



# Red Oak EU / UK Privacy Notice

Red Oak Compliance, and its affiliates (together, the “Company”, “us” or “we”) consider your privacy our utmost concern.

This privacy notice (the “Notice”) outlines the information we may collect about you and describes the basis on which we process your Personal Information, as defined by the European Union’s (“EU”) General Data Protection Regulation (“GDPR”) and other United Kingdom (“UK”) and European data privacy laws (the “Privacy Laws”). This Notice also gives information regarding the basis on which we process your Personal Information and your privacy rights under applicable Privacy Laws.

This Notice applies to all websites operated by us, as indicated on the relevant website (“Sites”).

This Notice is addressed to any natural person who is resident in the European Union and/or the UK who is any of the following: an investor or prospective investor in any fund or account managed or advised by the Company, a member, distributor, sales representative, business affiliate, or other representative of any client or prospective client of the Company, a Site user, a business contact working with service providers and vendors, or an individual on a Company mailing list (“you”) whose Personal Information the Company collects, controls and processes in the conduct of its business.

## 1. Collection of Personal Information

Our primary goal in collecting Personal Information from you is to effectively conduct business with our business partners and when applicable provide services and features to our clients, investors and potential clients and investors. You may make a data request by contacting us at:

<https://www.redoakcompliance.com/contact/>

## 2. Types of Personal Information held and its use

### 2.1 Customer services and administration

The Company may, in the conduct of our business, obtain Personal Information about you that may include, subject to the type of business or service relationship we have with you, without limitation:

- Contact information (e.g., your full name, business and/or home mailing address, telephone number, business and/or personal email address, job title);
- Identification information (e.g., date of birth, social security number, tax or other identification numbers and documents);
- Financial Information (e.g., documents and information about your income, account transactions and holdings with us);
- Browsing Information (e.g., Internet Protocol (or IP) address, browser language and type, domain name, operating system, location data, resources that you access).

In the course of our business, we may collect Personal Information about you from sources including, but not limited to:



- We receive information from you, your application, subscription or other forms or material completed or supplied by an actual or prospective client of the Company or a third party;
- Other written, electronic or verbal correspondence which relates to the business activities by or on behalf of an actual or prospective client of the Company;
- Information we receive from you when subscribing to a Company mailing list;
- Information we receive from security footage recorded for safety and security purposes when visiting Company premises; and
- Information we automatically collect from Company Sites by using cookies and other online tracking technologies.

We process your Personal Information to fulfill our contractual obligations, our statutory obligations and/or the legitimate interests of the Company and for other purposes for which the Company has a lawful basis under the Privacy Laws, including:

- To administer and deliver to you the products and/or services you have requested;
- For purposes of reporting to, or communicating with, actual or prospective clients of the Company or third parties or the appointment or engagement of the Company consistent with our obligations to such Company clients;
- To retain records of our business transactions and communications;
- For compliance with legal and regulatory requirements such as regulations aimed at prevention of money laundering or terrorist financing or other “Know your Client” requirements;
- To verify the status and/or eligibility of an actual or prospective client of the Company for services offered by the Company and for compliance with tax reporting requirements;
- Due diligence or monitoring activities of counter-parties;
- In connection with litigation, investigations, regulatory or governmental enquiries or for other legal or regulatory purposes involving the Company or the clients of the Company;
- To enable us to respond to certain requests by you such as access requests, scheduling of meetings or similar requirements;
- To operate our Sites efficiently and improve our service to you; and
- For other legitimate business interests.

We will endeavor to keep your information accurate and up to date and not keep it for longer than is necessary. We are required to retain information in accordance with the law, such as information needed for income tax and audit purposes. How long certain kinds of Personal Information should be kept may also be governed by specific business-sector requirements and agreed practices. Personal Information may be held in addition to these periods depending on individual business needs.

## **2.2 Monitoring use of our Sites**

We collect, process, and use Personal Information on our Sites through the use of cookies in order to offer a better, more tailored overall client experience, better adapt our business processes to our clients’ needs, and provide access to relevant product information and online applications. Please see Section 3 below for more information on cookies and similar technologies.



## **2.3 Marketing**

The Company collects certain information that you provide to us when subscribing to a Company mailing list, which may include your name, email address and other contact details.

Some of your Personal Information collected, in accordance with this Notice, may be used by us and third party service providers to contact you by email, fax, telephone and/or post for sending information or promotional material on our products and/or services and/or those of the Company.

In addition, we may process your Personal Information in order to communicate with you for marketing purposes. In this event, we may provide additional information that we believe may be of interest, including about services, news updates, research or market commentary, conferences, or events offered by or in conjunction with the Company.

We give you the opportunity to opt-out of receiving marketing communications and may in certain circumstances need to obtain your consent before sending such communications to you. Further detail can be found in each marketing communication sent by us.

**Email Tracking:** So that we can better understand our users' needs, we track responses to our emails - for example, to see which links are the most popular in newsletters, and to log and follow up responses to our marketing messages. To do this, we use small image files that are placed within the body of our email messages. They enable us to tell if a message has been opened and to track click-through's on links within the message.

