

PRIVACY POLICY

Odey Asset Management LLP, Odey Wealth Management (UK) Limited, Odey Wealth Management (C.I.) Limited, Odey Asset Management Group Limited and the funds and accounts managed by us (“Odey”) each act as a data controller and/or data processor in respect of your Personal Data for the purposes of the European Union’s General Data Protection Regulation (including as applicable in the United Kingdom, where it is supplemented by the Data Protection Act, 2018) and, where relevant, the Cayman Islands’ Data Protection Act, (Revised) (“Data Protection Law”). Odey is responsible for ensuring that it uses your Personal Data in compliance with Data Protection Law.

All service providers appointed by Odey to process Personal Data (“Data Processors”) will process Personal Data provided in accordance with Odey’s instructions and Odey will act as the Data Controller of any such Personal Data.

This Privacy Notice applies to you if:

- you are an investor in any of Odey’s funds;
- you are a client or potential client of ours;
- you have requested to receive any marketing material from us; and/or
- you have given your Personal Data to Odey for any other purpose.
- This Privacy Notice sets out the basis on which Personal Data about you will be processed by us.

Personal Data that can be used

The term “Personal Data” under Data Protection Law is defined as:

“any information relating to an identified or identifiable natural person ('Data Subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person”.

We might process the following Personal Data about you:

- Information provided by you: this might include your name and address (including proofs of name and address and email address), contact details, date of birth, gender, nationality, photograph, signature, occupational history, job title, income, assets, other financial information, bank details, investment history, tax residency and tax identification information. Such information might be provided in an application form or in other documents (as part of an application process or at other times), face-to-face, by telephone, by email or otherwise.
- Information that we collect or generate: this might include information relating to your investment in an Odey fund or an account with us, emails, call recordings and website usage data.

- Information that we obtain from other sources: This might include information obtained for the purpose of know-your-client procedures (which include anti-money laundering procedures, counter-terrorist financing procedures, politically-exposed-person checks, sanctions checks, among other things), information from public websites, credit reference agencies, data providers and other public sources and information received from any of your advisers or intermediaries.

Uses of your Personal Data

Your personal data may be stored and processed by us for the following purposes:

- Assessing and processing applications for shares in Odey funds and other share dealings including performing know-your-client procedures, issuing and redeeming shares, receiving payments from and making payments to the applicant, calculating net asset value, and overseeing these processes.
- Assessing and processing client applications including performing know-your-client procedures, receiving payments from and making payments to you, calculating valuations and overseeing these client processes.
- General business administration, including communicating with you, communicating with service providers on your behalf where necessary and any counterparties, communicating with other fund managers in connection with a transfer of your investment to a fund to be managed by a third party manager, accountancy and audit services, risk monitoring and administration of IT systems.
- Compliance with legal and regulatory obligations and industry standards, including know-your-client procedures, the automatic exchange of tax information and legal judgments.
- Providing Odey marketing and investment material as requested.

We are entitled to process your Personal Data in these ways for the following reasons:

- If you are an investor in an Odey fund, you have or will enter into an investment contract with the relevant fund and some processing will be necessary for the performance of that contract or will be done at your request prior to entering into that contract.
- Processing may be necessary to discharge a relevant legal or regulatory obligation.
- The processing will, in all cases, be necessary for Odey's legitimate business interests such as:
- carrying out Odey's business activities, including investment services and direct marketing and the possible transfer of your investments from funds managed by Odey to funds managed by third parties;
- ensuring compliance with all legal and regulatory obligations and industry standards, and preventing fraud;
- establishing, exercising or defending legal rights or for other purposes relating to legal proceedings; and
- ensuring the security of information systems.
- In respect of any processing of sensitive Personal Data falling within special categories, such as any Personal Data relating to political opinions of a politically exposed person, the processing will be necessary for reasons of substantial public interest.

Disclosure of your Personal Data to third parties

We may from time to time, in accordance with the purposes described above, disclose your Personal Data to other parties, including our funds' administrators and their affiliates, professional advisers such as law firms and accountancy firms, other service providers, including technology service providers, counterparties, other fund managers in connection with a transfer of your investment to a fund to be managed by a third party manager and courts and regulatory, tax and governmental authorities. These entities will process your Personal Data in accordance with our instructions and will themselves be responsible for their use of your Personal Data under Data Protection Law.

