
Privacy and Cookies Policy

GDPR Privacy Policy

November 2020



In this Policy, "Record", "we", "us" and "our", refer to Record Currency Management Limited, registered in the United Kingdom with registered office at Morgan House, Madeira Walk, Windsor, Berkshire SL4 1EP. Record Currency Management Limited's company registration number is 01710736.

Record is committed to safeguarding information provided to us by any third parties ("you") (including its clients, investors and all visitors to the website www.recordfg.com (the "Website")) from which any individual can be identified, such as names, contact details and ID data ("Personal Information"). To the extent that any Personal Information is collected, it will be held in confidence in accordance with the Data Protection Legislation (as defined below). Please read the following Privacy and Cookies Policy which explains how we use and protect your information.

We will only use Personal Information which is provided to us, or otherwise obtained by us, as set out in this Policy. We will ensure that your Personal Information is handled in accordance with the "Data Protection Legislation" (meaning any law applicable from time to time relating to the processing of Personal Information and/or privacy as the same may be re-enacted, applied, amended, superseded, repealed or consolidated, including without limitation the General Data Protection Regulation (EU) 2016/679, and the Privacy and Electronic Communications (EC Directive) Regulations 2003, in each case including any legally binding regulations, directions and orders issued from time to time under or in connection with any such law).

By visiting and/or contacting us through the Website (or otherwise engaging with us), you acknowledge that we may collect, use and transfer your Personal Information as set out in this Policy. Record reserves the right to change this Policy from time to time and you should therefore check this page frequently to ensure that you are happy with any changes.

For the purposes of the Data Protection Legislation, Record is deemed to be the "data controller" in respect of any Personal Information that you provide to us or we otherwise obtain about you.

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1. PERSONAL INFORMATION THAT WE COLLECT FROM YOU

When you engage with us (e.g. sending us emails, contacting us via telephone or visiting or making an enquiry through the Website), you may provide Personal Information about yourself including your name and work contact details (e.g. work address, email address and telephone number). Although you engage with us as a [professional or] representative of an institutional investor, we are still likely to receive some Personal Information from you (e.g. email address, tax information, investment history and/or bank details). Where you make use of our Website we may also collect information about your use of the Website (e.g. your IP address and choice of web browser). Some of this Personal Information is collected and processed so we can perform a contract with an institutional investor in which you are affiliated, some for the purpose of legal compliance and some for the purposes of our legitimate business interests (namely to carry out and improve our business, analyse the use of our Website and services and support our staff, clients and investors).

In order to comply with our legal obligations and for training purposes, we record all calls made on certain employees' landline and mobile telephone lines.

Where you provide Personal Information on behalf of another individual, you are responsible for notifying that individual that you have provided their Personal Information to us and directing them to this Policy so they can see how we will process their Personal Information.

2. PERSONAL INFORMATION THAT WE RECEIVE FROM OTHER SOURCES

We may receive information from third parties who collect Personal Information from you and pass it on to us. For example: (i) where we are conducting due diligence or deciding whether to acquire or invest in third parties we may also receive Personal Information concerning key personnel; (ii) where another individual makes an investment on your behalf, they may provide us with certain Personal Information to effect the transfer of the investment to you, such as your name and contact details; and (iii) your employer may provide your Personal Information to us in connection with a service they provide to us or in connection with services that we provide to our investors. Where this is the case the third party is responsible for informing you that they have shared your Personal Information with us, directing you to this Policy and obtaining any relevant consents from you to ensure you are happy with the ways in which your Personal Information will be shared. However, once we are holding it, we will only handle any person's Personal Information in accordance with this Policy.

3. SENSITIVE PERSONAL INFORMATION

"Sensitive Personal Information" (sometimes also called "special category" personal information) is particular types of Personal Information, for example information concerning an individual's race, ethnic origin, religious beliefs, health, political opinions or sexual orientation.

You may provide us with Sensitive Personal Information from time to time in connection with our provision of currency services or otherwise (for example, we may need to obtain information as to whether you are a politically exposed person as part of a "know your client" process or you may give us an indication of your religious beliefs in telling us your dietary requirements for an event). In such cases, the provision of this information is entirely voluntary, however, we may be unable to carry out some activities necessary to process your application, instructions or other requests without the provision of such information. For example, we may be unable to process application forms or similar requests. We will use any Sensitive Personal Information in accordance with the purpose for which it was (i.e. with your consent) and, where necessary, we may also process such information in the establishment, exercise or defence of legal claims.

