

STATEMENT ON PERSONAL AND SENSITIVE DATA

The purpose of this document is to set out our approach to protecting and preserving personal data, and the prevention of its loss.

The document sets out two broad focus areas:

1. Under the EU and UK General Data Protection Regulations (“GDPR”), we are required to update our data protection guidelines, in the case of individual clients, provide certain details regarding the Stafford’s approach to the collection and use of personal data; and
2. In relation to information we collect from our Website (“Site”), the practices we follow to respect the privacy of all visitors.

Information we obtain

The types of information we collect on our Site includes:

- Personal and business contact information (such as name, postal and email address, and telephone number); and
- other personal information you submit to us, such as information you provide to register for email alerts.

In connection with our Careers’ pages or Investor Portal, you may provide Personally Identifiable Information (“PII”)¹. We will not consider either this information or your choice to decline to provide it in evaluating your qualifications for employment with us. This information will be used only legal and compliance purposes.

PART 1: ASPECTS RELATED TO PERSONAL DATA

The Stafford Capital Partners group is a group of regulated entities, all of which are separate legal entities (more information can be found here www.staffordcp.com/legal).

The registered office of Stafford Capital Partners Limited is 11th Floor, 200 Aldersgate Street, London, EC1A 4HD, United Kingdom. Our Data Protection Officer (“DPO”) can be contacted at privacy@staffordcp.com.

What are your rights?

If at any point you believe the information we process on you is incorrect you can request to see this information and even have it corrected or deleted. If you wish to raise a complaint on how we have handled your personal data, you can contact our DPO who will investigate the matter. If you are not satisfied with our response or believe we are not processing your PII in accordance with the law, you can contact the UK’s Information Commissioner’s Office (“ICO”) via its website.

Unless otherwise agreed with you, we will only collect legally permitted personal data about you. This information does, however, include your name, work address, email address and job title.

Under EU and UK GDPR, your rights are:

1. the right to be informed;
2. the right of access;

¹ PII may include, but is not limited to, login credentials; information regarding your work authorization status, education history, employment history and professional designations; other information about your qualifications; your political contributions for the last two years for legal and compliance purposes; your gender, race, /ethnicity, and your veteran and disability status, where legally permissible.

3. the right to rectification;
4. the right to erasure;
5. the right to restrict processing;
6. the right to data portability;
7. the right to object; and
8. the right not to be subject to automated decision-making including profiling.

Why do we collect personal data?

We need to process personal data to provide you with our services, as part of our terms of business. If you do not provide this information, then, we may not be able to provide the services you have requested. We will only collect personal data that is required by us to provide and oversee the agreed services to you.

Why do we hold personal data?

All the personal data we hold about you will be processed by our staff and no third parties will have access to your personal data unless there is a legal obligation, particularly as a necessary consequence of the services we have provide to you, for us to provide them with this.²

Our uses can be broken down into mainly three types:

1. Processing that is necessary for compliance with a legal obligation;
2. Retaining data if it is necessary for the performance of a contract with you, or to take steps to enter into a contract; and
3. Communicating other services we can offer you and update you about our activities.

We take all reasonable steps to ensure that your personal data is processed and retained securely.

How long do we retain personal data?

We will generally keep your personal data for a minimum of 6 years, after which time it will be destroyed if it is no longer required for the lawful purpose(s) for which it was obtained. If you consent to marketing, any information we use for this purpose will be sorted with us until you notify us that you no longer wish to receive this information.

Why do we share your personal data?

Your personal data will only be shared with third parties including other data controllers where it is necessary for the performance of the data controllers' tasks or where you first give us your prior consent. It is likely that we will need to share your data with:

- Other group members in Stafford Capital Partners group (each will be a separate legal entity and will be responsible to you as a data controller); and
- Our agents, suppliers and contractors and other third parties.

Any personal data transferred to countries or territories outside the European Union will only be placed on systems complying with measures giving equivalent protection of personal rights either through international agreements or contracts approved by the European Union.

We do not authorize these service providers to use or disclose the information except as necessary to perform services on our behalf or comply with legal requirements.

We also may disclose information about you

² Examples of your personal data usage may include, but is not limited to, providing products and services to you; managing your investments; verifying your information; performing data analyses and comply with and enforce applicable legal requirements, relevant industry standards and our policies, including our terms and conditions of use (www.staffordcp.com/legal).

- (i) if we are required to do so by law or legal process, to law enforcement authorities or
- (ii) other government entities based on a lawful disclosure request, or
- (iii) when we believe disclosure is necessary or appropriate to prevent harm or financial loss, or in connection with an investigation of suspected or actual fraudulent or illegal activity. We reserve the right to transfer personal information we have about you in the event we sell or transfer all or a portion of our business or assets (including in the event of a reorganization, spin-off, dissolution or liquidation).