Transfers of your Personal Data outside the European Economic Area, the United Kingdom or the Cayman Islands

Your Personal Data may be transferred to and stored by entities outside the European Economic Area (the "EEA") the United Kingdom ("UK") or the Cayman Islands, such as service providers to Odey or fund administrators.

Where Personal Data is transferred outside the EEA, the UK or the Cayman Islands, we will ensure that the transfer is subject to appropriate safeguards or is otherwise permitted under applicable law. For example, the country to which the Personal Data is transferred may be approved by the European Commission, the recipient may have agreed to model contractual clauses approved by the European Commission that oblige them to protect the Personal Data,.

You can obtain more details of the protection given to your Personal Data if it is transferred outside the EEA, the UK or the Cayman Islands, including a copy of any standard data protection clauses entered into with recipients of your Personal Data, by contacting us using the details set out below.

Necessity of Personal Data for an investment in an Odey Fund

The provision of certain Personal Data is necessary for shares in an Odey fund to be issued to any applicant and for compliance by the fund and its service providers with certain legal and regulatory obligations. Accordingly, if certain Personal Data is not provided when requested or withdrawn, an application for shares might not be accepted or shares might be compulsorily redeemed.

Retention of Personal Data

How long we hold your Personal Data for will vary. The retention period will be determined by various criteria, including the purposes for which we are using it (as it will need to be kept for as long as is necessary for any of those purposes) and legal obligations (as laws or regulations may set a minimum period for which we have to keep your Personal Data).

Your rights

You have a number of legal rights in relation to the Personal Data that we hold about you. These rights include the following:

- The right to obtain information regarding the processing of your Personal Data and access to the Personal Data that we hold about you.
- In some circumstances, the right to receive some Personal Data in a structured, commonly used and machine-readable format and the right to request that we transmit that data to a third party where this is technically feasible. Please note that this right only applies to Personal Data which you have provided to a Odey fund.
- The right to request that we rectify your Personal Data if it is inaccurate or incomplete.
- The right to request that we remove or erase your Personal Data in certain circumstances. Please note that there may be circumstances where you ask us to remove or erase your Personal Data but we may still be legally required to retain it.
- The right to object to, and the right to request that we restrict our processing of your Personal Data in certain circumstances. Again, there may be circumstances where you object to, or ask us to restrict our processing of your Personal Data but we will remain legally required to continue processing your Personal Data or may even have to refuse that request.
- The right to lodge a complaint with the data protection regulator (details of which are provided below) if you think that any of your rights have been infringed by us.

You can exercise your rights by contacting us using the details set out under "Contacting Us" below. You can find out more information about your rights by contacting an EU data regulator such as the UK's Information Commissioner's Office, or by searching their website at ico.org.uk.

Cookies

Odey uses cookies: a "cookie" is a small file placed on your device to allow us to recognise and remember your browser. We can use several types: session cookies to help you navigate to the appropriate part of Odey's website for the jurisdiction in which you are located - these are temporary and will be removed at the end of your session; persistent cookies if you click on "remember me" to enable you to customise your use of the website - this will be stored on your computer's hard drive until automatic expiry after 30 days or until you delete it; persistent cookies to collect non-personal data for analytic reports and advertising to track your use of the Odey website – this is stored on your computer's hard drive until they expire or until you delete them; advertising cookies so we can understand what sort of pages you are interested in and display advertising on your browser to promote Odey's products and services based on these interests and show you advertising based on your browsing patterns and interactions on Odey's and other third-party websites. We may share online non-personal data collected through cookies with our advertising partners. By clicking on the acceptance box you hereby give your consent to Odey using these cookies.

Contacting Us

If you would like further information on the collection, use, disclosure, transfer or processing of your Personal Data or the exercise by us of any of the rights listed above, please address questions and requests to: privacy@odey.com or call us on 020 7208 1400.

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