

PERSONAL ASSETS TRUST PLC

PRIVACY POLICY

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Structure of this policy

This privacy policy is provided in a layered format so you can click through to the section which relates to the information that we collect about you below.

1. IMPORTANT INFORMATION AND WHO WE ARE

Personal Assets Trust Public Limited Company (registered number SC074582) (the "**Company**", "**we**", "**us**", or "**our**") is committed to protecting the privacy and security of personal data which is entrusted to us. This privacy policy aims to provide information on how the Company collects and processes personal data as a controller of data held about shareholders, investors, potential investors, business contacts, website users and directors or prospective directors ("**you**" or "**your**") including through your use of this website, by signing up to our mailing list, by sending us correspondence and/or providing us with products and/or service.

In addition, it outlines your data protection rights under applicable data protection laws, including the General Data Protection Regulation (Regulation 2016/679) as it forms part of the laws of the United Kingdom (the "**UK GDPR**").

This website is not intended for children and we do not knowingly collect data relating to children through this website.

Please contact the Company in writing at c/o Juniper Partners Limited, 28 Walker Street, Edinburgh EH3 7HR if you have any queries in relation to the processing of your personal data under this policy.

2. CATEGORIES OF DATA SUBJECTS

2.1. INVESTORS

Information we may collect about you

We may hold personal data about investors which is provided to us by you directly as a result of your holding and/or investment in the Company (including by completing application forms, fundraising documents, through our website, telephone calls and/or corresponding with us) or which is provided to us by third parties including due diligence service providers or our registrar (which is currently Equiniti plc). We may also process personal data about individuals that are connected with you as an investor (for example directors, trustees, employees, intermediaries, representatives, beneficiaries, shareholders, investors, clients, beneficial owners or agents).

In connection with your holding and/or investment in the Company, we may collect, store, and use the following categories of personal information about you: contact details (including name, title, address, telephone number, personal email address), your date of birth, copies of passport, driving licences and utility bills, bank account details, data received in connection with anti-money laundering and/or due diligence activities (including politically exposed persons and sanctions checks), data related to any public comments about you by

statutory or regulatory authorities (including designated professional bodies) and details relating to your investment activity.

How we will use information about you

Your personal data may be processed by the Company or its processors or sub-processors (or any of their affiliates, agents, delegates or sub-contractors) for the following purposes:

- (a) to provide you with information on the Company (including performance updates), which is being carried out to pursue the Company's legitimate interests including for developing its business;
- (b) in relation to prospective investors, we may process personal data for identification purposes (prior to becoming an investor), for the purposes of anti-money laundering, counter terrorist financing, suitability and appropriateness assessments, "Know Your Client" and credit-worthiness checks, which are being carried out to enable us to enter into a contract with you pursuant to registering you as an investor and for any other applicable legal or regulatory reasons;
- (c) to allow us to administer and manage your holding or beneficial holding in the Company (including fee calculations and the payment of dividends) which are necessary for the Company to perform its contract with you, comply with applicable laws and/or in its legitimate interest;
- (d) to assist us in conducting market research, which is being carried out to pursue the Company's legitimate interests of analysing trends and investigating product sales and performance;
- (e) to update and maintain records for the Company, including maintaining statutory registers, which is necessary to comply with the Company's legal obligations;
- (f) to carry out ongoing anti-money laundering checks and other actions in an attempt to detect, prevent, investigate and prosecute fraud and crime, which the Company considers necessary for compliance with its legal obligations, for the performance of a task being carried out in the public interest and/or to pursue the Company's legitimate interests (including for the prevention of fraud, money laundering, sanctions, terrorist financing, bribery, corruption and tax evasion);
- (g) to prepare tax related information in order to report to tax authorities in compliance with a legal obligation to which the Company is subject;
- (h) to scan and monitor emails sent to us (including attachments) for viruses or malicious software, to process and encrypt personal data to protect and manage email traffic, and to store personal data on our systems to pursue our legitimate interests including for document retention purposes and IT security; and
- (i) such other actions as are necessary to manage the activities and/or to comply with the legal obligations of the Company, including by processing instructions and

enforcing or defending the rights and/or interests of the Company, in order to comply with its legal obligations and/or to pursue the Company's legitimate interests.

