Privacy Notice for Fund Investors and Prospective Clients or Investors

About this notice

The Data Protection Act 2018 ("DPA") and the UK General Data Protection Regulation ("UK GDPR") provide a framework for UK data protection legislation following the exit of the UK from the EU. Guernsey's current data protection legislation has been enacted to mirror GDPR and is set out in The Data Protection (Bailiwick of Guernsey) Law, 2017, as amended (the "DP Law"). In addition, as U.S Regulated Investment Advisers, Longview Partners complies with Regulation S-P: Privacy of Consumer Financial Information and Safeguarding Personal Information, which governs the privacy and safeguarding of consumer financial information ("Regulation S-P"). This policy also operates alongside Longview's data protection complaints handling obligations.

This Privacy Notice is intended to ensure that existing or prospective fund investors, prospective clients or similar contacts or, where the existing or prospective fund investor, prospective client or other similar contact is not an individual, the existing or prospective fund investor's, prospective client's or similar contact's individual directors, officers, employees and/or owners ("**you**", or "**your**") are aware of the categories of your personal data Longview Partners (Guernsey) Limited and Longview Partners LLP ("**we**", "**us**" or "**our**") may collect, how we collect it, what we use it for and with whom we share it in accordance with applicable data protection legislation. Where the existing or prospective fund investor, prospective client or similar contact is not an individual, please provide a copy of this Privacy Notice to those individual directors, officers, employees and/or owners whose personal data we may process.

"Personal data" means any information relating to you but does not include data where you can no longer be identified from it such as anonymised aggregated data.

We will be joint data controllers in respect of your relationship with us as an existing or prospective fund investor, a prospective client or a similar contact. A data controller is responsible for deciding how to hold and use personal data about you. We may process your personal data ourselves or through others acting as data processors on our behalf.

Where you are an existing fund investor the fund will be a data controller in respect of your investment in the fund and you will receive a separate privacy notice from the fund setting out how your personal data is used by the fund.

We may provide supplemental privacy notices on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your personal data. These supplemental notices should be read together with this Privacy Notice.

If you have any questions about this Privacy Notice you can contact clientservices@longview-partners.com.

What information do we collect about you and what do we use it for?

Personal data held by us or on our behalf may include, but is not necessarily limited to, your name, residential address, place of business, email address, other contact details, corporate contact information, signature, regulatory status, correspondence records, details relating to your investment activity or preferences.

The purposes for which we may collect, store, and use personal data about you and our 'lawful basis' for processing such data are set out in the table below. The law specifies certain 'lawful bases' for which we are allowed to use your personal data.

Purpose	Lawful basis for processing
To undertake pre-investment steps including but not limited to: — determining your eligibility to invest; — required due diligence; and — ascertaining your investment preferences	In order to take steps prior to the contract between you and us/the fund in which you may invest, compliance with applicable legal obligations and our legitimate interests in establishing your preferred investment strategies and complying with our legal and regulatory obligations.
To undertake business development and marketing activities in relation to making suggestions and recommendations to you about our product or service.	Our legitimate interests in promoting our products and services and growing our business.
Corresponding with third parties such as service providers, legal advisors, auditors and technology providers and regulatory authorities to comply with any legal obligation imposed on us or in order to pursue our legitimate business interests.	Compliance with applicable legal obligations. Our legitimate interests in conducting our business in a proper manner and complying with our legal and regulatory obligations.
To maintain our records.	Our legitimate interests in conducting our business in a proper manner.
Where you are an existing fund investor, the provision of periodic reporting.	Our legitimate interests in maintaining relations with our existing fund investors.

In addition to the uses above, please note that we may also process your information where we are required by law to do so or if we reasonably believe that it is necessary to protect our rights and/or to comply with judicial or regulatory proceedings, a court order or other legal process.

Special categories of personal data

There are more limited bases for processing special category personal data. This is personal data which reveals or contains racial or ethnic origin, political opinions, religious and philosophical beliefs, trade union membership, genetic data, biometric data, health data, sex life and sexual orientation.

We do not intend to actively collect special category data about you. Whilst we will use reasonable efforts to limit our holding of such data, please be aware that we may hold such data incidentally. For example, where:

- you volunteer special category data to us or one of our processors, such as if you send us an email containing special category data;
- documents gathered for legal/regulatory purposes contain special category data, such as a due diligence search from public sources which includes special category data.

Should any such data unwittingly come into our possession we will immediately delete it once identified.

What if you do not provide the personal data requested?
Unless and until you make a decision to enter into a relationship with us whereby we manage a segregated account on your behalf (at which point we will send you a copy of any relevant privacy notice) you are not required to provide us with any information.

Change of purpose
We will only use your personal data for the purposes for which we collected it (as identified above in the *'Purpose'* column), unless we reasonably consider that we need to use it for another reason which is compatible with the original purpose. If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

How do we collect this information?

We typically collect personal data about you when you provide information to us when communicating with us in writing, electronically, or by phone. For instance, when you request product documentation, forms of literature from us, or otherwise correspond with us.