Where we do receive Sensitive Personal Information, we will only keep such information for as long as strictly necessary in order to comply with our obligations under the law.

4. WHAT WE DO WITH YOUR PERSONAL INFORMATION

We will only use your Personal Information in order to (a) provide our services, (b) provide client or investor relations and support to an institutional client or investor with which you are affiliated, (c) improve our Website and services, (d) comply with our own legal and regulatory obligations, including in

relation to financial promotion, applicable anti-money laundering and counter terrorist financial legislation, the Common Reporting Standard and FATCA, and (e) for our internal business processes, including providing support to our staff.

Where you have explicitly consented at the time we collected your Personal Information or where we otherwise have a right to do so, we may also use your Personal Information to let you know about any of our services that may be of interest and/or inform you about important changes or developments to our services by email.

Where you or your employer (or any other entity you work for) provides services to us, you and/or they may provide us with some of your Personal Information in connection with the provision of the services, such as your name, business contact details and other ID information. We will only process such Personal Information in connection with the provision of the services (such as using your contact details to discuss the services) and in accordance with this Policy. In addition, where necessary, we may also share your Personal Information with our institutional investors or other third parties in order to provide our services (e.g. if you or your business provides investor administration services, we may share your business contact details with our investors so that they can contact you).

If you change your mind about us using your Personal Information in the ways described in this Policy, please let us know by contacting us at GDPRqueries@recordcm.com. You may also opt out of receiving marketing emails from us by following the instructions outlined in the email.

5. HOW WE SHARE YOUR PERSONAL INFORMATION

Where it is necessary for the performance of our contract with an institutional client or investor in which you are affiliated or for our internal business processes, we may share your Personal Information with counterparty banks, certain third parties, such as our professional advisers, service providers, regulatory bodies, auditors, technology providers and any duly authorised agents or related, associated or affiliated companies of the foregoing for the same purposes.

By submitting your Personal Information to us, you acknowledge that such third parties may receive and process your Personal Information. We ask all third parties to treat your Personal Information securely and in accordance with this Policy and will take reasonable steps to enforce this. We will never sell your data.

In addition, it may be necessary to disclose your Personal Information if we are under a duty to disclose your Personal Information in order to comply with any legal obligation (such as anti-money laundering or anti-terrorist financing obligations), carry out an internal investigation, enforce our Terms and Conditions on our Website and any other agreement, or protect the rights, property, or safety of Record, our Funds, our group companies and our clients, directors, employees or other personnel. This includes exchanging information with other companies and organisations for the purposes of fraud protection and prevention.

In exceptional circumstances, if we are sold or merged with another company we may disclose your information to a potential buyer, including your Personal Information and other information concerning your relationship with us, so that they can continue to provide the services you have requested.

6. OUR SECURITY MEASURES AND INFORMATION ABOUT WHEN WE DELETE DATA

We will only keep your Personal Information for as long as we reasonably require and, in any event, only for as long as the Data Protection Legislation allows.

Where you have chosen a password which allows you to access certain parts of the Website, such as the section entitled "Client Login" or "Investor Login", you are responsible for keeping this password confidential. We advise you not to share your password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure and, although we will take steps to protect your Personal Information, we cannot guarantee the security of your Personal Information transmitted via the Website; any transmission is therefore at your own risk.

Some of our premises use CCTV for the purpose of crime prevention, however, this is under the control of a third party and therefore you should consult any notices they display and their privacy statements for more information.

7. TRANSFERRING PERSONAL INFORMATION OUTSIDE OF THE EEA

Any Personal Information provided to Record will be transferred to and stored on Record's servers in the UK. We take steps to protect your Personal Information from unauthorised access and against unlawful processing, accidental loss, destruction and damage.

In processing your Personal Information, it will sometimes be necessary for us to transfer your Personal Information outside the European Economic Area ("EEA") to counterparty banks, our staff and our third-party service providers. It may also be accessed by staff operating outside the EEA who work for us or for one of our suppliers or group companies. This includes people engaged in, among other things, the provision of support services to us. We will take all steps reasonably necessary to ensure that your Personal Information is treated securely and in accordance with this Policy and the Data Protection Legislation when it is processed in, or otherwise accessed from, a location outside the EEA. This means that we will only transfer your Personal Information to our non-European offices and Funds and to third parties based outside the EEA if that party (a) is situated in a country that has been confirmed by the European Commission to provide adequate protection to Personal Information, (b) has agreed (by way of written contract incorporating the "model clauses" as approved by the European Commission or by some other form of data transfer mechanism approved by the European Commission) to provide all protections to your Personal Information as required by the Data Protection Legislation or (c) we have your explicit consent to do so (such as where you have requested a service from one of our Funds situated outside the EEA). Where any transfer takes place under a written contract, you have the right to request a copy of that contract and may do so by contacting us at GDPRqueries@recordcm.com. For the avoidance of doubt, in the event that the UK is no longer a part of the EEA, references in this paragraph to the EEA shall mean the EEA and the UK.