Where such processing is being carried out on the basis that it is necessary to pursue the Company's legitimate interests, we will only carry out such processing if these legitimate interests are not overridden by your interests, fundamental rights or freedoms. Such processing may include the use of your personal data for the purposes of sending you electronic marketing communications (on a business to business basis and/or where you have asked to receive marketing emails), in relation to which you can at any time unsubscribe by following the instructions contained in each marketing communication.

If we consider it necessary to obtain your consent in relation to the use of your personal data (such as for sending unsolicited marketing emails to individuals), you will be asked to provide this and/or we will contact you to request this consent. In such circumstances, we will provide you with full details of the personal data that we would process and the reason for processing, so that you can carefully consider whether you wish to consent. If you decide to provide your consent, you have the right to withdraw your consent at any time, although that will not affect the lawfulness of processing based on consent before its withdrawal. To withdraw your consent or to opt out of receiving marketing communications, please contact us in writing or follow the unsubscribe instructions included in each electronic marketing communication. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

We do not knowingly or intentionally collect special category data from you, and you must not submit special category data to us. If, however, you otherwise inadvertently or intentionally transmit special category data to us, you will be considered to have explicitly consented to us processing that special category data under Article 9(2)(a) of the UK GDPR. We will use and process your special category data for the purposes of deleting it.

2.2. VISITORS TO OUR WEBSITE

The kind of information we hold about you

We may collect, use, store and transfer different kinds of personal data about you which you provide to us through our website: name, date of birth, address, email address, telephone numbers, technical data (including internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website, usage data (including information about how you use our website, products and services, and marketing and communications preferences (including your preferences in receiving marketing from us and your communication preferences).

We do not collect any sensitive personal data or special categories of personal data about you through our website (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership,

information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

How we collect your data

We use different methods to collect data from and about you including through:

- Direct interactions with you, including by filling in forms. This includes personal data you provide when you subscribe to our publications and/or request marketing to be sent to you.
- Automated technologies or interactions. As you interact with our website, we may automatically collect technical data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies.
- Technical data from analytics providers such as Google based in the cloud with no central depository.

How we will use information about you

Your personal data may be processed by the Company or its processors or sub-processors (or any of their affiliates, agents, delegates or sub-contractors) for the following purposes:

- to send you updates on the performance of the Company, newsletters, invitations to events and other electronic marketing communications which we will do (a) on the basis of our legitimate interests and/or with your consent;
- to use data analytics to improve our website, marketing, customer experiences on the basis of our legitimate interests;
- to comply with legal or regulatory requirements;
- to scan and monitor emails sent to us (including attachments) for viruses or malicious software, to process and encrypt personal data to protect and manage email traffic, and to store personal data on our systems to pursue our legitimate interests including for document retention purposes and IT security; and
- such other actions as are necessary to manage the activities of the Company, including by processing instructions, and enforcing or defending the rights and/or interests of the Company in order to comply with our legal obligations and/or to pursue our legitimate interests.

We will use your personal data in the following circumstances: where it is necessary for our legitimate interests, or those of a third party and where your interests and fundamental rights or freedoms are not overridden by those interests, or where we need to comply with a legal or regulatory obligation.

If we consider it necessary to obtain your consent in relation to the use of your personal data (such as for sending unsolicited marketing emails to individuals), you will be asked to provide this and/or we will contact you to request this consent. In such circumstances, we will provide you with full details of the personal data that we would process and the reason for processing, so that you can carefully consider whether you wish to consent. If you decide to provide your consent, you have the right to withdraw your consent at any time, although that will not affect the lawfulness of processing based on consent before its withdrawal. To withdraw your consent or to opt out of receiving marketing communications, please contact us in writing or follow the unsubscribe instructions included in each electronic marketing communication. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another lawful basis for doing so.

We do not knowingly or intentionally collect special category data from you, and you must not submit special category data to us. If, however, you otherwise inadvertently or intentionally transmit special category data to us, you will be considered to have explicitly consented to us processing that special category data under Article 9(2)(a) of the UK GDPR. We will use and process your special category data for the purposes of deleting it.

