

TSAM Privacy Policy

Trinity Street Asset Management LLP (“TSAM”), takes the privacy of customers (“you”) seriously and aims to protect that privacy as far as possible. TSAM is a “data controller” in respect of any personal information we hold about you as our customer.

TSAM will amend this privacy notice from time to time. This privacy notice was last updated in May 2024.

Contact Us

If you have any questions about this privacy notice or our privacy related practices, you can contact us:

- at the following address: Trinity Street Asset Management LLP, 25 Golden Square, London, W1F 9LU, UK.
- by email at: compliance@trinitystreetam.com
- by phone at: +44 (0) 207 495 9110.

How we obtain your information:

In the course of providing services to you, or receiving services from you, we collect information that personally identifies you. The information we collect about you (or your staff) comes from:

- application forms or other materials you submit to us during the course of your relationship with us;
- your interactions with us, transactions and use of our products and services;
- your business dealings with us, including via email, telephone or as stated in our contracts with you;
- depending on the products or services you require, third parties (including for money laundering checks, among other things); and
- recording and monitoring tools that we use for compliance or security purposes (e.g. recording of telephone calls, monitoring emails, etc.).

The information we collect

If you are our customer, we collect information that helps us to identify you and to manage your accounts. We also collect financial information about you, information about your transactions with us and information required for us to carry out money laundering and other checks and to comply with our legal obligations.

Where you are our customer, information that we collect can include:

- your name, title and contact details;
- your professional title and occupation;

- Your age and marital status;
- financial information;
- personal identifiers such as your social security number, national insurance number, tax file number, IP address or our internal electronic identifiers;
- information which we might need to conduct ‘know your client’ checks such as details relating to your passport and credit history; and
- other information you provide to us in the course of your dealings with us or which we require to provide you with TSAM’s services.

In limited cases, we also collect what is known as “special categories” of information. Our money laundering, sanctions, financial crime and fraud prevention checks sometimes result in us obtaining information about actual or alleged criminal convictions and offences.

You are not obliged to provide us with your information where it is requested but we may be unable to provide certain products and services or proceed with our business relationship with you if you do not do so. Where this is the case, we will make you aware.

Our use of your information

Where you are our customer, we collect, use, share and store information about you to process transactions and to improve the quality of the service that we provide to you.

When processing your information, we do so in our legitimate interests (as set out in the bullet points below), because of legal obligations that we are subject to or because the information is required either in order to provide our products or services to you or to receive products and services from you in accordance with a contract.

Where we process “special categories” of information about you, we do so either because you have given us your explicit consent, we are required by law to do so or the processing is necessary for the establishment, exercise or defence of a legal claim.

We use your information for the purposes of the following legitimate interests:

- to permit, administer and record your investment in any of our funds;
- to administer, operate, facilitate and manage your account(s) with us and your use of our services and products;
- to manage any funds that you invest in with us and to communicate with you in connection with your investment in our funds;
- in connection with TSAM’s internal management and reporting;
- to facilitate our internal business operations, including assessing and managing risk and fulfilling our legal and regulatory requirements.

How we share your information

We share certain information within TSAM with our third party partners, business associates, affiliates and subcontractors, and with other third parties for the purposes set out in this policy.

We disclose personal information to third parties, subcontractors, agents and any person (“Third Parties”) who provides professional, legal, accounting advice or other services to TSAM or the TSAM sponsored funds, who will use such information in the course of providing advice or other services to you and for the purposes that we specify. Such Third Parties may, for example, process data:

