



## PARIS CAPITAL ADVISORS (LONDON) LLP

### PRIVACY POLICY

This notice describes the Privacy Policy of Paris Capital Advisors (London) LLP and its associates (the “Firm”) regarding the handling and protection of personal data that is received about prospective, current or former clients and investors.

#### **PERSONAL DATA**

The Firm collects and processes personal data primarily to provide investment management services, communicate information about its products and services and process subscriptions in its private investment vehicles (the “Funds”). Personal data may include name, address, telephone number, social security number or tax identification number, assets, net worth, income, bank account information and occupation (collectively, “Personal Data”).

The Firm permits only authorised individuals, who have been advised as to the proper handling of client data, and who need to access this information to perform services, to have access to this information. These authorised individuals are required to maintain and protect the confidentiality of Personal Data. The Firm maintains physical, electronic and procedural safeguards to protect Personal Data.

#### **PURPOSE AND LEGAL BASIS FOR PROCESSING PERSONAL DATA**

Obtaining and processing Personal Data is permitted by legal grounds rather than consent. The legal basis for such processing is the necessity (i) to comply with the legal and regulatory requirements and obligations imposed on the Firm and its Funds and (ii) to pursue legitimate business interests of the Firm and its Funds.

The legitimate interests for the processing of your personal data by the Firm include legal requirements for compliance with various anti-terrorist and money laundering regulations. As a result, if a client fails to disclose or provide the requisite personal data, the Firm may not be able to process an investors application for shares in the Funds.

Except as described in this Privacy Policy, the Firm will not use Personal Data for any other purpose unless the Firm describes in advance how such Personal Data will be used and you are given an opportunity to decline approval of such use of your Personal Data.

#### **OTHER RECIPIENTS OF PERSONAL DATA**

The Firm may provide Personal Data to service providers that assist the Firm in servicing client accounts and have a need for such information, such as a broker-dealer or administrator. The Firm may also disclose Personal Data to regulatory authorities as required or permitted by applicable law. This may involve the transfer of personal data to countries outside of the UK which may not have the same data protection laws.

The Firm does not otherwise provide information about you to outside firms, organisations or individuals except at your request or to our attorneys, accountants and auditors and as permitted by law. Any contract

entered into by the Firm will include provisions designed to ensure that the service provider will uphold and maintain the Firm's privacy standards when handling Personal Data.

#### **RETENTION OF PERSONAL DATA**

The Firm will continue to adhere to this Privacy Policy with respect to the information we have in our possession relating to both existing and former clients. The personal data will be stored for the duration that the Firm has an obligation to provide services to a client and for any applicable regulatory retention period prescribed by law or regulation.

#### **RIGHTS IN RELATION TO PERSONAL DATA**

Clients have the right to obtain access to, rectification or erasure of Personal Data, restriction of processing, object to processing or data portability by making a request to the Firm in writing at the contact details below.

Clients have the right to file a complaint with the UK Information Commissioner's Office or other supervisory authority with responsibility for supervision of the data held by the Firm or its Funds.

The Firm may send marketing information to clients where it has an existing relationship with them and where they have made a request to receive information about the Firm and its Funds. If you receive information from the Firm and no longer wish to, please let us know by email to [Marketing@parisca.com](mailto:Marketing@parisca.com) or at the contact details below.

#### **CONTACT**

If you have any questions or concerns about this notice or our management of Personal Data, you should contact the Compliance Officer at the Firm:

Iain Collett

Paris Capital Advisors (London) LLP

25 Cresswell Place, London, SW10 9RB.