Links to third party websites

Where this website provides links to other websites, the Company is not responsible for the data protection/privacy/cookie usage policies of such other websites, and you should check these policies on such other websites if you have any concerns about them. If you use one of these links to leave our website, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting a linked website and such websites are not governed by this policy. You should always exercise caution and review the privacy policy applicable to the website in question.

Cookies

You can find more information about the individual cookies that we use and the purposes for which we use them in our Cookie Policy available at <https://www.patplc.co.uk/cookies/>.

For further details on cookies (including how to turn them off) can be found at www.allaboutcookies.org.

2.3. BUSINESS CONTACTS

The following section of this policy sets out how the Company may process personal data (as a controller) about its business contacts and (current, previous and/or potential) service providers (and employees of service providers) and data subjects that have provided a business card to, or have corresponded with the Company.

The kind of information we hold about you

We may collect, use, store and transfer different kinds of personal data about you which you provide to us including: name, date of birth, address, email address, telephone numbers, place of work and job title.

We do not collect any sensitive personal data or special categories of personal data about you through our website (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

How we will use information about you

We will use your personal data in the following circumstances: where it is necessary for our legitimate interests, or those of a third party and where your interests and fundamental rights or freedoms are not overridden or where we need to comply with a legal or regulatory obligation.

Your personal data may be processed by the Company, its processors or its sub-processors (or any of their affiliates, agents, delegates or sub-contractors) for the following purposes:

- to hold your personal data on our system and to contact you on the basis of the legitimate interests of the Company (including in connection with using the services that you provide);
- in respect of suppliers, to allow us to process payments and orders in respect of any goods and services provided on the basis of our legitimate interests;
- to send you updates on the performance of the Company, newsletters, invitations to events and other electronic marketing communications which we will do (a) on the basis of our legitimate interests if you are a business; or (b) with your consent;
- to comply with legal or regulatory requirements;
- to scan and monitor emails sent to us (including attachments) for viruses or malicious software, to process and encrypt personal data to protect and manage email traffic, and to store personal data on our systems to pursue our legitimate interests including for document retention purposes; and
- such other actions as are necessary to manage the activities of the Company, including by processing instructions and enforcing or defending the rights or interests of the Company, in order to comply with our legal obligations and/or to pursue our legitimate interests.

If we consider it necessary to obtain your consent in relation to the use your personal data (such as for sending unsolicited marketing emails to individuals), you will be asked to provide this and/or we will contact you to request this consent. In such circumstances, we will provide you with full details of the personal data that we would like and the reason we need it, so that you can carefully consider whether you wish to consent. If you decide to provide your

consent, you have the right to withdraw your consent at any time, although that will not affect the lawfulness of processing based on consent before its withdrawal. To withdraw your consent or to opt out of receiving marketing communications, please contact us in writing or follow the unsubscribe instructions included in each electronic marketing communication. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another lawful basis for doing so.

Where processing is being carried out on the basis that it is necessary to pursue the Company's legitimate interests, we will only carry out such processing if these legitimate interests do not override your interests, fundamental rights or freedoms. Such processing may include the use of your personal data for the purposes of sending you electronic marketing communications (on a business to business basis and/or where you have asked to receive marketing emails), in relation to which you can at any time unsubscribe by following the instructions contained in each marketing communication.

We do not knowingly or intentionally collect special category data from you, and you must not submit special category data to us. If, however, you otherwise inadvertently or intentionally transmit special category data to us, you will be considered to have explicitly consented to us processing that special category data under Article 9(2)(a) of the UK GDPR. We will use and process your special category data for the purposes of deleting it.

2.4. DIRECTORS AND PROSPECTIVE DIRECTORS

The following section of this policy sets out how the Company may process personal data (as a controller) about its (current, previous and/or prospective) directors.