In addition, we may receive personal information about you from third parties, such as:

- public sources or information vendors;
- your legal, financial, tax, or other professional advisers;
- your consultant.

With whom will we share your information?

We may share your personal data with a third party for the purposes described above where this is required by law, where it is necessary in order to take steps prior to the contract between you and us, prior to your subscription into the fund, or where we have another legitimate interest in doing so.

We may need to share your personal data with:

- other entities within our group as part of our regular reporting activities in company performance, in the context of a business reorganisation or group restructuring exercise or for assistance in relation to marketing and business development;
- regulators;

- in the case of certain existing fund investors, tax authorities; and
- any of our service providers where such information is relevant to their performance of such services;

We may share your personal data with third parties, for example in the context of the possible sale or restructuring of the business. We may also need to share your personal data with a regulator or to otherwise comply with applicable law or judicial process or if we reasonably believe that disclosure is necessary to protect our rights and/or to comply with judicial or regulatory proceedings, a court order or other legal process.

International Transfers

As Longview Partners (Guernsey) Limited is domiciled in Guernsey and Longview Partners LLP is domiciled in the UK, any personal data that we collect about you will be processed in Guernsey and the UK in order for us to perform our contract with you and/or otherwise correspond with you or provide the information you have requested. Guernsey, the UK, and EEA countries are recognized as having equivalent standards of data protection to the EU GDPR.

We may transfer the personal data we collect about you to Canada because this is the location of our email archiving solution. Canada has been recognised by the European Commission as an "adequate" country in respect of data protection laws, meaning its privacy protection is "essentially equivalent" to EU GDPR. If you require further information about the transfer of personal data to Canada, you can request it from clientservices@longview-partners.com.

Longview does not transfer personal data to countries outside the EEA, the UK, Guernsey, and Canada.

How long will we retain your information?

We will retain your personal data for as long as necessary to fulfil the purposes for which it was collected, including for the purposes of satisfying any legal, regulatory, accounting or reporting requirements and our legitimate interests in maintaining such personal information in our records. This will normally include any period during which we are dealing or expect to deal with you and what we consider to be a suitable period thereafter for our internal record-keeping purposes. In doing this we will have regard to 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. Generally, we will keep information relevant to our dealings with you for at least seven years following the last date of activity.

After the relevant retention period has expired, personal data may be permanently deleted in accordance with the terms of the Records Retention Policy.

Accuracy of information

It is important that the personal data we hold about you is accurate and current. Please let us know if the information to which your personal data relates should change during your relationship with us.

Your rights in relation to your information

You have rights as an individual which you can exercise in relation to the information, we hold about you under certain circumstances. These rights are to:

- request **access** to your personal data (commonly known as a "data subject access request") and request certain information in relation to its processing;
- request **rectification** of your personal data;
- request the **erasure** of your personal data;
- request the **restriction** of processing of your personal data;
- **object** to the processing of your personal data;
- request the **transfer** of your personal data to another party.

If you want to exercise one of these rights, please contact us at clientservices@longview-partners.com. You also have the right to make a complaint at any time to a supervisory authority for data protection issues.

Fees
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 should we deem your request for access to be manifestly unfounded or excessive. Alternatively, we may refuse to comply with the request if the request is found to be manifestly unfounded or excessive.

What we may need from you
We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal data is not disclosed to any person who has no right to receive it.

Right to withdraw consent

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal data for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact clientservices@longview-partners.com. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose(s) to which you originally consented unless we now have an alternative legal basis for doing so.

Data protection complaints

Individuals have the right to complain where they consider that Longview has infringed data protection legislation in the processing of their personal data.

A data protection complaint may relate to, without limitation:

- the collection, use, accuracy, retention or security of personal data;
- the handling of a personal data breach (whether or not reportable); or
- the handling of a subject access request or any other data subject right.

Longview will accept data protection complaints made through any channel, including written, electronic or verbal communications made to any member of staff. Any member of staff who receives a data protection complaint must escalate it promptly to the Data Protection Point of Contact ("DPPC").

Individuals may raise concerns directly with the Information Commissioner's Office (ICO). However, Longview encourages individuals to raise data protection complaints with the Firm in the first instance so that concerns can be addressed promptly and efficiently. Where the ICO contacts Longview in relation to a data protection complaint, the DPPC shall coordinate Longview's response and ensure that relevant records are made available as required.

Changes to this privacy notice

We reserve the right to update this Privacy Notice at any time, and we will make an updated copy of such Privacy Notice available to you and notify you when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal data.

Further information

This Privacy Notice was written with brevity and clarity in mind and is not an exhaustive account of all aspects of our collection and use of personal data. If you require any further information, please do not hesitate to contact clientservices@longview-partners.com.

Longview Partners (Guernsey) Limited is licensed and regulated by the Guernsey Financial Services Commission.
Longview Partners LLP is authorised and regulated in the UK by the Financial Conduct Authority.
Longview Partners (Guernsey) Limited and Longview Partners LLP are each registered in the US with the Securities and Exchange Commission.

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