

**WRM Capital Asset Management S.à r.l.**  
**WRM CapInvest Ltd**

**Data Privacy Notice**

**Introduction**

On 25 May 2018, enhanced legislation, known as the General Data Protection Regulation (“GDPR”) came into effect. The two key purposes of GDPR are:

- To set guidelines for the collection, processing and protection of personal data.
- To give individuals certain rights in relation to their personal data (such as access, rectification and withdrawal).

Personal data is any information that directly or indirectly enables an individual to be identified such as the name or the location data.

The aim of GDPR is to make the processing of personal information and data more transparent, enhancing personal rights and giving greater control over how and what personal information is handled.

For the purposes of GDPR and any associated local laws, WRM Capital Asset Management S.à r.l. (“WRM CAM”) incorporated under the Laws of Luxembourg with the LBR number B167.349 and with registered office at 9, rue Ste Zithe L-2763, Luxembourg is the data controller for Luxembourg;

WRM CapInvest Ltd (“WRM CapInvest”) incorporated under the Laws of the United Kingdom with Company House number 07990219 and with registered office at 51 Berkeley Square, London, W1J 5BB is the data controller for the UK and its branch WRM Services S.r.l. in Milan.

Collectively referred as the “WRM Group Companies”.

**Collecting your personal data**

The personal data we collect from you will be relevant only to the purposes we have discussed and agreed with you in connection with your business dealing with the WRM Group Companies and is limited only to those purposes. We collect personal data about you from different places:

- directly from you,
- from someone acting on your behalf,
- from publicly available sources or third parties.

Bodies or Individuals we may receive personal data from include:

- Your professional advisers such as your Lawyers or Accountants,
- Organisations that introduce you to us,
- Credit reference agencies,
- Fraud prevention agencies,
- Government and law enforcement agencies,
- Public information sources such as Companies House,

- Agents working on our behalf,
- Companies you work for or hold shares in.

## **Data Processing**

Processing means any operation performed on personal data such as recording, storage or erasure.

The principal purpose of processing your information is:

- To contact you in order to carry out the services mutually agreed upon or to take necessary steps to enable us to enter into a contractual agreement with you,
- To enable us to introduce you to third parties providing investment opportunities and ancillary services such as fund managers and custodians,
- To ensure compliance with legal and regulatory obligations including but not limited to Anti-Money Laundering Legislation and Anti-Bribery Legislation,
- To ensure compliance with reporting requirements and automatic exchange of information e.g. FATCA and CRS.

We may collect, use and share certain categories of your personal data which includes, but is not limited to, your:

- Name, date of birth, address and contact details,
- Nationality and identity number(s),
- Identification documentation e.g. passport, driving licence,
- Employment details, income and other financial details,
- Bank account details.

## **Lawful basis for processing**

Data protection legislation sets out a number of different reasons for collecting and processing your data including

- Consent – In specific situations we may collect and process your data with your consent. In most circumstances we will use another basis (as detailed below) to process your data. If however these bases are not available we will seek your consent.
- Contractual Obligations – We may need your details to comply with our contractual obligations. We may also use this basis prior to entering into a contract, if the objective is to enter into a contract.
- Legitimate Interests – In specific situations we may need your data to pursue our legitimate business interests in a way which might reasonably be expected as part of running our business.
- Legal Obligations – We may use your data in order for us to comply with our common law, statutory or regulatory obligations. Examples may include collecting data to comply with the Anti-Money Laundering Regulations.

## **Protecting your data**

We fully understand and appreciate the importance of client privacy and we also fully understand our legal duty to keep client contact information confidential and this forms part of our agreement with you. We give you our assurance that personal data held by us will be kept confidential in accordance with applicable policies and procedures.

We are required by regulation to record telephone conversations when certain activities are being conducted. The records are kept for a period of 5 years. Other telephone calls are recorded and will not generally be kept for a period of more than one month.

We will only retain your personal data for as long as necessary to fulfill the purposes we collected it for. Personal data will not generally be held for more than seven years after the end of the relationship unless we are legally obliged to retain it for longer.

Some of the information held may be transferred to, stored and processed by third parties. These third parties may or may not be located within the EEA. We will take the necessary steps to ensure your personal data is protected in accordance with applicable laws and will treat the information under the guiding principles of this notice.

We train our employees on both data protection regulation and our own internal policies and procedures to ensure all our employees are aware of these requirements. Regular monitoring takes place to ensure our policies and procedures are being updated and adhered to.

### **Sharing your personal data**

We may disclose your personal data to other members of the WRM group, our agents, brokers and connected parties, and other third parties that enable us to provide the services to which you are engaged.

We may also share your personal information with the following (but not limited to):

- Your professional advisers such as your Lawyers or Accountants,
- Investment vehicles in which you or a connected party/company are looking to invest in,
- Credit reference agencies,
- Fraud prevention agencies,
- Government and law enforcement agencies,
- Public information sources such as business registers,
- Companies you work for or hold shares in.

In all cases there will be a legal basis as detailed above under 'Legal basis for processing'.

In certain circumstances we may need to share information to companies outside of the EEA. Where this is necessary we will ensure this is done in accordance with current data protection legislation by only transferring information to jurisdictions to which there is equivalent protection.

### **Your data protection rights**

Under the data protection legislation you have a number of rights in relation to the data we hold about you. You have the following rights, including but not limited to:

- Access – You have the right to request details of the information we hold about you.
- Rectification – You have the right to restrict the processing of information if any of the information is inaccurate.
- Erasure – You have the right to request that we delete your personal information if you believe we no longer need the information, you have withdrawn your consent or we are not using it in a lawful manner.

- Restricting processing - You have the right to request we restrict the processing of your personal information if you believe we no longer need to process the information, you have withdrawn your consent or we are not using it in a lawful manner.
- Complaint – you have the right to raise a complaint on how we have handled your personal information. If the matter cannot be resolved, you can contact:
  - For the United Kingdom, the Information Commissioner’s Office (ICO) at <https://ico.org.uk/make-a-complaint/> or by telephone on +44 0303 123 1113
  - For Luxembourg, the *Commission Nationale pour la Protection des Données* (CNPD) at <https://cnpd.public.lu/en/particuliers/faire-valoir.html> or (+352) 26 10 601.

## **How to contact us**

Please contact us at the following address:

The Compliance Officer, WRM Capital Asset Management S.à r.l., 9 rue Ste Zithe, L-2763 Luxembourg, [info@wrmgrou.net](mailto:info@wrmgrou.net), or The Compliance Officer, WRM CapInvest Ltd, 51 Berkeley Square, London W1J 5BB if you have any questions about our Privacy Policy.