



## **Privacy notice**

This Privacy Notice, effective 25 May 2018, is designed to help you understand our information collection practices and explain how we use the personal information that Argo Capital Management Limited (“Argo”) collects in relation to this website and our products and services. Argo recognises the importance of protecting information about you (“**Personal Data**”) and is responsible for ensuring that it uses that Personal Data in compliance with data protection laws including the General Data Protection Regulation (“**GDPR**”) in Europe and other related laws protecting Personal Data.

### **Scope**

This Privacy Notice applies to Argo

### **Changes and updates to this Privacy Notice**

Argo may make changes to this Privacy Notice from time to time by updating this notice

### **Collection of personal data**

Argo, acting as data controller, may collect Personal Data in respect of services as Investment Manager to our funds, from visitors to the Argo website, or from email and other correspondence. The nature of the services you are requesting will determine the kind of Personal Data we might ask for.

Information that you provide to Argo may include Personal Data such as first name, family name, position in the company, company name, company email address, nationality, tax residency, passport, business phone number, business address, country of residence and details of marketing preference information. Argo collects this information:

- to fulfil commercial transactions and contractual obligations with you;
- for the prevention and detection of fraud or money laundering;
- to undertake legal or regulatory reporting or activities;
- to provide you with information or services that you have requested;
- to keep client (or potential client) records up to date;
- to keep you informed about Argo products or services;
- to develop, improve and manage the services and products we can offer you;
- to protect both your and Argo’s interests;
- for the administration and maintenance of databases storing Personal Data;
- to respond to enquiries.

When you visit the Argo website we may collect technical information about the pages that you visit and how you use them, device information, including IP address and device type, and analyse website traffic to generate reports. We do this:

- for ongoing review and improvement of your online experience of the Argo website;
- to prevent any potential disruptions or cyber-attacks;
- to conduct analysis required to detect malicious data;
- in order to comply with and in order to assess compliance with applicable laws, rules and regulations, and internal policies and procedures.

### **How we use your information and legal basis**

When Argo collects Personal Data we make sure that the usage complies with law. The legal basis on which we act may include:



- performance of our contractual obligations with you;
- we have obtained your consent;
- fulfilling our legal and regulatory obligations;
- to establish, exercise or defend our legal rights or for the purpose of legal proceedings; and
- reliance upon a legitimate business interest.

### **Sharing your personal data**

Argo will only share your Personal Data for the purpose(s) for which it was collected. Argo will not sell, distribute or lease your personal information to third parties, unless we have your permission to do so or are required to do so by law.

### **Outside Argo**

We may share your Personal Data outside of Argo with our business partners and with third party agents and contractors such as Argo's accountants, professional advisors, IT and communications providers for the purposes described in this Privacy Notice.

### **Legal and regulatory**

Argo may share your Personal Data to the extent required by law, for example if we are under a duty to disclose your Personal Data in order to comply with any legal obligation (including, without limitation, in order to comply with tax reporting requirements and disclosures to regulators), or to establish, exercise or defend our legal rights.

### **Sharing your personal data outside the EEA**

If Argo 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. This may be done in one of the following ways:

- the country that we send 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 us to otherwise transfer your Personal Data outside Europe.

### **How we safeguard your information**

Argo is committed to ensuring that your information is secure. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard against unauthorised use, access, loss, theft, modification, destruction or disclosure of your information.

### **Links to other websites**

Our website may contain links to other websites of interest. Once you have used these links to leave our site, Argo is no longer responsible for the protection and privacy of any information which you may provide whilst visiting such sites and such sites are not governed by this Privacy Notice.



### **How long we keep your personal data**

How long we will hold your Personal Data for will vary and be determined by the purpose for which it was collected. Argo will keep data for as long as is necessary for that purpose, and for the purpose of fulfilling of our legal and regulatory obligations.

### **Your rights**

You may exercise your rights as a Data Subject over the Personal Data that Argo holds. These rights include:

- the right to obtain information regarding the processing of your Personal Data and access to the Personal Data which we hold about you;
- in certain circumstances, the right to withdraw your consent to the processing of your Personal Data at any time;
- the right to request that we rectify your Personal Data if it is inaccurate or incomplete;
- in certain circumstances, the right to request that we erase your Personal Data;
- the right to object to, or request that we restrict, our processing of your Personal Data;
- the right to lodge a complaint with the relevant data protection regulator if you think that any of your rights have been infringed by us.

Please note that there may be certain circumstances in which Argo may have a legitimate reason to continue to process or retain your Personal Data after it receives a notice that you are withdrawing your consent, or a request from you to erase your Personal Data or to object to or restrict the processing of your Personal Data.

You can exercise these rights by contacting us using the details below.

### **Questions and concerns**

If you have any questions or concerns about Argo's handling of your Personal Data, or about this Privacy Notice, please let us know by contacting our Data Protection Officer either by email at:

[argoinvestorrelations@argocm.com](mailto:argoinvestorrelations@argocm.com)

or in writing to:

The Data Protection Officer, Argo Capital Management Limited, 2<sup>nd</sup> Floor, 24-25 New Bond St, London, W1S 2RR.

All enquiries will be treated confidentially. We are usually able to resolve privacy questions or concerns promptly and effectively, however, if you are not satisfied that we have addressed your concerns, you are entitled to raise this to the applicable privacy regulator. In the UK, this is the Information Commissioner's Office (ICO). You can find the ICO's contact information on its own website at <https://ico.org.uk/global/contact-us/>