By submitting your Personal Information to us, you acknowledge this transfer, storing or processing of your Personal Information.

8. ACCESSING AND UPDATING YOUR PERSONAL INFORMATION

You have the right to ask us not to process your Personal Information for marketing or research purposes. If you have given us your express consent, or where we otherwise have the right to do so, we may use your Personal Information for marketing purposes. If we intend to disclose your Personal Information to any third party for marketing purposes, we will seek your explicit consent prior to any such transfer.

You are entitled to know some details about the Personal Information we hold about you and how that information is processed. If you would like to request this, please contact us at GDPRqueries@recordcm.com and we will provide you with the information to which you are entitled.

You can also ask us to: (a) make any changes to ensure that any Personal Information we hold about you is accurate and up to date; (b) erase or stop processing any Personal Information we hold about you where there is no longer a legal ground for us to hold it; or (c) in some circumstances, transfer any information we hold about you to a specified third party. If you wish to exercise any of these rights, please contact us at GDPRqueries@recordcm.com.

9. COMPLAINTS

Should you have any queries or complaints in relation to how we use your Personal Information, please contact us at GDPRqueries@recordcm.com. Should you wish to take any complaints or queries further, you have the right to contact the Information Commissioner's Office regarding such issues.

Our Website may, from time to time, contain links to and from third party websites. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these websites or their related policies. Please check these policies before you submit any Personal Information via these websites.

10. OUR USE OF COOKIES

A cookie is a small file that is sent to your browser from a web server and is stored on your computer. Cookies help us to analyse web traffic and identify which pages of our Website are being used. Our Website also uses cookies to respond to you as an individual so that it can tailor its operations to your needs by gathering and remembering information about your preferences as well as enabling you to login to and use the sections entitled "Client Login" and "Investor Login". We only use this information for statistical analysis purposes and then it is removed from our systems.

A cookie in no way gives us access to your computer or any information about you, other than information about how you use the Website and the Personal Information you choose to share with us (including Personal Information you automatically share with us by way of your browser settings).

In particular, we use the following cookies:

- a) **Strictly necessary cookies.** These cookies are essential in order to enable you to move around the Website and use its features, such as accessing secure areas.
- b) **Performance cookies.** These cookies collect information about how visitors use our Website, for instance which pages visitors go to most often and if they get error messages from the web pages. These cookies don't collect information that identifies a visitor; all information these cookies collect is aggregated and therefore anonymous. It is only used to improve how our Website works.
- c) **Functionality cookies.** These cookies are used to identify unique visitors to Websites. If you log in to the Websites, these are the cookies that allow us to remember who you are and what your preferences are so that we can provide you with access to pages personal to you, for example your account pages or your selected font size. These cookies can help to keep your visit to the site secure.
- d) **Session cookies.** These cookies allow us to identify your device as you use the Website, so that you are not treated as a new visitor each time you go to another part of the Website.

We may use banners and pop-ups from time to time to give you options around cookie use.

You can also manage cookie use via your browser settings (this will allow you to refuse the setting of all or some cookies) and your browser provider may ask you to confirm your settings. Note, however, that if you block all cookies (including essential cookies) via your browser settings you may not be able to access all or parts of our Website.

You can find more information about the specific cookies here: www.allaboutcookies.org.

11. CHANGES TO THIS PRIVACY AND COOKIES POLICY

Record may amend this Policy at any time without notice. By continuing to use the Website and making use of our services you acknowledge that we shall process your Personal Information in accordance with the updated Policy. If you are not happy with any changes that we make, you should not use or access (or continue to use or access) the Website and/or our services. Any changes to this Policy will be posted on the Website.

12. OUR CONTACT INFORMATION

If you have any questions (including relating to transfers of your Personal Information outside the EEA), please feel free to contact us by email at: GDPRqueries@recordcm.com.



record

Listen
Understand
Deliver

recordfg.com