



Arion Investment Management Limited

Client Privacy Notice

August 2018

Arion Investment Management Limited
18 Shepherd Market, Mayfair
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info@arioninvestmentmanagement.com

Arion Investment Management Limited, registered in England and Wales, registered number 9954672, registered office 253 Gray's Inn Road, London WC1X 8QT. Arion Investment Management Limited is authorised and regulated by the Financial Conduct Authority (Registered no. 742037). Registered with the U.S. Commodity Futures Trading Commission (CFTC) as a Commodity Pool Operator and Commodity Trading Advisor and member of the National Futures Association (NFA).

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1 Our Commitment to you

Arion Investment Management Limited (“Arion”) are committed to ensuring the security and protection of the personal information that we process, and to provide a compliant and consistent approach to data protection. We have always had a robust and effective data protection program in place which complies with existing law and abides by the data protection principles. However, we recognise our obligations in updating and expanding this program to meet the demands of the GDPR.

2 The personal Information we collect, and why we collect

Information you give us. This is information about you that you provide to us by filling in forms or by corresponding with us by phone, electronic mail or otherwise. It may include basic personal information such as your name, address, e-mail address, phone number, title, and company. Arion may request more sensitive information from you such as financial information, social security and other government identification numbers where it is appropriate or necessary for conducting business.

Information we collect about you. Arion may also supplement the personal information you provide with information we receive from third parties, including our business partners, contractors, analytics and other service providers. In order to be compliant with statutory regulation we need to carry out Know Your Client checks. We use third parties to perform the checks and keep confirmation on our permanent file to be provided as evidence that we have carried out the necessary procedures, and have considered the risk assessment, as proof of our compliance with legislation.

We process the personal data for certain legitimate reasons, among other things, to help us improve the overall accuracy of the information and its completeness, to help us better tailor our interactions with you, and to help us identify and prevent fraud.

3 How We Use Your Personal Information

Arion uses, stores and processes the personal information we collect to provide you with: information, products and services which you request from us; details of similar products or services which you have already requested; for the prevention of financial crime; and to monitor and improve our existing services.

When you contact Arion, we may keep a record of your communication to help solve any issues that you might be facing. Depending on the country in which you live, your information may be retained for a reasonable time for use in future contact with you, or for future improvements to Arion services.

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Arion may also use or disclose your personal information when Arion believes, in good faith, that such use or disclosure is reasonably necessary to (i) comply with law, (ii) enforce or apply the terms of any of our user agreements, or (iii) protect the rights, property or safety of Arion, Arion's users, or others. Arion reserves the right to transfer and disclose your information, on an anonymised basis if Arion becomes involved in a business divestiture, change of control, sale, merger, or acquisition of all or a part of its business.

4 How We Share Your Personal Information

Arion may share personal information we collect about you with our affiliates, business partners, service providers, subsidiaries, vendors, consultants and other service providers to perform work on our behalf. The information may be shared with third parties to offer or provide related services according to agreements signed with Arion.

Arion may share your information in response to a request for information, if upon review, we determine that disclosure is in accordance with, or required by, any applicable law, regulation or legal process.

We may share your information if we determine that your actions are inconsistent with our user agreements or policies, or if we must protect the rights, property and safety of Arion or others.

Arion may share your personal information in connection with or during negotiations of any merger, sale of company assets, financing or acquisition of all or a portion of our business by another company.

Whenever we share your data with anyone we will only do so after satisfying ourselves that there is a legitimate reason for doing so and except in the case of governmental or regulatory organisations over which we have no control, that the persons with whom we have shared your data have appropriate controls over your data.

5 International Data Transfers

In the situations when Arion stores or transfers personal information outside the EU, we have robust procedures and safeguarding measures in place to secure, encrypt and maintain the integrity of the data. Our procedures include a continual review of the countries with sufficient adequacy decisions, as well as provisions for binding corporate rules; standard data protection clauses or approved codes of conduct for those countries without. We carry out strict due diligence checks with all recipients of personal data to assess and verify that they

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have appropriate safeguards in place to protect the information, ensure enforceable data subject rights and have effective legal remedies for data subjects where applicable.

6 How We Protect Your Personal Information

The security of your personal information is important to us. We use reasonable physical, electronic and procedural safeguards to protect the personal information we collect. Arion uses reasonable measures to safeguard personally identifiable information from loss, theft, misuse, alteration and unauthorized access or destruction. In addition, we maintain appropriate physical, electronic, and procedural safeguards to protect your personal data, including:

- Restricting access to personal data to our employees or service providers on a “need to know” basis;
- Enforcing policies and procedures for our employees in their handling of personal data; and
- Using technologies designed to safeguard data during its transmission, such as SSL encryption for the data you provide and using appropriate security to safeguard the data that we have received.

