LANDSEER ASSET MANAGEMENT

PRIVACY POLICY

Last updated: July 2026

Landseer Asset Management ("Landseer", "we", "us" or "our") is committed to protecting the privacy and security of your personal data. This Privacy Policy explains how we collect, use, share, and protect personal data in connection with our website at www.landseeram.com (the "Website"), our investment management and advisory services, and our other business dealings with clients, prospective clients, investors, suppliers, and other individuals.

This Policy is issued in accordance with the UK General Data Protection Regulation, the EU General Data Protection Regulation (Regulation (EU) 2016/679) where applicable, and the Data Protection Act 2018 (together, "Data Protection Law"), and should be read alongside our Cookie Policy and Terms of Use.

1. Who We Are

Landseer Asset Management is the trading name of Landseer Asset Management UK LLP ("Landseer"), a company registered in England and Wales under company number OC431777, with its registered office at 4 Albemarle Street, Mayfair, London, W1S 4GA, England. Landseer is authorised and regulated by the Financial Conduct Authority (FCA), firm reference number FRN951602.

For the purposes of Data Protection Law, Landseer is the data controller in respect of the personal data described in this Policy, unless stated otherwise (for example, where we act as a data processor on behalf of a fund or institutional client under a separate agreement).

2. Contact Details and Our Data Protection Officer

If you have any questions about this Policy or how we handle personal data, please contact:

- Data Protection Officer: clientservices@landseeram.com
- Postal address: Registered Office Address (as above), marked for the attention of the Data Protection Officer

3. Scope of This Policy

This Policy applies to personal data we collect and process in relation to:

- Visitors to and users of our Website;
- Prospective, current, and former clients (individuals, and individuals connected with corporate, trust, or institutional clients, such as directors, trustees, beneficial owners, and authorised signatories);
- Investors and prospective investors in funds or mandates we manage or advise on;
- Individuals who contact us, subscribe to our communications, or attend our events;
- Job applicants and candidates;
- Representatives of our suppliers, advisers, and other third parties we deal with.

This Policy does not apply to Landseer employees, whose personal data is addressed in our internal HR privacy notice.

4. Personal Data We Collect

We collect personal data directly from you, automatically through your use of the Website, and from third parties. The categories of personal data we may process include:

4.1 Identity and Contact Data

- Full name, title, date of birth, nationality, and government-issued identification details
- Postal address, email address, and telephone number
- Signature and photographic identification (for identity verification)

4.2 Financial and Investment Data

- Financial situation, source of wealth and source of funds, investment objectives, risk tolerance, and investment experience (for suitability and appropriateness assessments)
- Bank account and payment details
- Tax residency and tax identification numbers (for example, for FATCA/CRS reporting)
- Details of holdings, transactions, and investment performance

4.3 Due Diligence and Regulatory Data

- Information collected for anti-money laundering (AML), counter-terrorist financing, sanctions screening, and know-your-client (KYC) purposes
- Politically exposed person (PEP) status and adverse media screening results
- Records of regulatory correspondence and disclosures

4.4 Technical and Usage Data

- IP address, browser type and version, device identifiers, operating system
- Pages visited, time spent on the Website, referral source, and click-through data (via cookies and similar technologies — see our Cookie Policy)

4.5 Communications and Marketing Data

- Records of correspondence, meeting notes, and call recordings (where permitted and notified)
- Marketing preferences and subscription history

4.6 Special Category Data

We do not generally seek to collect special category data (such as health data, religious beliefs, or racial or ethnic origin). Where such data is incidentally provided to us, or is necessary for a specific purpose (for example, health information relevant to a power of attorney or vulnerability accommodation), we will only process it in accordance with Data Protection Law, typically with your explicit consent or where necessary to establish, exercise, or defend legal claims.

5. How We Use Your Personal Data and Our Legal Basis

We only use personal data where we have a valid legal basis to do so under Data Protection Law. The table below sets out our main processing activities and the legal basis relied upon.

Purpose	Examples	Legal Basis
Client and investor onboarding	Verifying identity, conducting KYC/AML checks, assessing suitability and appropriateness	Legal obligation; performance of a contract; legitimate interests (regulatory risk management)
Providing investment management and advisory services	Managing portfolios, executing transactions, reporting on performance	Performance of a contract; legitimate interests
Regulatory compliance	AML/CTF checks, sanctions screening, FATCA/CRS reporting, record-keeping, complaints handling	Legal obligation; legitimate interests
Communications	Responding to enquiries, sending account or transaction notices	Performance of a contract; legitimate interests
Marketing	Sending newsletters, event invitations, and fund updates	Consent (where required); legitimate interests (existing client relationships, subject to opt-out)
Website functionality and analytics	Operating the Website, understanding usage, improving content	Consent (non-essential cookies); legitimate interests (essential functionality)
Fraud prevention and security	Detecting and preventing fraud, unauthorised access, and financial crime	Legal obligation; legitimate interests
Recruitment	Assessing job applications	Performance of a contract (pre-contractual steps); legitimate interests

Where we rely on "legitimate interests", we have assessed that our interests (or those of a third party) are not overridden by your interests or fundamental rights and freedoms. You may ask us for further details of this balancing assessment at any time using the contact details in Section 2.