The kind of information we hold about you

We may collect, use, store and transfer different kinds of personal data about you which we obtain from third party service providers (such as recruitment agencies, third parties who assist with our diligence and background checks and publicly available sources) or which you provide to us. This data includes: name, sex, gender, gender identity, date of birth, address, email address, telephone numbers, place of work, job title, photo identification, nationality, citizenship, tax residency, passport details, national insurance number and other tax details, banking details, signed contracts with you, contact sheets and biographies, career data such as places of work, job history, qualifications and CV, financial dealings, marital status and details of other relatives or persons closely associated with you including family connections (including dependents, who may be under the age of 18) and beneficiaries, the number of shares legally and beneficially held by you or any person closely associated with you in the Company, and any such holdings in any other securities related to the Company, current and/or former directorships, details of any disqualifications as a director or disqualifications from acting in company management or from conduct of company affairs, attendance and voting records at board meetings, data relating to insolvency proceedings involving you or entities you have been or are connected with, data received from due diligence activities (such as anti-money laundering, politically exposed persons and sanctions checks), data related to any public criticisms of you by statutory or

regulatory authorities (including designated professional bodies), fraud enquiries (for example, information from police reports), recordings of telephone conversations, electronic communications with our staff, details of your socio-economic background and certain special category data and data considered more sensitive (which may include details of criminal convictions, ethnicity, age, sexual orientation, religion and beliefs, physical or mental impairment, socio-economic background and native language).

How we will use information about you

We will use your personal data in the following circumstances: where it is necessary for our legitimate interests, or those of a third party, where it is necessary to enter into or perform a contract with you and where your interests and fundamental rights or freedoms are not overridden or where we need to comply with a legal or regulatory obligation.

Your personal data may be processed by the Company, its processors or its sub-processors (or any of their affiliates, agents, delegates or sub-contractors) for the following purposes:

- To hold your personal data on our system and to contact you on the basis of the legitimate interests of the Company;
- To appoint (or consider appointing) you as a director and to administer our relationship with you as a director. In relation to prospective directors, we may process personal data to carry out background and reference checks or to assess your skills and qualifications, to consider your suitability for the role of director and to decide whether to enter into a contract with you, and to comply with our obligations under the Financial Conduct Authority ("**FCA**") Listing Rules. We may also process data to communicate with you about the recruitment process and to keep records relating to our hiring process. In relation to directors, we may process your personal data to administer/perform the contract we have entered into with you, including arranging the payment of directors' fees and the reimbursement of expenses.
- To seek to improve transparency on the diversity of our board and benefit both corporate governance and decision making by us on the basis of complying with legal or regulatory requirements, including to comply with the diversity and inclusion requirements in the FCA's Listing Rules and Disclosure Guidance and Transparency Rules;
- To comply with legal or regulatory requirements.
- To scan and monitor emails sent to us (including attachments) for viruses or malicious software, to process and encrypt personal data to protect and manage email traffic, and to store personal data on our systems to pursue our legitimate interests including for document retention purposes.
- Such other actions as are necessary to pursue and develop the Company's business or manage the activities of the Company, including by processing

instructions and enforcing or defending the rights or interests of the Company, in order to comply with our legal obligations and/or to pursue our legitimate interests.

If we consider it necessary to obtain your consent in relation to the use of your personal data, we will contact you to request this consent. In such circumstances, we will provide you with full details of the personal data that we would like and the reason we need it, so that you can carefully consider whether you wish to consent. If you decide to provide your consent, you have the right to withdraw your consent at any time, although that will not affect the lawfulness of processing based on consent before its withdrawal. Once we have received notification that you have withdrawn your consent, we will no longer process your personal data for the purpose(s) you agreed to, unless we have another lawful basis for doing so.

Where processing is being carried out on the basis that it is necessary to pursue the Company's legitimate interests, we will only carry out such processing if these legitimate interests do not override your interests, fundamental rights or freedoms.

Special category data

We may hold special category data if it is necessary for us to comply with legal and regulatory obligations (see further details below).

Where we process special category data, we ensure that such processing satisfies one of the additional conditions required for processing special categories of personal data. We may process special categories of personal data in the following circumstances:

- in limited circumstances, with your explicit written consent; and
- where it is needed in the public interest, such as for equality of opportunity or treatment or racial and ethnic diversity at senior levels of organisations.

