

LONDON LGPS CIV LIMITED: DATA PRIVACY NOTICE FOR INVESTORS AND BUSINESS CONTACTS

Introduction

This privacy notice provides you with information about how, when and why London LGPS CIV Limited (“we”, “us”, “our”), uses and otherwise processes personal data relating to our business contacts and the investors in the London LGPS CIV Authorised Contractual Scheme or other investment structure operated by us (“you”, “your”) and how we keep it secure. It also sets out your rights under applicable data protection laws relevant to us and how you can contact us to exercise them. In addition we give some important information about the security of your personal data.

Your personal data – what information we will use and when

We are ‘data controller’ of your ‘personal data’ which is shared with us, or otherwise obtained by us, in respect of your business communication with us and/or contract with us relating to your investment in the London LGPS CIV Authorised Contractual Scheme or other investment structure operated by us (your “investment”). This includes, but is not limited to, your ‘personal data’ which we obtain:

- in respect of any enquiries about the services provided by us;
- through your use of our online portal (including through our website);
- in any application form you complete to purchase units in your investment (relevant only if you are an investor);
- through our, or our service providers’, request in relation to compliance with UK anti-money laundering legislation or compliance with any other applicable laws and regulations (relevant only if you are an investor);
- through our, or our service providers’, request in order to maintain your account with the us; and
- in any correspondence and communications between you and us which will include email, telephone, post and online portals (including through our website).

All such terms have the meanings given to them under the relevant data protection law including the Data Protection Act 1998, (from 25 May 2018) the General Data Protection Regulation (EU) 2016/679 (“**GDPR**”), and any legislation that in respect of the United Kingdom replaces or converts into domestic law the GDPR or any other law relating to data protection, the processing of personal data and privacy as a consequence of the United Kingdom leaving the European Union (“**Data Protection Laws**”).

In the case of general business contacts your “personal data” will include your name, contact details, email address and information about the contact that you have with us and the enquires you make (for example details which you choose to include in communications with us). This personal data will be collected, stored and processed for the purposes of:

- communications between us and you in relation to potential investments on behalf of your client or employer or more generally as and when required as a result of your contact with us (and such communications may be by way of post, email (including website portals) and telephone);
- improving the quality of services provided by us; and
- complying with requests by law enforcement or regulatory bodies or from our service providers for example auditors where this is required.

(the “**Business Contact Purpose**”).

In the case of investors your ‘personal data’ which is provided to us acting in our capacity as the ‘data controller’, will include your names, date of birth, contact details, bank account details, proof of identity (such as passport details) transactions and the invested amount, in each case if and to the extent the same relates to you, CCTV images, and (in cases where the investment is on behalf of a third party) all such details relating to that third party. This ‘personal data’ will be collected, stored and processed for the purposes of:

- administering your investments, in accordance with the terms of your contract with us and for compliance with laws and regulations including, but not limited to, the Financial Conduct Authority’s Handbook of Rules and Guidance and UK anti-money laundering legislation;

- maintaining the register of unitholders; processing subscriptions of unitholders; facilitating redemption and income payments to unitholders; facilitating reconciliation of investor activity with payments made or received; facilitating regulatory obligations in terms of tax reporting and payments; improving the quality of the service provided to you; and complying with applicable anti-money laundering rules and other legal obligations, such as maintaining controls in respect of late trading and market timing practices;
- communications between us and you, in relation to changes to your investment or more generally as and when required as a result of your contract with us (and such communications may be by way of post, email (including website portals) and telephone); and
- complying with requests from enforcement or regulatory bodies or from our, or the investments, service providers, for example the auditors, where this is required

(the “**Investor Purpose**”, with the Business Contact Purpose and the Investor Purpose being referred to together as the “**Purposes**”).

Some of this ‘personal data’ will come from publicly available sources such as the electoral roll.

In the case of the Investor Purpose you acknowledge that your contract with us cannot be administered or complied with absent the collection of information, including personal data, obtained by us as mentioned above, and that accordingly your personal data is collected on a “need to know” basis for the purposes more particularly described in this data privacy notice. The legal basis on which we are processing the ‘personal data’ for the Investor Purpose is processing necessary for compliance with our legal obligations, and processing that is necessary for our legitimate interest in our role as operator of your investment.

In the case of Business Contacts Purpose you acknowledge that the collection and processing of information, including personal data, obtained by us as mentioned above, is necessary to the conduct of our business relationship and that accordingly your personal data is collected on a “need to know” basis for the purposes more particularly described in this data privacy notice and all this is lawful based on our legitimate interests as described here.

