

23rd May 2018

This Privacy and Cookies Policy (**Privacy and Cookies Policy**), together with our website terms of use (**Terms of Use Policy**) and any other documents referred to in it, set out the basis on which any personal data Alcazar Investment Management Limited (Alcazar Investment Management Limited, **us, we** or **our**) collects from you, or that you provide to us, will be processed by us. Alcazar Investment Management Limited is committed to ensuring that your privacy is protected, so please read this Privacy and Cookies Policy carefully to understand our views and practices regarding your personal data and how we will treat it.

For the purposes of the Data Protection Act 1998 (the **Act**), the data controller is Dr Joaquin Garces Narro of Alcazar Investment Management Limited.

1 WHAT TYPE OF INFORMATION DO WE COLLECT FROM YOU?

- 1.1 We may collect and process the following information from you:
 - 1.1.1 if you contact us, we may keep a record of that correspondence; and
 - 1.1.2 details of your visits to our Website and the resources that you access.

2 WHAT IS OUR LAWFUL BASIS FOR PROCESSING YOUR PERSONAL DATA?

- 2.1 Our lawful basis for processing activity in the GDPR is “legitimate interest basis”.
 - 2.1.1 We contact professional counterparties in our trade sector to offer them our services;
 - 2.1.2 We source professional counterparty contact information from website searches but also from private meetings and networking because we have a commercial legitimate interest to market our services to them.

3 HOW DO WE USE YOUR PERSONAL DATA?

- 3.1 We use information held about you in the following ways:
 - 3.1.1 to carry out our obligations arising from any contracts entered into between you and us;
 - 3.1.2 to provide you with information, products or services that you request from us or which we feel may interest you, where you have consented to be contacted for such purposes;
 - 3.1.3 to ensure that content from our Website is presented in the most effective manner for you and for your computer; and
 - 3.1.4 to notify you about changes to our service.
- 3.2 We may also use your data, or permit selected third parties to use your data, to provide you with information about goods and services which may be of interest to you and we or they may contact you about these.

- 3.3 If you do not want us to use your data in this way, or to pass your details on to third parties for marketing purposes, please tick the relevant box situated on the form on which we collect your data.

4 DISCLOSURE OF INFORMATION

- 4.1 We may disclose your personal information to any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 1159 of the United Kingdom Companies Act 2006.

- 4.2 We may disclose your personal information to:

- 4.2.1 our affiliates or professional advisers;
- 4.2.2 persons or organisations who work on our behalf to provide a product or a service to you;
- 4.2.3 companies which perform marketing services on our behalf or with whom we have joint marketing agreements;
- 4.2.4 other companies who we believe may have products and services of interest to you.

- 4.3 We may also disclose your personal information to third parties if:

- 4.3.1 we sell or buy any business assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets;
- 4.3.2 Alcazar Investment Management Limited or substantially all of its assets are acquired by a third party, in which case personal data held by us about our customers will be one of the transferred assets;
- 4.3.3 we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms of use and other agreements, or to protect the rights, property or safety of Alcazar Investment Management Limited, our customers or others, including exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

5 HOW WE PROTECT YOUR DATA

- 5.1 The data that we collect from you may be transferred to and stored at a destination outside the European Economic Area (EEA). It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. Such staff may be engaged in, among other things, the fulfilment of contracts, the processing of details or the provision of support services. By submitting your personal data you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy and Cookies Policy.

- 5.2 Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our Website. Any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.
- 5.3 We take all reasonable care to ensure the security of the website and of your personal information from access by unauthorised persons and against unlawful processing, accidental loss, destruction and damage. We will not share your information other than as provided for in this Privacy and Cookies Policy or as required by law, court order or other government or law enforcement authorities.

6 IP ADDRESSES AND COOKIES

- 6.1 We may collect information about your computer, including where available your IP address, operating system and browser type, for system administration purposes.
- 6.2 Cookies contain information that is transferred to your computer's hard drive. Cookies allow a web application to tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences.
- 6.3 This statistical data does not identify an individual. We only use this information:
- 6.3.1 to gather information on IP addresses and pages visited;
 - 6.3.2 to analyse trends;
 - 6.3.3 to administer the website;
 - 6.3.4 to track users' movements on the website; and
 - 6.3.5 for purposes of statistical analysis.
- 6.4 You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of our Website. Unless you have adjusted your browser settings so that it will refuse cookies, our system will issue cookies when you log on to our Website.

7 LINKS TO OTHER WEBSITES

- 7.1 This Privacy and Cookies Policy may be reviewed and enhanced from time to time. The up-to-date version of our Privacy and Cookies Policy is always available by applying in writing and extends only to our Website and does not cover your use of, provision of data to and collection of data on any other website.
- 7.2 Our Website may from time to time contain links to and from other websites. If you follow a link to any of these websites please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. You should always check these policies before you submit any personal data to these websites.

8 CHANGES TO THIS PRIVACY POLICY

- 8.1 Our Privacy and Cookies Policy may be reviewed and enhanced from time to time. The up-to-date version of our Privacy and Cookies Policy is always available by applying in writing to The Directors at Alcazar Investment Management Limited, 201 E1 Studios, Whitechapel Road, London, England, E1 1DU; or by emailing info@alcazar-im.com.
- 8.2 It may be necessary to contact you and obtain consent regarding any significant changes to our Privacy and Cookies Policy.

9 YOUR RIGHT TO ACCESS YOUR INFORMATION

- 9.1 The Act gives you the right to obtain a copy of the personal data we hold about you. The fee for obtaining a copy of your information is £10 which will go towards meeting our costs in providing you with details of the information we hold about you. We can provide you with that information further to a request in writing to The Directors at Alcazar Investment Management Limited, 201 E1 Studios, Whitechapel Road, London, England, E1 1DU providing us with sufficient information to identify you (we may need to request proof of identity in some instances). You have the right to request an amendment to any information that we hold and which you believe to be incorrect.

10 CONTACT

- 10.1 Questions, comments and requests regarding this Privacy and Cookies Policy are welcomed and should be addressed to info@alcazar-im.com
- 10.2 From time to time, Alcazar Investment Management Limited or third parties who we think have products or services of interest to you may send you emails, email newsletters or news updates alerting you to new features, products, promotions, or services pertaining to our Website. If you no longer wish to receive materials from us and/or from such third parties, you may opt-out of receiving these communications by writing to us at Alcazar Investment Management Limited, 201 E1 Studios, Whitechapel Road, London, England, E1 1DU, or by e-mailing us your request to unsubscribe to info@alcazar-im.com