Arion also employs industry-standard measures and processes for detecting and responding to inappropriate attempts to breach our systems.

There is, however, no method of transmission over the Internet, or method of electronic storage that can be 100% secure. Therefore, Arion cannot guarantee the absolute security of your information. The Internet by its nature is a public forum, and Arion encourages you to use caution when disclosing information online. Often, you are in the best situation to protect yourself online. You are responsible for protecting your username and password from third party access, and for selecting passwords that are secure.

7 How We Monitor and Enforce

Arion regularly reviews our compliance with our Privacy Notice. If we receive formal written complaints, we will follow up with the person making the complaint. We work with the appropriate regulatory authorities to resolve any complaints that cannot be resolved directly.

8 Your Rights

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8.1 Right to be informed

Customers have the right to be informed about the collection and use of their personal data. This is achieved by means of this Privacy Notice.

8.2 Right of Access

You have the right to access and review the personal data stored by us to confirm its accuracy, and if necessary you may request that personal data is updated if it is inaccurate. You may also request that certain personal data be deleted from our files.

Arion will make reasonable efforts to comply with such requests within 30 days period and free of charge, unless such requests are prohibited by law, or there is a legitimate business purpose to retain personal data. We reserve the right to verify your identity before any request to update or delete your personal data is processed by us. Please direct any questions about your personal data to our data protection officer using the contact details set out in this notice by sending subject access request form.

8.3 Right of Rectification

You have the right to require us to rectify any errors in the data we hold about you.

8.4 Right to be erasure (right to be forgotten)

This right is not an absolute right and if you request the right to erasure and we are not able to fully comply with your request we will inform you of the reasons why we are not able to fully comply.

8.5 Right to Data portability

You have the right to ask us to collect all the data we hold about you and transfer it to a new provider in a machine-readable form. We do not think this will be applicable for the types of data that we hold.

8.6 Right to restrict processing

You have the right to ask us not to process your data/object to processing:

- processing based on legitimate interests or the performance of a task in the public interest/exercise of official authority (including profiling);
- direct marketing (including profiling); or
- processing for purposes of scientific/historical research and statistics.

If you exercise this right we will stop processing the personal data unless:

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- we can demonstrate compelling legitimate grounds for the processing, which override the interests, rights and freedoms of the individual; or
- the processing is for the establishment, exercise or defence of legal claims.

8.7 Right to object

You have the right to object to the processing of your personal data in certain circumstances. You have the absolute right to stop your data being used for direct marketing.

8.8 Rights related to automated decision making including profiling

This is not applicable as we do not engage in these activities.

9 Complaints

If you wish to raise a complaint on how we have handled your personal data, you can contact our Data Protection Officer who will investigate the matter. If you are not satisfied with our response or believe we are processing your personal data not in accordance with the law you can complain to the Information Commissioner's Office (ICO). Our Data Protection Officer's contact details are set out below.

10 Changes to this privacy notice

Arion reserves the right to update or amend this privacy notice at any time, including where Arion intends to further process your personal information for a purpose other than that for which the personal information was collected or where we intend to process new types of personal information. We will issue you with a new privacy notice when we make significant updates or amendments. We may also notify you about the processing of your personal information in other ways.

11 How to Contact Us

If you have any questions regarding Arion's privacy practices, the use of your personal data, or about this Privacy Notice, please contact us at:

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12 Subject Access Request Form

Section 1 – Applicant Details

| | |
|-----------------------------|--|
| Title (please tick one): | Mr <input type="checkbox"/> Mrs <input type="checkbox"/> Miss <input type="checkbox"/> Ms <input type="checkbox"/> Title (please state): |
| Forename(s): | |
| Family Name: | |
| Previous Family Name: | |
| Other name(s) known by: | |
| Date of Birth (dd/mm/yyyy): |/...../..... |
| Official Gender: | Male <input type="checkbox"/> or Female <input type="checkbox"/> |
| Nationality: | |
| Current Address: | |
| | |
| | |
| | |
| Postcode | |
| Daytime Telephone No: | |
| Email Address: | |

Section 2 – Proof of the applicant’s identity

In order to prove the applicant’s identity, we need to see copies of two pieces of identification, one from list A and one from list B below. Please indicate which ones you are supplying.

Please DO NOT send an original passport, driving licence or identity card

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