# Privacy Policy

CrossBorder Capital Limited (“CBC”) acts as a data controller and/or data processor in respect of your Personal Data for the purposes of the European Union’s General Data Protection Regulation (“GDPR”). CBC is responsible for ensuring that it uses your Personal Data in compliance with GDPR.

All service providers appointed by CBC to process Personal Data (“Data Processors”) will process Personal Data provided in accordance with CBC’s instructions and CBC will act as the Data Controller of any such Personal Data.

This Privacy Notice applies to you if:

(i) you are a client or potential client of CBC;

(ii) you have requested to receive any CBC marketing material or research or data; and/or

(iii) you have given your Personal Data to CBC for any other purpose.

This Privacy Notice sets out the basis on which Personal Data about you will be processed by CBC. Please take the time to read and understand this Privacy Notice.

### Personal Data that can be used

The term “Personal Data” under the GDPR is defined as:

“any information relating to an identified or identifiable natural person ('Data Subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person”.

We might process the following Personal Data about you:

(a) Information provided by you: This might include your name and business address, email address, contact details, signature, job title. Such information might be provided in a contractual agreement or in other documents, face-to-face, by telephone, by email or otherwise.

(b) Information that we collect or generate: This might include information relating to your subscription to our research/advisory and/or data services, emails, call recordings and website usage data.

(c) Information that we obtain from other sources: This might include information obtained for the purpose of know-your-client procedures, information from public websites, other public sources and information received from any of your advisers or intermediaries.

### Uses of your Personal Data

Your personal data may be stored and processed by us for the following purposes:

(a) General business administration, including communicating with you, communicating with service providers on your behalf where necessary and any counterparties, accountancy and audit services, risk monitoring and administration of IT systems.

(b) Compliance with legal and regulatory obligations and industry standards, including know-your-client procedures, the automatic exchange of tax information and legal judgments.

(c) Providing CBC marketing materials or research or data as requested.

We are entitled to process your Personal Data in these ways for the following reasons:

(a) If you are a subscriber to CBC research and/or data services, you will enter into a service contract with CBC and some processing will be necessary for the performance of that contract or will be done at your request prior to entering into that contract.

(b) If you have requested a trial of CBC research and/or data services, some processing will be necessary for the performance of that trial.

(c) Processing may be necessary to discharge a relevant legal or regulatory obligation.

(d) The processing will, in all cases, be necessary for CBC’s legitimate business interests such as:

(i) carrying out CBC’s business activities, including research and/or data services and marketing;

(ii) ensuring compliance with all legal and regulatory obligations and industry standards, and preventing fraud;

(iii) establishing, exercising or defending legal rights or for other purposes relating to legal proceedings; and

(iv) ensuring the security of information systems.

(e) In respect of any processing of sensitive Personal Data falling within special categories, such as any Personal Data relating to political opinions of a politically exposed person, the processing will be necessary for reasons of substantial public interest.

### Disclosure of your Personal Data to third parties

We may from time to time, in accordance with the purposes described above, disclose your Personal Data to other parties, including our professional advisers such as law firms and accountancy firms,  other service providers, including technology service providers, counterparties and  courts and regulatory, tax and governmental authorities. These entities will process your Personal Data in accordance with our instructions and will themselves be responsible for their use of your Personal Data under GDPR.

### Transfers of your Personal Data outside the European Economic Area

Your Personal Data may, and only where necessary, be transferred to and stored by entities outside the European Economic Area (the “EEA”), such as service providers to CBC.

Where Personal Data is transferred outside the EEA, we will ensure that the transfer is subject to appropriate safeguards or is otherwise permitted under applicable law. For example, the country to which the Personal Data is transferred may be approved by the European Commission, the recipient may have agreed to model contractual clauses approved by the European Commission that oblige them to protect the Personal Data, or the recipient may be located in the United States and be a certified member of the EU-US Privacy Shield scheme.

You can obtain more details of the protection given to your Personal Data if it is transferred outside the EEA, including a copy of any standard data protection clauses entered into with recipients of your Personal Data, by contacting us using the details set out below.

### Retention of Personal Data

How long we hold your Personal Data for will vary. The retention period will be determined by various criteria, including the purposes for which we are using it (as it will need to be kept for as long as is necessary for any of those purposes) and legal obligations (as laws or regulations may set a minimum period for which we have to keep your Personal Data).

### Your rights

You have a number of legal rights in relation to the Personal Data that we hold about you. These rights include the following:

(a) The right to obtain information regarding the processing of your Personal Data and access to the Personal Data that we hold about you.

(b) In some circumstances, the right to receive some Personal Data in a structured, commonly used and machine-readable format and the right to request that we transmit that data to a third party where this is technically feasible. Please note that this right only applies to Personal Data which you have provided to CBC.

(c) The right to request that we rectify your Personal Data if it is inaccurate or incomplete.

(d) The right to request that we remove or erase your Personal Data in certain circumstances. Please note that there may be circumstances where you ask us to remove or erase your Personal Data but we may still be legally required to retain it.

(e) The right to object to, and the right to request that we restrict our processing of your Personal Data in certain circumstances. Again, there may be circumstances where you object to, or ask us to restrict our processing of your Personal Data but we will remain legally required to continue processing your Personal Data or may even have to refuse that request.

(f) The right to lodge a complaint with the data protection regulator (details of which are provided below) if you think that any of your rights have been infringed by us.

You can exercise your rights by contacting us using the details set out under “Contacting Us” below. You can find out more information about your rights by contacting an EU data regulator such as the UK’s Information Commissioner’s Office, or by searching their website at [ico.org.uk](https://ico.org.uk/).

### Cookies

CBC also uses cookies. A "cookie" is a type of message given to a web browser by a web server. CBC can use 3 types of cookies:

(1) A session cookie to help you navigate to the appropriate part of CBC's website for the jurisdiction in which you are located: this is temporary and will be removed at the end of your session.

(2) A persistent cookie if you click on "remember me" to enable you to customise your use of the website: this will be stored on your computer's hard drive until it automatically expires after 30 days or until you delete it.

(3) A persistent cookie to collect non-personal data for Google Analytic reports about your use of the website: this is stored on your computer's hard drive until it expires or until you delete it. By clicking on the acceptance box you hereby give your consent to CBC using these cookies. If you require any help with how to delete cookies, please contact CBC's Client Services team.

### Contacting Us

If you would like further information on the collection, use, disclosure, transfer or processing of your Personal Data or the exercise by us of any of the rights listed above, please address questions and requests to: [information](mailto:privacy@odey.com)@crossbordercapital.com or call us on 020 3954 3430