Part 2: ASPECTS RELATED TO THIS SITE

Why do we collect personal data?

We collect PII and User Data that is provided by visitors to this Site. The User Data that Stafford receives from Site visitors includes name, title, address, email address, screen name, telephone and fax numbers, and any other information provided by visitors in email messages or attachments thereto.

We aim to limit information collected to only the minimum information required to complete a Site visitor's request.

Our intention is not to seek any sensitive information through our Site unless legally required for recruiting purposes. Sensitive information includes several types of data relating to race or ethnic origin, political opinions, religious or other similar beliefs, trade union membership, physical or mental health, sexual life, or criminal record.

How do we use personal data ?

User Data obtained by the Site is used for internal business purposes and in connection with a visitor's request. This data is not shared with others for unrelated purposes unless stated in this statement on personal data and sensitivity or otherwise communicated to the Site visitor.

We make every practical effort to avoid excessive or irrelevant collection of data. If a visitor believes the Site has collected excessive information, we encourage the visitor to contact us at privacy@staffordcp.com to raise any concerns.

Under which circumstances would we share your personal data provided through the website or otherwise?

We may disclose User Data to third parties under the following circumstances:

- when explicitly requested by the visitor;
- when required to deliver publications or reference materials requested by the visitor;
- when required to facilitate conferences or events hosted by a Stafford; and
- when required to meet any other request from a visitor.

Categories of third parties that we may share personal information with include federal, state, and local government entities and other members of the Stafford Capital Partners group. This Site does not collect or compile personally identifying information (PII) for dissemination or sale to outside parties for consumer marketing purposes, or host mailings on behalf of third parties.

How do we deal with cookies?

A cookie is an element of data that a website can send to a visitor's computer browser so that this computer will be recognised by the site on their return. Cookies allow our web server to recognise a computer on connection to the Site, which in turn allows the server to make downloading of pages faster than on first viewing. In addition, cookies may also be used by us to establish statistics about the use of the Site by Internet users by gathering and analysing data such as: most visited pages, time spent by users on each page, site performance, etc. By collecting and using such data, we hope to improve the quality of the Site.

The data collected by our servers and/or through cookies that may be placed on your computer will not be kept for longer than is necessary to fulfil the purposes mentioned above. In any event, such information may not be kept for longer than one year.

Navigation data about site viewers is automatically collected by our servers. If you do not wish to have this navigation data collected, we recommend that you do not use the Site. A visitor can also set their browser to block the recording of cookies on their hard drive to minimise the amount of data that may be collected about your navigating on the Site. The browser on a computer can be set to notify the user when a cookie is being recorded on their computer's hard drive. Most browsers can also be set to keep cookies from being recorded on their computer. However, for optimal use of the Site, we recommend that visitors do not block the recording of cookies on their computer.

All our servers and computer systems are protected to mitigate the risk of cyber-attacks. As a result, all data that may be collected about Site viewers using cookies will be protected from unauthorised access³. Cookies used on the Site are only active for the duration of the visit. Cookies used on this site are not stored on visitor's computer once you have closed your web browser. Information generated using cookies may be compiled into an aggregate form so that no individual can be identified.

We may at some stage use cookies to identify users when they visit the Site to use personalised services. In such circumstances these cookies may be kept on the hard drive of their computer following closure of the web browser. Cookies used in connection with such services enable us to build up a profile of our users and to develop personalised versions of the Site.

For more information about cookies, please see the UK's ICO website home page or the Interactive Advertising Bureau.

A visitor may choose to not receive a cookie file by enabling your web browser to refuse cookies. The procedure for refusal of cookies may vary for different software products. Please check with your internet browser software help or your software supplier if you wish to refuse cookies.

Why do we transfer personal data acquired?

The Internet is a global environment. To provide the Site, we may need to transfer User Data to locations outside the jurisdiction in which a visitor is viewing the Site (the User Jurisdiction) and process User Data outside the User Jurisdiction. Any data sent or uploaded by users may be accessible in jurisdictions outside the User Jurisdiction (including outside the EEA). The level of data protection offered in such jurisdictions may be less than that offered within the User Jurisdiction.

User Data may be controlled and processed by any of Stafford Capital Partners group's offices, some of which are outside the EEA, any one or more of which may act as controllers of and/or process personal information of visitors. By using the Site, visitors are consenting to such transfers, in accordance with the purposes set out above and elsewhere in the Legal and Regulatory parts to the Site. Please do not send us any personal data if you do not consent to the transfer of this information to locations outside the User Jurisdiction.

Your choices

Visitors are not required to register to gain access to this Site. Personal data provided to us through this Site is given by consent from visitors.