6. Automated Decision-Making and Profiling

We do not generally make decisions about you based solely on automated processing (including profiling) that produce legal or similarly significant effects. If this changes — for example, in relation to automated suitability screening or fraud detection — we will notify you and provide information about the logic involved, its significance, and your right to request human review.

7. Who We Share Your Personal Data With

We may share personal data with the following categories of recipients, always subject to appropriate confidentiality and data protection safeguards:

- Regulators and public authorities, including the FCA, HMRC, and law enforcement agencies, where legally required

- Custodians, fund administrators, transfer agents, and prime brokers involved in executing and settling transactions
- Professional advisers, including legal counsel, auditors, and tax advisers
- Due diligence and identity verification providers, including sanctions and PEP screening providers
- IT, cloud hosting, and data analytics service providers who process data on our behalf under contract
- Group companies and affiliates of Landseer, where relevant to service delivery
- Any actual or prospective purchaser in connection with a merger, acquisition, or reorganisation of our business

We do not sell personal data to third parties. Third-party service providers who process personal data on our behalf act only on our documented instructions and are bound by contractual data protection and confidentiality obligations consistent with Article 28 GDPR.

8. International Transfers

Some of our service providers and group entities may be located outside the UK or the European Economic Area (EEA). Where we transfer personal data internationally, we ensure an adequate level of protection through one or more of the following safeguards:

- Transfers to countries subject to an adequacy decision by the UK Government or the European Commission
- The UK International Data Transfer Agreement (IDTA) or UK Addendum to the EU Standard Contractual Clauses
- The European Commission's Standard Contractual Clauses (SCCs), together with a transfer risk assessment
- Other safeguards recognised under Data Protection Law

You may request further information about, or a copy of, the safeguards we use for a specific transfer by contacting us using the details in Section 2.

9. Data Retention

We retain personal data only for as long as necessary to fulfil the purposes for which it was collected, including to satisfy legal, accounting, regulatory, or reporting requirements. As a general guide:

- Client and investor due diligence and transaction records: at least 5 years from the end of the business relationship, in line with FCA and AML record-keeping requirements
- Marketing preference data: until you withdraw consent or object, plus a reasonable period to record your request
- Website analytics and cookie data: as set out in our Cookie Policy
- Recruitment data: up to 12 months after the recruitment process concludes, unless you consent to longer retention

In some circumstances we may retain data for longer periods where required to comply with legal, regulatory, or professional obligations, or to establish, exercise, or defend legal claims.

10. Your Rights

Subject to certain conditions and exemptions under Data Protection Law, you have the following rights in relation to your personal data:

- Right of access — to obtain a copy of the personal data we hold about you
- Right to rectification — to have inaccurate or incomplete data corrected
- Right to erasure — to request deletion of your data in certain circumstances
- Right to restrict processing — to limit how we use your data in certain circumstances
- Right to data portability — to receive certain data in a structured, machine-readable format
- Right to object — to object to processing based on legitimate interests or for direct marketing purposes
- Right to withdraw consent — where processing is based on consent, at any time, without affecting prior lawful processing
- Rights related to automated decision-making — as described in Section 6

To exercise any of these rights, please contact us using the details in Section 2. We will respond within one month, extendable by a further two months for complex requests, as permitted by Data Protection Law. We may need to verify your identity before actioning a request.

You also have the right to lodge a complaint with the UK Information Commissioner's Office (ICO) at ico.org.uk or by telephone on 0303 123 1113, or with your local data protection authority if you are located in the EEA. We would, however, welcome the opportunity to address your concerns directly before you approach a regulator.

11. Cookies and Similar Technologies

Our Website uses cookies and similar technologies to operate effectively, remember your preferences, and gather anonymised analytics. Full details of the cookies we use, their purposes, and how to manage your preferences are set out in our separate Cookie Policy, available at [Cookie Policy URL].

12. How We Protect Your Data

We maintain appropriate technical and organisational measures designed to protect personal data against unauthorised access, alteration, disclosure, or destruction. These measures include encryption, access controls, staff training, and regular review of our information security practices, proportionate to the risk involved. In the event of a personal data breach that is likely to result in a risk to your rights and freedoms, we will notify the ICO and, where required, affected individuals, in accordance with Data Protection Law.

13. Children

Our Website and services are directed at adults and are not intended for individuals under the age of 18. We do not knowingly collect personal data from children.

14. Changes to This Policy

We may update this Policy from time to time to reflect changes in our practices, services, or legal requirements. The "Last updated" date at the top of this Policy indicates when it was last revised. Material changes will be notified to clients and investors in accordance with our contractual and regulatory obligations, and, where appropriate, highlighted on the Website.

15. Contact Us

If you have any questions, concerns, or requests regarding this Policy or our handling of your personal data, please contact:

Landseer Asset Management

4 Albemarle Street, Mayfair, London, W1S 4GA, England.

Email: clientservices@landseeram.com