When we will share your personal data

In order to satisfy the Purposes, and for our legitimate interest in doing so, we may share your ‘personal data’ with third parties appointed by us, or on our behalf.

For both investors and business contacts we may need to share your ‘personal data’ with our professional advisers; regulatory and governmental authorities such as the FCA and the Information Commissioner’s Office; our auditors and insurers. The legal basis for this under the Data Protection Laws is our legitimate interest for compliance with our legal obligations.

We may share your ‘personal data’ with buyers and their professional representatives in the event of a sale or restructuring of our business or assets. It may in addition be shared under our direction with our service providers such as IT and data storage companies so that they can provide their services. It may also be shared with courts and law enforcement agencies for compliance with our legal obligations or for establishing or defending legal rights (which is a legitimate interest of ours for the purposes of the Data Protection Laws).

For the Investor Purpose in relation to your contract with us or your investment, we may share your ‘personal data’ with, in particular at this, time Northern Trust Global Services PLC, acting as Administrator, Registrar and Transfer Agent and Depositary of the London LGPS CIV Authorised Contractual Scheme, and The Northern Trust Company, acting in its capacity as Custodian, of the London LGPS CIV Authorised Contractual Scheme (which entities may be replaced from time to time), and in the provision of tax services, and in addition it may be disclosed to any Investment Advisor(s) or Investment Manager(s). You understand that where the London LGPS CIV Authorised Contractual Scheme invests in another tax transparent fund, we, Northern Trust Global Services PLC and/or The Northern Trust Company (or their replacements from time to time) may be required to disclose your personal data to the manager, depositary and/or custodian of the underlying tax transparent fund to enable the tax transparency to be effective. Where relevant, you acknowledge that this may include the transfer of your ‘personal data’ outside the European Economic Area (“EEA”) to countries or territories which do not have the same level of protection for ‘personal data’. Further details on these transfers are below.

For the Investor Purpose, your 'personal data' may also be disclosed to HM Revenue & Customs which may, in turn, share that information with the relevant authorities of the country or countries in which you are resident for the purposes of tax as part of our tax reporting obligations under the EU Directive on Administrative Co-operation and the United Kingdom's inter-governmental agreements to improve international tax compliance including FATCA (the "Agreements").

Keeping your personal data

Your 'personal data' will be retained by us for as long as necessary to satisfy the relevant Purpose and to comply with legal and regulatory obligations. These are the two criteria which are used by us to determine the retention period.

Transferring your personal data

Your 'personal data' may be transferred outside the UK and the EEA such as to the service providers and the tax authorities mentioned above. Some countries already provide adequate legal protection for personal information. We will make sure that suitable safeguards are in place before transfers are made to countries which do not. For more information about safeguards and (as relevant) how to obtain a copy of them or where they are made, see the contact details below.

Monitoring of communications

Subject to applicable laws, we may monitor and record calls, emails and other communications as well as the use of our systems and devices with you. We will do this for compliance with regulatory rules, self-regulatory practices or procedures relevant to our business, to prevent or detect crime, in the interests of protecting the security of our communications systems and procedures, and for quality control and staff training purposes.

Your rights in relation to the personal data we will hold and process

Here is a list of the rights that you have under Data Protection Laws. Some of these rights might not be relevant in practice given that we will only use your 'personal data' in very limited ways. You should contact us for more details, including if you wish to exercise any of these rights. We will explain at that time if they are applicable or not.

- The **right to be informed** about your processing of your personal information;
- The right to have your personal information **corrected if it is inaccurate** and to have **incomplete personal information completed**;
- The right **to object** to processing of your personal information;
- The **right to restrict processing** of your personal information;
- The right **to have your personal information erased** (the "right to be forgotten");
- The right to **request access** to your personal information and to obtain information about how we process it;
- The right to **move, copy or transfer your personal information** ("data portability");
- Rights in relation to **automated decision making** including profiling.

In addition you have the right to complain to the Information Commissioner's Office which enforces data protection laws: www.ico.org.uk/concerns or call its helpline on 0303 123 1113.

Contact details

We can be contacted at:

Name: Client Services

Address: London LGPS CIV Limited, 59^{1/2} Southwark Street, London SE1 0AL.

Tel:

Email: clientservices@londonciv.org.uk

Last updated: May 2018