



Kepler

Kepler Partners LLP

70 Conduit Street

London

W1S 2GF

T: +44 (0) 20 3384 8796

www.keplerpartners.com

At Kepler Partners LLP, we are committed to protecting the privacy of your personal data and we summarize here our policies regarding the collection, use and transfer of your personal data, the security measures we employ to protect such data and your rights and choices with regard to access or use of such data.

We may change this Policy from time to time so please check this page occasionally to ensure that you are happy with any changes. By using our websites, you are agreeing to be bound by this Policy.

Any questions regarding this Policy and our privacy practices should be sent by email to compliance@keplerpartners.com or by writing to Kepler Partners LLP, 70 Conduit Street, London, W1S 2GF. Alternatively, you can telephone +44 (0) 20 3887 6342.

Who are we?

We are a corporate advisory boutique specialising in the regulated funds market in Europe. Our business is constructed from four core verticals:

- *Alternative UCITS research and consultancy*
- *UCITS asset raising*
- *Fund Platform - Kepler Liquid Strategies*
- *Investment trust research & consultancy*

Kepler Partners is headquartered in London. The company is organised under the laws of the United Kingdom, registered with the Financial Conduct Authority, with Companies House Number OC334771 and having an address at 70 Conduit Street, London, W1S 2GF

How do we collect information from you?

We obtain information about you when you use our websites, for example, when you contact us about products and services, or if you register to receive one of our regular updates.

What type of information is collected from you?

The personal information we collect might include your name, address, email address, IP address, and information regarding what pages are accessed, including via Google analytics tracking software. This software tracks the activity associated with the cookies described above during your visits to our websites (but not anywhere else) so we know how long you spend on each page, for example, and where you are located. This software doesn't tell us anything about your activity elsewhere on the web – only what you do whilst on our own websites.

How is your information used?

We may use your information to:

- to carry out our obligations arising from any contracts entered into by you and/or us;
- seek your views or comments on the services we provide - where we might mount a survey, asking your views on matters, in which case we might also ask you for personal details directly;
- notify you of changes to our services;
- send you communications which you have requested and that may be of interest to you;

We review our retention periods for personal information on a regular basis. We are legally required to hold some types of information to fulfil our statutory obligations. We will hold your personal information on our systems for as long as is necessary for the relevant activity, or as long as is set out in any relevant contract you hold with us.

Who has access to your information?

We will not sell or rent your information to third parties.

We will not share your information with third parties for marketing purposes.

Third Party Service Providers working on our behalf: We may pass your information to our third party service providers, agents, subcontractors and other associated organisations for the purposes of completing tasks and providing services to you on our behalf. However, when we use third party service providers, we disclose only the personal information that is necessary to deliver the service and we have a contract in place that requires them to keep your information secure and not to use it for their own direct marketing purposes. Please be reassured that we will not release your information to third parties beyond the network for them to use for their own direct marketing purposes, unless you have requested us to do so, or we are required to do so by law, for example, by a court order or for the purposes of prevention of fraud or other crime.

Your choices

You have a choice about whether or not you wish to receive information from us. If you do not want to receive direct marketing communications from us, then you can either unsubscribe on the relevant email, or select your choices by ticking the relevant boxes situated on the website form on which we collect your information.

Unless we have identified a legitimate interest or you have given prior consent, we will not contact you for marketing purposes by email or phone. We will not contact you for marketing purposes by post if you have indicated that you do not wish to be contacted. You can change your marketing preferences at any time by contacting us by email: compliance@keplerpartners.com

How you can access and update your information

The accuracy of your information is important to us. We are working on ways to make it easier for you to review and correct the information that we hold about you. In the meantime, if you change email address, or any of the other information we hold is inaccurate or out of date, please email us at: compliance@keplerpartners.com

Security precautions in place to protect the loss, misuse or alteration of your information

When you give us personal information, we take steps to ensure that it is kept securely.

Non-sensitive details (your email address etc.) are transmitted normally over the Internet, and this can never be guaranteed to be 100% secure. As a result, while we strive to protect your personal information, we cannot guarantee the security of any information you transmit to us, and you do so at your own risk. Once we receive your information, we make our best effort to ensure its security on our systems.

Profiling

We may analyse your personal information to create a profile of your interests and preferences so that we can contact you with information relevant to you. Behaviour of our audience is monitored via our websites as well as an email system called Campaign Monitor.

We may make use of additional information about you when it is available from external sources to help us do this effectively.

Use of 'cookies'

Like many other websites, the Kepler websites use cookies. 'Cookies' are small pieces of information sent by an organisation to your computer and stored on your hard drive to allow that website to recognise you when you visit. They collect statistical data about your browsing actions and patterns and do not identify you as an individual. For example, we use cookies to store your country preference. This helps us to improve our website and deliver a more personalised service.

It is possible to switch off cookies by setting your browser preferences.

16 or Under

We are concerned to protect the privacy of children aged 16 or under. If you are aged 16 or under, please get your parent/guardian's permission beforehand whenever you provide us with personal information.

Transferring your information outside of Europe

As part of the services offered to you through this website, the information which you provide to us may be transferred to countries outside the European Union ("EU"). By way of example, this may happen if any of our servers are from time to time located in a country outside of the EU. These countries may not have similar data protection laws to the UK. By submitting your personal data, you're agreeing to this transfer, storing or processing. If we transfer your information outside of the EU in this way, we will take steps to ensure that appropriate security measures are taken with the aim of ensuring that your privacy rights continue to be protected as outlined in this Policy.

If you use our services while you are outside the EU, your information may be transferred outside the EU in order to provide you with those services.

Review of this Policy

We keep this Policy under regular review. This Policy was last updated in May 2019.