If you have consented to receiving any communications from us (e.g. in form of press releases, newsletters, "Stafford Diaries", research papers, or similar informative communications), then you may choose to unsubscribe from those by emailing privacy@staffordcp.com.

³ Contact the DPO for further information about the technology protects in place to prevent unauthorised access.

Your access

Each visitor has the right of access to their personal data that they have submitted through this Site. User updates of information will be handled by forwarding enquiries to privacy@staffordcp.com.

Security

All Stafford Capital Partners employees and Partners are instructed to follow the firm-wide cybersecurity policy and Personal & Sensitive Data policy. Only authorised personnel are provided access to PII. These employees are bound by confidentiality.

Updates

We reserve the right to modify or amend this statement at any time. The effective date will be displayed at the beginning of this statement. To keep visitors informed, we will notify users of material changes to our Personal and Sensitive Data statement, by prominently identifying a link on our website home page to the updated Privacy Policy for a period of not less than two weeks.

Links to other websites

Our Site may provide links to other websites. These websites may operate independently from us. Linked websites may have their own privacy notices or policies, which we suggest you review. To the extent any linked websites are not owned or controlled by us, we are not responsible for their content, any use of the websites, or the privacy practices of the websites.

Consent

By using the Site, visitors are consenting to our use of your personal data as set out in this Privacy Policy. You can withdraw your consent at anytime; however, this may limit your access to the Site and our services.

Our other obligations

We have obligations in other jurisdictions, such as in Australia, under the Australian Privacy Principles and in the USA, under state data privacy laws, where we operate financial services businesses or act as a registered investment advisor respectively. If you would like to be informed about our approach to those jurisdictions, then you should email privacy@staffordcp.com.

Appendix 1

Data	Acquired through	Form	SCP and Processor Repositories	Approved Use	Processor
Investor Name	Subscription or Application Form	<ul style="list-style-type: none"> • Electronic • Physical 	<ul style="list-style-type: none"> • Cloud File Management Systems • Email archives • CRM system • Accounting Systems • Banking Systems • Administrator document Portal 	Beneficiary in a fund managed by Stafford or affiliate of Stafford	<ul style="list-style-type: none"> • Fund Operations • Third Party Administrator • Custodian • Tax Compliance Provider • Auditor
Investor Address	Subscription or Application Form	<ul style="list-style-type: none"> • Electronic • Physical 	<ul style="list-style-type: none"> • Cloud File Management Systems • Email archives • CRM system • Accounting Systems • Banking Systems • Administrator document Portal 	Beneficiary in a fund managed by Stafford or affiliate of Stafford	<ul style="list-style-type: none"> • Fund Operations • Third Party Administrator • Custodian • Tax Compliance Provider • Auditor
Investor Contacts	Subscription or Application Form	<ul style="list-style-type: none"> • Electronic • Physical 	<ul style="list-style-type: none"> • Cloud File Management Systems • Email archives • CRM system • Accounting Systems • Administrator document Portal 	Beneficiary in a fund managed by Stafford or affiliate of Stafford	<ul style="list-style-type: none"> • Fund Operations • Third Party Administrator • Custodian • Tax Compliance Provider • Auditor

Data	Acquired through	Form	SCP and Processor Repositories	Approved Use	Processor
Investor Contact email, phone, address	Subscription or Application Form	<ul style="list-style-type: none"> • Electronic • Physical 	<ul style="list-style-type: none"> • Cloud File Management Systems • Email archives • CRM system • Accounting Systems • Banking Systems • Administrator document Portal 	Beneficiary in a fund managed by Stafford or affiliate of Stafford	<ul style="list-style-type: none"> • Fund Operations • Third Party Administrator • Custodian • Tax Compliance Provider • Auditor
Investor Tax identification	Subscription or Application Form	<ul style="list-style-type: none"> • Electronic • Physical 	<ul style="list-style-type: none"> • Cloud File Management Systems • Email archives • CRM system • Accounting Systems • Administrator document portals 	Beneficiary in a fund managed by Stafford or affiliate of Stafford	<ul style="list-style-type: none"> • Fund Operations • Third Party Administrator • Custodian • Tax Compliance Provider • Auditor
Investor proofs of identity	<p>Ancillary requirements for preventing money-laundering or terrorism funding</p> <p>Subscription or Application Form</p>	<ul style="list-style-type: none"> • Electronic • Physical 	<ul style="list-style-type: none"> • Cloud File Management Systems • Email archives • CRM system • Administrator document portals 	Beneficiary in a fund managed by Stafford or affiliate of Stafford	<ul style="list-style-type: none"> • Fund Operations • Third Party Administrator • Custodian • Tax Compliance Provider • Auditor

