

Privacy Notice

We respect your trust in us to use, store and share your information. This Privacy Notice explains how Ashburton Investments (International) collects, uses and discloses your personal data, and your rights in relation to the personal data that we hold.

In this Privacy Notice, “us”, “we” and “our” refers to Ashburton Investments (International) which comprises of companies that are incorporated and operating in and from either Jersey, the UK or Luxembourg.

There are different Data Controllers of your personal information according to which Ashburton Investments (International) product or service is provided to you, or, the jurisdiction that your business contact is based. These are set out at the end of this Notice and we confirm that each Data Controller is subject to the Data Protection (Jersey) Law 2018, the EU General Data Protection Regulation (“GDPR”) or the UK Data Protection Act 2018 (as applicable to the jurisdiction(s) within which the Data Controller is incorporated and operating).

Ashburton Investments (International) has created a Data Protection Office whose contact details are set out in this Notice.

We may amend this Privacy Notice from time to time to reflect any changes in the way that we process your personal data. Data Protection laws allow us to use personal information only if we have a proper reason to do so. The laws say we must have one or more of these reasons:

- To fulfil a contract we have with you, or
- When it is our legal duty, or
- When it is in our legitimate interest, or
- When you consent to it. You can withdraw your consent at any time by contacting us. If you withdraw your consent we may not be able to provide our services to you.

Your rights

You have a number of rights in relation to the information that we hold about you which are set out below.

- To obtain access to, and copies of, the personal data that we hold about you;
- To require that we cease processing your personal data if the processing is causing you damage or distress;
- To require us to erase your personal data (your right to be forgotten);
- To require us to restrict our data processing activities;
- To receive from us the personal data we hold about you which you have provided to us, in a reasonable format specified by you, including for the purpose of you transmitting that personal data to another data controller; and
- To require us to correct the personal data we hold about you if it is incorrect.

However, there may be situations where we continue to hold and process information about you if there is a legitimate reason for us doing so, for example: to continue to administer or manage your investments or to comply with our own legal or regulatory obligations.

You can find out more about your rights under data protection legislation from the Office of the Information Commissioner at www.oicjersey.org (re the Jersey companies) or the Information Commissioner’s Office at www.ico.org.uk (re FirstRand UK Limited).

If you have any questions about how we use your personal data, or you wish to exercise any of the rights set out above, please contact our Data Protection Office using any of the following:

- ✉ PO Box 239, IFC1, The Esplanade, St Helier, Jersey, JE4 8SJ
- @ ashburtondataprotectionoffice@ashburton.com
- ☎ +44 1534 512000

If you are not satisfied with how we are processing your personal data, you can make a complaint to Jersey’s Office of the Information Commissioner at www.oicjersey.org or the UK Information Commissioner’s Office at www.ico.org.uk, as appropriate.

How we collect your data

We may collect your personal data in a number of ways, for example:

- From the information you provide to us when you meet with one of our employees;
- When you communicate with us or when we communicate with you by mail, telephone, email or other forms of electronic communication, including identifiers assigned to your computer or other internet connected device including your Internet Protocol (IP) address. In this respect, we may monitor, record and store any such communication;
- Information you have provided within client application forms, investment services agreements or terms of business documents relating to an Ashburton Investments (International) product or service set up for your benefit by you, or another person on your behalf
- From other companies in our Group;
- From your agents or advisers;
- From publicly available sources or from third parties where we need to conduct background checks about you.

The categories of the data we may collect

We may collect the following categories of personal data about you:

- Your name, date of birth, passport or national identity card details;
- Country of birth, domicile and citizenship;
- Gender and marital status;
- Contact information such as residential or business address, email address and telephone number;
- Information relating to your tax affairs including tax identification or national insurance number;
- Information about your employment, family and personal circumstances;
- Information about your knowledge and experience in the investment field;
- An understanding of your goals and objectives in connection with your wealth;
- Information relating to your financial situation such as income, expenditure, assets and liabilities, sources of wealth and your bank account details; and
- Information to assess whether you may represent a money laundering and terrorist financing risk, for example, whether you are a Politically Exposed Person, or have had previous criminal convictions or regulatory sanctions imposed.