## **3. Cookies**

We use cookies on our Sites to provide Site visitors with a better user experience when they browse our Sites. It also enables us to improve our Sites. If you use one of our Sites, and through your consent to the pop up that appeared on your first visit to such Site, you agree to the use of cookies in accordance with this Notice.

A cookie is a small text file that we store on the browser or the hard drive of your desktop, tablet or smartphone when you first visit our Sites. The cookie will help our Sites, or another website, recognize your desktop, tablet or smartphone the next time you visit. A cookie can contain Personal Information.

Cookies may be required to operate our Sites, allow us to recognize and count the number of visitors and to see how visitors move around our Sites, which may help us improve the design of our Sites. Cookies may also recognize you when you return to our Sites, enabling us to personalize our content and remember your preferences, and may be used to record your visit to our Sites, the pages you visited and the links you followed. We may use this information to provide you with targeted advertising and content we think you will be interested in. In some cases, we may use information from third party cookies to help us with market research or improving the design of our Sites (for example, where traffic to our Sites comes from).

You can block cookies by activating the setting on your browser that allows you to refuse all, or some, cookies. If you block all cookies, you may find that parts of our Sites do not work properly, or you may not be able to access our Sites at all.

## **4. Third Parties**

We may pass your Personal Information on to third-party service providers contracted to us in the course of dealing with you. Any third parties that we may share your data with are obliged to keep your details securely, and to use them only to fulfil the service that they provide you on our behalf. When they no longer need your data to fulfil this service, they will dispose of the details in line with our procedures.

## **5. Disclosures**

We may share your Personal Information with the Company entities including with the Company Funds for any of the purposes set forth above. In any such business purposes set out above, the Company may share your Personal Information with third parties, including:

- Service providers e.g., attorneys, auditors, accountants, tax advisers, administrators, custodians, depositaries, distribution managers and brokerage firms, event organizers or other agent, adviser or service provider of the Company, a Company Fund and/or the Company client;
- Other counter-parties e.g., managers, general partners or investment advisers or administrators or any of their respective agents or representatives; and
- Regulatory authorities (including tax authorities), courts and bodies as required by law or requested for internal investigations and reporting.

We may transfer, sell or assign any of the information described in this policy to third parties as a result of a sale, merger, consolidation, change of control, transfer of assets or reorganization of our business.

## **6. Transfers outside the UK / European Economic Area (EEA)**

Where your Personal Information is processed by third parties outside the UK / EEA, we will ensure appropriate safeguards are in place to adequately protect it, as required by applicable law. Services on the Internet are accessible globally, so collection and transmission of Personal Information is not always limited to one country. We may transfer your Personal Information, for the purposes listed above, to the Company, service providers or other third parties which may be located in countries outside the EEA, whose laws may not give the level of protection to Personal Information as within the EEA. This may include transfers to Companies in the US (who may collect some data directly from you, in relation to the Sites which it operates) and to third parties who provide us with email and marketing services. Where we conduct any transfers, we will endeavor to take steps reasonably necessary to ensure that your data is treated securely.

## **7. Confidentiality and security of your Personal Information**

We are committed to keeping the data you provide us secure and will take reasonable precautions to protect your Personal Information from loss, misuse or alteration. Once we have received your information, we will use procedures and security features to try to prevent unauthorized access.

We have implemented information security policies, rules and technical measures to protect the Personal Information that we have under our control from:

- Unauthorized access;



- Improper use or disclosure;
- Unauthorized modification; and
- Unlawful destruction or accidental loss.

## **8. How to access, update and erase your Personal Information**

At your request, we can confirm what information we hold about you and how it is processed. If we do hold Personal Information about you, you can request the following information:

- Identity and the contact details of the person or organization that has determined how and why to process your data. The purpose of the processing as well as the legal basis for processing.
- If the processing is based on the legitimate interests of us or a third party, information about those interests.
- The categories of Personal Information collected, stored and processed.
- Recipient(s) or categories of recipients that the data is/will be disclosed to.
- If we intend to transfer the Personal Information to a third country or international organization, information about how we ensure this is done securely.
- How long the data will be stored.
- Details of your rights to correct, erase, restrict or object to such processing.
- How to lodge a complaint with the supervisory authority.
- Whether the provision of Personal Information is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether you are obliged to provide the Personal Information and the possible consequences of failing to provide such data.
- The source of Personal Information if it wasn't collected directly from you.
- Any details and information of automated decision making, such as profiling, and any meaningful information about the logic involved, as well as the significance and expected consequences of such processing.

Upon request, we will provide you with a readable copy of the Personal Information which we keep about you. We may require proof of your identity.

We will allow you to challenge the data that we hold about you and, where appropriate in accordance with applicable laws and policies, you may request to have your Personal Information:

- Erased;
- Rectified or amended; and/or
- Completed.

If you would like to make a data request, please contact us at:

<https://www.redoakcompliance.com/contact/request-more-information/>



### **Changes to this Notice**

We will occasionally update this Notice to reflect new legislation or industry practice, Company changes and customer feedback. We encourage you to review this Notice periodically to be informed of how we are protecting your Personal Information.