Data	Acquired through	Form	SCP and Processor Repositories	Approved Use	Processor
Investor contacts' proofs of identity	Ancillary requirements for preventing money-laundering or terrorism funding Subscription or Application Form	<ul style="list-style-type: none"> • Electronic • Physical 	<ul style="list-style-type: none"> • Cloud File Management Systems • Email archives • Administrator document portals 	Beneficiary in a fund managed by Stafford or affiliate of Stafford	<ul style="list-style-type: none"> • Fund Operations • Third Party Administrator • Custodian • Tax Compliance Provider • Auditor
Investor proofs of source of wealth	Ancillary requirements for preventing money-laundering or terrorism funding Subscription or Application Form	<ul style="list-style-type: none"> • Electronic • Physical 	<ul style="list-style-type: none"> • Cloud File Management Systems • Email archives • Administrator document portals 	Beneficiary in a fund managed by Stafford or affiliate of Stafford	<ul style="list-style-type: none"> • Fund Operations • Third Party Administrator • Custodian • Tax Compliance Provider • Auditor
Investor proofs of tax domicile	Ancillary requirements for Automatic Exchange of Information (FATCA, CRS). Ancillary requirements for tax compliance (W8, W8-Ben-E, W9, or similar) Subscription or Application Form	<ul style="list-style-type: none"> • Electronic • Physical 	<ul style="list-style-type: none"> • Cloud File Management Systems • Email archives • CRM system • Accounting Systems • Administrator document portals 	Beneficiary in a fund managed by Stafford or affiliate of Stafford	<ul style="list-style-type: none"> • Fund Operations • Third Party Administrator • Custodian • Tax Compliance Provider • Auditor

Data	Acquired through	Form	SCP and Processor Repositories	Approved Use	Processor
Investor bank accounts	Subscription or Application Form	<ul style="list-style-type: none"> • Electronic • Physical 	<ul style="list-style-type: none"> • Cloud File Management Systems • Email archives • CRM system • Accounting Systems • Banking Systems • Administrator document portals 	Beneficiary in a fund managed by Stafford or affiliate of Stafford	<ul style="list-style-type: none"> • Fund Operations • Third Party Administrator • Custodian • Tax Compliance Provider • Auditor
Investor contacts relationships to others	By data inference from existing coincidental information to other funds investments, other investors, other investor contacts	<ul style="list-style-type: none"> • Electronic • Physical 	<ul style="list-style-type: none"> • CRM system • Other mailing list repository • Portfolio management systems 	Beneficiary in a fund managed by Stafford or affiliate of Stafford	<ul style="list-style-type: none"> • Fund Operations • Third Party Administrator
Investor holdings	Subscription or Application Form	<ul style="list-style-type: none"> • Electronic • Physical 	<ul style="list-style-type: none"> • Portfolio management systems • Email archives • Accounting Systems • Administrator document portals 	Beneficiary in a fund managed by Stafford or affiliate of Stafford	<ul style="list-style-type: none"> • Investment Team • Fund Operations • Third Party Administrator • Custodian • Tax Compliance Provider • Auditor

Data	Acquired through	Form	SCP and Processor Repositories	Approved Use	Processor
Third party investment managers contact information	<p>Authorised investments through Investment Committee decisions</p> <p>Notices from Third Party Managers</p>	<ul style="list-style-type: none"> • Electronic • Physical 	<ul style="list-style-type: none"> • Cloud File Management Systems • CRM system • Email archives 	Investment of Stafford fund or a portfolio investment that Safford Capital Partners is authorised to monitor	<ul style="list-style-type: none"> • Investment Team • Fund Operations • Third Party Administrator • Custodian • Tax Compliance Provider • Auditor
Tax identification of Third party fund investments	<p>Authorised investments through Investment Committee decisions</p> <p>Notices from Third Party Managers</p>	<ul style="list-style-type: none"> • Electronic • Physical 	<ul style="list-style-type: none"> • Cloud File Management Systems • CRM system • Email archives • Administrator document portals 	Investment of Stafford fund or a portfolio investment that Safford Capital Partners is authorised to monitor	<ul style="list-style-type: none"> • Investment Team • Fund Operations • Third Party Administrator • Custodian • Tax Compliance Provider • Auditor
Employee Name, Address, Tax file identification, email and phone details	Employment with Stafford	<ul style="list-style-type: none"> • Electronic • Physical 	<ul style="list-style-type: none"> • Cloud File Management Systems • CRM system • Email archives • Banking systems • Accounting System • Payroll systems • Human resources performance gathering tools • Portals (pensions, pay, performance) 	Employee of Stafford	<ul style="list-style-type: none"> • Human Resources • Third party payroll providers