- to facilitate the opening of your account or investment in a fund, the management and administration of your holdings in your account or in a fund and any related account on an ongoing basis which are necessary for the performance of your contract in relation to the account or with the fund, including without limitation the processing of redemption, conversion, transfer and additional subscription requests, and the payment of distributions;
- in order to carry out anti-money laundering checks and related actions which TSAM considers appropriate to meet any legal obligations imposed on TSAM, or the administrator relating to, or the processing in the public interest, or to pursue the legitimate interests of TSAM or the administrator in relation to, the prevention of fraud, money laundering, terrorist financing, bribery, corruption, tax evasion and to prevent the provision of financial and other services to persons who may be subject to economic or trade sanctions, on an on-going basis, in accordance with TSAM's, and the administrator's anti-money laundering procedures.
- to report tax related information to tax authorities in order to comply with a legal obligation;
- to monitor and record calls and electronic communications (i) for processing verification of instructions; (ii) for investigation and fraud prevention purposes; (iii) for crime detection, prevention, investigation and prosecution; (iv) to enforce or defend TSAM, the administrator's or their affiliates' rights, themselves or through third parties to whom they delegate such responsibilities or rights in order to comply with any legal obligation imposed on TSAM or the administrator; (v) to pursue the legitimate interests of TSAM or the administrator in relation to such matters; or (vi) where the processing is in the public interest;
- to disclose information to other third parties such as service providers of a fund, auditors, regulatory authorities and technology providers in order to comply with any legal obligation imposed on TSAM, or the administrator or in order to pursue the legitimate interests of TSAM, or the administrator;

- to monitor and record calls for quality, business analysis, training and related purposes in order to pursue the legitimate interests of TSAM, or the administrator to improve their service delivery;
- to update and maintain records and carry out fee calculations;
- to retain anti money laundering and other records of individuals to assist with subsequent screening of them by the administrator including in relation to your investment; and
- to facilitate the provisions of appropriate outsourcing services in connection with our business or your dealings with us

All such Third Parties are required to maintain the confidentiality of such information to the extent they receive it.

We also disclose your personal information or any portions thereof (a) as required by, or to comply with, applicable law, regulation, court or other legal process or other statutory requirement; (b) at the request of any regulatory, supervisory or governmental authorities and (c) to protect the rights, property, or safety of our business, our partners and employees, or others. This may include exchanging information with other companies and organizations for the purposes of cybersecurity and fraud protection.

How we transfer your information

We use cloud-based technologies and do business in a global marketplace. Subject to compliance with applicable legal requirements and safeguards, we may process, store or transfer the personal data we collect in and to a country outside of your own, with different privacy laws that may or may not be as comprehensive as your own. By submitting your personal data or engaging with us, you consent to this transfer, storing or processing.

Retention of information

We will hold your personal information on our systems for the longest of the following periods:

- a minimum of six years; or
- as long as is necessary for the relevant activity or as long as is set out in any relevant agreement you enter into with us;
- the length of time it is reasonable to keep records to demonstrate compliance with professional or legal obligations;
- any retention period that is required by law;
- the end of the period in which litigation or investigations might arise in respect of the services that we provide to you.

Your rights

Data protection laws may provide you with rights to object to marketing.

They may also provide you with rights including rights to access data, as well as rights for data to be erased, corrected, used for only limited purposes, not used at all, or transferred to you or a third party. You can seek to exercise any of these rights by contacting us at the details set out in the “Contact Us” section above. You may have the following rights under data protection laws:

Right of subject access: The right to make a written request for details of information about you held by TSAM and a copy of that information.

Right to rectification: The right to have inaccurate information about you rectified.

Right to erasure ('right to be forgotten'): The right to have certain information about you erased.

Right to restriction of processing: The right to request that your information is only used for restricted purposes.

Right to object: The right to object to the use of your information, including the right to object to marketing.

Right to data portability: The right, in certain circumstances, to ask for information you have made available to us to be transferred to you or a third party in machine-readable formats.

Right to withdraw consent: The right to withdraw any consent you have previously given us to handle your information. If you withdraw your consent, this will not affect the lawfulness of TSAM's use of your information prior to the withdrawal of your consent.

Please note that these rights are not absolute: they do not always apply and exemptions may be engaged. We may, in response to a request, ask you to verify your identity and to provide information that helps us to understand your request better. If we do not comply with your request, we will explain why.

If you are unhappy with the way we have handled your information you may have a right to complain to the data protection regulator in the State where you live or work, or where you think a breach of your personal information has taken place.

In the UK, your local regulator is the Information Commissioner. The website is available at <https://ico.org.uk>.

Security

TSAM takes the protection of your personal information seriously, and has security measures and policies in place to address this. All TSAM staff are made aware of their information security responsibilities.

Changes to our Privacy Notice

We will post any updates to this privacy notice on our website. Please check back frequently to see any updates or changes.
