

Absolute Return Investment Advisers (ARIA) Limited, ARIA SICAV P.L.C. , Absolute Return Investment Advisers (ARIA) Limited (Dubai Branch) and their affiliates (together, “ARIA”, “we”, “us”) jointly operate this website and are responsible for the processing of your personal data and are the joint data controllers for all such information. We regard your privacy as very important. Any personal information you provide to us through this website will be dealt with in accordance with this privacy policy, the Terms of Use of this website and any signed authority form that you give to us. This privacy policy describes the information we may collect from you and the purpose for our collection of it.

### **Data Protection**

As data controller, we take all necessary steps to comply with the applicable laws and regulations when handling any personal information.

Our Custodian, SEI Investments (Europe) limited and our custody agent, Fusion Wealth Limited may also be a Data Controller in relation to your personal data processed using the Fusion Wealth Platform Service. For more information on how SEI Investments (Europe) Limited process your personal data, you can review their policy here: **SEI GDPR Privacy Notice**. For more information on how Fusion Wealth Limited process your personal data, you can review their policy here: **Fusion Privacy Policy**. Please note that by clicking on these links, you will be taken to the websites provided by third parties over which We have no control and which will be subject to separate terms and conditions.

When you supply any personal information to us we will meet our legal obligations to you in the way that we deal with that information.

In accordance with the applicable laws and regulations, we are required to collect the information fairly and to let you know how we will use it and whether we will pass the information on to anyone else (see below).

We will comply with the Principles set out in the Data Protection Act 1998 and the GDPR and we will ensure all personal information supplied to us is held securely.

We will ensure that any information will be held only as long as is necessary to ensure our service runs smoothly.

We use up to date industry procedures to keep personal data as safe and secure as possible against loss, unauthorised disclosure or access.

You have a right to access the information we hold about you. Should you wish to obtain a copy of the personal data we hold on you please write to the Compliance Officer, at ARIA Capital Management, Ground Floor, 2 Bell Court, Leapale Lane, Guildford, Surrey, GU1 4LY. As soon as we are satisfied as to your identity we will send you, within a month of receipt of your written request, a copy of all the data we hold concerning you. Please contact us at the same address if you have any reason to believe the data we hold on you is inaccurate.

### **What personal information do we collect and why do we collect it?**

We will collect only the personal data for agreed purposes. For the purpose of opening an account with us or providing investment services by us, we will request the personal data from you. We are also obliged to comply with the laws and regulations related to anti-money laundering, counter terrorist financing and other financial crimes. We process many categories of personal data, including as appropriate for the services we are providing to you:

- Contact details, such as your title, name, residential address, email address, telephone number
- Investments and other financial and transactional data, such as bank account information
- Other personal data such as date of birth, NI, passport number and any information provided to Us as part of declarations, platform agreement, subscription forms or by filling in any forms
- Record of correspondence and communication with you as required by various regulations in relation to provision of financial services
- Details of your access to certain ARIA services, including your IP address, information viewed or searched for, page response times, lengths of visit, login information, browser type and version, traffic data, location data, weblogs and other communication data, and the resources that you access, so We may compile statistics relating to your use of ARIA service.

For certain services provided by us, the provision of your full name, postcode, e-mail address, date of birth, tax identification, primary passport country, nationality and country of birth, together with confirmation of whether you are a US Person (as defined in the ARIA IP Terms and Conditions) and/or a PEP are all required from you in order to register you on ARIA IP.

When submitting general enquiries, your name and e-mail address are required from you to enable Us to respond to your enquiry.

We will inform you at the point of collecting information from you, whether you are required to provide any other information to Us.

### **What we do with your personal data**

We rely on the fulfilment of Our contractual obligations as the lawful basis for processing your personal data. This may be pursuant to any terms and conditions or end user licence agreements you have entered into with us.

We also rely on “legitimate interests” for processing your personal data. The legitimate interest is processing your personal data as part of the performance of Our contract with your Adviser or is responding and contacting you regarding any enquiries you make in relation to any services We offer.

### **Purpose of processing**

We use information held about you in the following ways:

- To provide you with the selected ARIA services.
- To ensure that content on our services is presented in the most effective manner for you and for the device(s), you use to access and use our service.
- To set up and administer your accounts or those accounts provided via third parties relating to the use of our service.
- To send you statements, information relating to transactions that have taken place through ARIA IP service and providing periodical valuations relating to your investments.
- To send you service, support and administrative messages, reminders, technical notices, updates, security alerts, and information requested by you.
- To operate, protect, improve and optimise ARIA services, Our business, and Our users' experience, such as to perform analytics, conduct research, personalise or otherwise customise your experience, and for advertising and marketing.
- To respond to any enquiries you submit to Us;
- To carry out Our obligations arising from any contracts entered into between you and Us.
- To make payment to Advisers and other contracted third parties on your behalf.
- As part of Our efforts to keep our services safe and secure.
- To complete electronic ID verification checks as We are required to do by applicable law.