The basis for processing your data without your consent and who we share it with

We may process your personal data because it is necessary for the performance of a contract to deliver the products or services you have engaged us for, or in order to take steps at your request prior to entering into a contract. We may also process your data for our compliance with a legal or regulatory obligation which applies to us.

We may use your personal data for the following:

- To prepare preliminary information or a proposal for you regarding the products and investment services we offer;
- For the performance of a contract between us to provide you with the products and services as set out in our terms in our application forms, investment services agreements or terms of business with you or as otherwise agreed with you from time to time;
- For the management and administration of our business;
- Seeking advice on our rights and obligations, such as where we require our own legal advice;
- For any other purpose for which you provide us with your personal data.
- To meet our compliance and regulatory obligations, such as compliance with anti-money laundering and countering terrorist financing regulations and tax reporting;
- Protecting the vital interests of you or others;
- Our legitimate interests.

We may share your personal data with the following:

- Your agents, trustees, advisers, or intermediaries,
- Brokers, custodians of your assets, banks and third party administrators who we may engage to assist in delivering the services to you;
- Our advisers where it is necessary for us to obtain their advice or assistance;
- Companies within our Group;
- Payment processors where we are making payments to you;
- Our auditors where it is necessary as part of their auditing functions;
- With third parties who assist us in conducting background checks about you;
- With relevant regulators, tax authorities and law enforcement agencies where we are required to do so;
- Our data storage providers.

Transferring of data

To help us provide our products and services to you, we may transfer your personal information outside the European Economic Area (EEA) to countries that may not have the same level of protection for personal information as Jersey, the UK and the EEA. When we do this, we expect the same standard of data protection is applied to ensure your rights are protected.

Retention of data

We have various security measures in place to keep your information safe and secure and we require our employees and any third parties who carry out any work on our behalf to comply with appropriate data protection standards.

We may retain your personal data for a period of 10 years after the termination of our contractual relationship with you in order to meet our regulatory and legal obligations. In other circumstances, we will retain information collected about you for as long as permitted for legitimate business purposes.

Data Controllers

Ashburton Fund Product, Investment Service Provider or Business Contact	Data Controller	Jurisdiction
Chindia Equity Fund	Ashburton Emerging Markets Funds Limited	Jersey
Sterling Asset Management Fund Dollar Asset Management Fund Euro Asset Management Fund Global Defensive Feeder Fund Global Balanced Feeder Fund Global Growth Feeder Fund	Ashburton Replica Portfolio Limited	Jersey
Diversified Cash Fund (GBP) Diversified Cash Fund (USD) Sterling Money Market Feeder Fund Dollar Money Market Feeder Fund	Ashburton Money Market Funds Limited	Jersey
Global Growth Dollar Feeder Fund Global Strategy Fund	Ashburton Global Investment Funds Limited	Jersey
Discretionary Investment Managed Portfolios	Ashburton (Jersey) Limited	Jersey
FNB International Private Clients Investment Advisory Service	Ashburton (Jersey) Limited	Jersey
Global Leaders Equity Fund India Fixed Income Opportunities Fund Global Balanced Fund Global Defensive Fund Global Growth Fund	Ashburton (Jersey) Limited; and Ashburton Investments SICAV*	Jersey Luxembourg*
Ashburton Investments International Business Development Team - London	FirstRand UK Limited	UK

*Ashburton Investments SICAV is not subject to Jersey or UK Law but to the Grand Duchy of Luxembourg Law of 2 August 2002 on the protection of persons with regard to the processing of personal data as amended, and to GDPR. Full details are set out in the Ashburton Investments SICAV Prospectus.