recording of telephone conversations and electronic communications

Please note that we are required to record telephone conversations (we will do so without a warning) and to keep copies of electronic communications. We are required to keep copies of these recordings and electronic communications for a period of five years (or up to seven years at the request of a

regulator). Copies may be provided to you upon request by contacting communications@stewartinvestors.com

Changes to our Privacy Notice

This Notice was updated in March 2021. We reserve the right to change this Notice at any time. We will ensure that any changes to this Notice are added to the Notice available on our website on their effective date.