### **Marketing**

In addition to the above uses We may use your personal data to notify you about additional services provided by us which may be of interest to you. For such uses We will only contact you by electronic means (e-mail) if you have provided Us with your email address when We collect your personal data.

If you do not want Us to use your personal data in this way please either (i) tick the relevant box situated on the form or page on which We collect your personal data (for example, a registration form or a website page); (ii) unsubscribe from our electronic communications using the method indicated in the relevant communication; or (iii) inform Us at any time by contacting Us at the contact details set out below.

### **Cookies**

ARIA uses cookies to help provide the best website experience and make our website easy to use.

A cookie is a small text file that is downloaded onto your device (like a tablet or computer) when you access our website. It allows our website to recognise your device and store some information on your preferences and past actions.

You can read more about cookies that we use here: <https://www.ariacm.com/cookie-notice/>

Where you are a person who has not attained the required age to provide valid consent to the processing of your personal data (as determined by applicable law), any processing of your personal data will be subject to the consent of your appointed legal guardian.

### **Third Party Marketing**

We will not sell, share or pass your personal data to a third party for marketing purposes unless you have expressly consented to Us doing so.

If you do not wish to be contacted about or receive marketing information from us send an e-mail to [email@ariacm.com](mailto:email@ariacm.com) or write to The Data Protection Officer at the address set out above. Alternatively, please follow the unsubscribe link located within the e-mail marketing correspondence.

### **To whom will we supply your personal data?**

Any personal data provided by you to us at any time will be processed in accordance with the applicable laws. We will mainly use your personal data in connection with the provision of our services to you. Your personal data may be disclosed to your appointed Adviser, our custody agent Fusion Wealth Limited and our custodian, SEI Investments (Europe) limited. In addition to these, we may pass your personal data to our third party service providers, agents, subcontractors and associated organisations for the purposes of: (a) completing tasks and providing services to you on our behalf and (b) storing, protecting and securing your personal data. We may also disclose your personal data to third parties if we are under a duty to disclose or share your personal data in order to comply with any legal or other regulatory obligation, including the orders of the FCA, MFSA or any court of competent jurisdiction and/or to protect our rights, property, or safety or that of our affiliated entities and our users and any third party we interact with to provide our services.

Other than as set out above, and save insofar as is necessary in order for Us to carry out Our obligations arising from any contracts entered into between you and Us, We will not share your data with third parties unless We have procured your express consent to do so.

### **International Transfers**

All information We hold about you is stored on Our secure servers within the EEA or in UAE.

The data that We collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). 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 held securely and in accordance with this Policy. Countries outside the EEA do not have the same data

protection laws as the United Kingdom and EEA and We have therefore ensured that our affiliated companies outside EEA and any of our suppliers who may transfer your personal data outside the EEA has put in place appropriate measures to protect your data, either by being a member of the US-EU Privacy Shield, or by entering into a European Commission approved contract (as permitted under Article 46(5) of the General Data Protection Regulation).

If you would like further information, please contact your Adviser. You may also contact Us using the contact details below. We will not otherwise transfer your personal data outside of the EEA or to any organisation (or subordinate bodies) governed by public international law or which is set up under any agreement between two or more countries.

#### **Errors and Omissions**

If you believe that the information we hold on you is incorrect, please email [compliance@ariacm.com](mailto:compliance@ariacm.com). We will review your record as soon as possible.

#### **Links to other websites**

This Privacy Policy only extends to this website and does not therefore extend to your use of, provision of data to and collection of data on any website not connected to Absolute Return Investment Advisers Ltd to which you may link by using the hypertext links within this website.

#### **Changes to this Privacy Policy**

We may edit or amend this Privacy Policy from time to time. If we make any substantial changes in the way we use your personal information we will notify you by posting a prominent notice on the Home page of our website.

#### **Contacting Us and Complaints**

If you have any questions about our Privacy Policy or any other aspect of this website or any services provided by ARIA Capital Management or affiliated companies, please contact us at:

ARIA Capital Management, Ground Floor, 2 Bell Court, Leapale Lane, Guildford, Surrey, GU1 4LY Telephone (UK): 0203 137 3840

Telephone (UAE): +971 4325 2800

E-mail: [compliance@ariacm.com](mailto:compliance@ariacm.com)

Office Opening Times: 9.00am – 5.30pm

The General Data Protection Regulation also gives you right to lodge a complaint with a supervisory authority, in particular in the European Union (or European Economic Area) state where you work, normally live or where any alleged infringement of data protection laws occurred.

- The supervisory authority in the UK is the Information Commissioner who may be contacted at <https://ico.org.uk/concerns/> or telephone: 0303 123 1113.
- The supervisory authority in Malta is the Office of the Information and Data Protection Commissioner who may be contacted at <https://idpc.org.mt/en/Pages/Home.aspx>