We do not otherwise knowingly or intentionally collect special category data from individuals, and you must not submit special category data to us. If, however, you otherwise inadvertently or intentionally transmit special category data to us, you will be considered to have explicitly consented to us processing that special category data under Article 9(2)(a) of the UK GDPR. We will use and process your special category data for the purposes of deleting it.

Processing of information about criminal convictions

We may also process information about criminal convictions. Where you apply to become a director, you are required to disclose to us details of any unspent convictions in relation to indictable offences. We may also carry out a criminal records check in order to satisfy ourselves that there is nothing in your criminal convictions history which makes you unsuitable for the role. We will only collect and use information about criminal convictions if it is appropriate given the nature of the role and where we have a lawful basis to do so. For example, we may use information relating to criminal convictions in relation to legal claims, where regulatory requirements relating to unlawful acts and dishonesty apply, to prevent

fraud and to prevent and detect unlawful acts, to protect the public against dishonesty, or where you have already made the information public.

3. **DISCLOSURES OF YOUR PERSONAL DATA**

We will not disclose personal information we hold about you to any third party except as set out below.

We may disclose your personal data to third parties who are providing services to us, including IT service providers, PR and marketing service provider, recruitment agencies, processors of the Company (including printers, registrars, brokers, the manager, the AIFM, administrators), other professional advisers of the Company, telephone service providers, document storage and execution providers, backup and disaster recovery service providers.

We may also disclose personal data we hold to third parties in the following circumstances:

- (a) where your shares are held through a broker, dealer, bank, custodian, trust company, financial adviser or other nominee (each a "**Nominee**") and it is lawful for us to do so, then details of your investments and valuations may also be provided to such Nominee;
- (b) where we sell any business or assets, in which case we may disclose personal data we hold about you to the prospective and actual buyer of such business or assets;
- (c) we may disclose to relevant tax authorities, regulators (including the FCA), government departments or competent authorities of the UK or of other countries (such as Companies House) or make public disclosures, including publishing in our annual accounts (including on a no-names basis) any personal data (including sex, gender, ethnicity/ethnic background, tax status, identity or residency or other personal and payment information, documents or self-certifications) in order to comply with a court order or to meet legal and regulatory requirements arising in the conduct of our business. Such disclosure may be made directly to such regulators or competent authorities or made indirectly to our advisers or providers who will make such filings or disclosures on our behalf; and/or
- (d) if we are permitted by law to disclose your personal data to a third party or are under a legal obligation to disclose your personal data to that third party.

4. **DATA RETENTION**

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

5. INTERNATIONAL TRANSFERS

We do not transfer your personal data outside the UK unless it is to a country or territory that has been deemed to provide an adequate level of protection for personal data by the Secretary of State.

6. DATA SECURITY

The Company has put in place measures designed to ensure the security of the personal data it collects and stores about you. It will use its reasonable endeavours to protect your personal data from unauthorised disclosure and/or access, including through the use of network and database security measures, but it cannot guarantee the security of any data it collects and stores.

We have put in place through our service providers appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

7. YOUR LEGAL RIGHTS

In certain circumstances, by law you have the right to:

- Request access to your personal information (commonly known as a “data subject access request”). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- Request erasure of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- Object to processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.

- Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- Request the transfer of your personal information to another party.
- Withdraw your consent. If we are processing your personal data on the basis of your consent, you have the right to withdraw such consent at any time. Withdrawing your consent will not affect the lawfulness of processing based on consent before its withdrawal. To withdraw your consent or to opt out of receiving marketing communications, please contact us in writing or following the unsubscribe instructions included in each electronic marketing communication. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another lawful basis for doing so.

If you wish to exercise any of the rights set out above, please contact us in writing at c/o Juniper Partners Limited, 28 Walker Street, Edinburgh EH3 7HR.

You will not usually have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

8. CHANGES TO THIS PRIVACY NOTICE

We may update this privacy notice from time to time and will ensure that any changes to this notice are added to the notice available on our website on their effective date. We may also notify you from time to time about the processing of your data.

9. FURTHER INFORMATION

If you have any queries about this policy or your personal data, or you wish to submit an access request or raise a complaint about the way your personal data has been handled, please do so in writing and address this to the Company at c/o Juniper Partners Limited, 28 Walker Street, Edinburgh EH3 7HR.