

Your Personal Information - Privacy Notice

Information About Us

The Cardano operating companies are:

Lincoln Pensions Limited registered in England and Wales number 06402742. Registered office: 10 Queen Street Place, London, United Kingdom, EC4R 1AG

Contact details: <http://lincolnpensions.com/contact-us/>

Cardano Risk Management Limited registered in England and Wales number 09050863. Registered office: 9th Floor, 6 Bevis Marks, London EC3A 7BA. Authorised and regulated by the Financial Conduct Authority.

Contact details: <https://www.cardano.com/en-gb/contact-us>

Cardano Risk Management B.V. incorporated and registered in the Netherlands with company number 24308915 and with its registered office at Weena 690, 21st floor 3012 CN Rotterdam, The Netherlands. Cardano Risk Management B.V. is authorised by Autoriteit Financiële Markten.

Contact details: <https://www.cardano.com/nl-NL/Contact-us>

Cardano Insights BV incorporated and registered in the Netherlands with company number 57459371 and with its registered office at Weena 690, 21st floor 3012 CN Rotterdam, The Netherlands.

Contact details: <https://www.cardano.com/nl-NL/Contact-us>

Introduction

This privacy notice describes how Cardano Risk Management Limited and Lincoln Pensions Limited ("Lincoln Pensions" / "we" / "us" / "our") collects and processes personal data about the employees, members, directors, shareholders, beneficial owners and other key contacts and personnel of the following (each, the "data subject" or "you"):

- our clients;
- the service providers that our clients appoint and we are required to interact with in order to service our clients;
- fund managers;
- other individuals with whom we maintain a business relationship; and
- shareholders of the Cardano Group.

This notice describes how we use and protect this data, and your rights in relation to this data. This privacy notice applies to all personal data we collect or process about you.

We are a "data controller". This means that we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this privacy notice.

It is important that you read this notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information.

"Personal data" has the meaning given to it in Article 4 of Regulation (EU) 2016/679 (the General Data Protection Regulation or "GDPR"). This is any information relating to an individual who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

All personal data we process will be treated in accordance with the GDPR. This means that the personal information we hold about you must be:

1. Used lawfully, fairly and in a transparent way.
2. Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
3. Relevant to the purposes we have told you about and limited only to those purposes.
4. Accurate and kept up to date.
5. Kept only as long as necessary for the purposes we have told you about.
6. Kept securely.

The Personal Data We Process

The majority of personal data processed by us is processed in order to deliver services to our clients or to undertake marketing activity to businesses. Further details about how we process personal data, and in what circumstances, is provided below.

Personal Data We Collect From You

The personal data we collect from you is normally limited to the following:

- name;
- employer's details;
- employment role;
- work email address;
- work telephone number; and
- information obtained from telephone calls (which we may record).

We may also be required to collect the following types of information to conduct due diligence as part of our "Know Your Client" process or to comply with other legal or regulatory processes:

- identification documents (such as passport copies);
- proof of address;
- information about family members where necessary (for example, if an individual has been identified as a politically-exposed person);
- information about appointments and business interests;
- details of how relevant shareholdings are controlled; and
- any other information that is required to be collected under any relevant anti-money laundering and other regulations.

Special Categories of Personal Data

We may process certain special categories of personal data (which are personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation). We process the following special categories of personal data:

- health data; and
- data revealing ethnic origin.

We may also process personal data relating to criminal convictions and offences, which are not special categories of personal data but are subject to special rules under the GDPR.

Personal data collected from other sources

We may collect personal data about you from other sources, including:

- your employer;
- a client or supplier of services to Lincoln Pensions or our clients;
- third party background checking service providers;
- public sources, such as social media, websites, news reports, and professional and other publicly available databases including through interdiction software; and
- industry bodies or marketing organisations.

The categories of personal data that we may collect from sources other than the data subject are:

- personal details (e.g. name, date of birth);
- professional contact details (e.g. work address, work phone number, work email address);
- information about your role and your professional experience;
- information about any criminal records you may have.

We may also be required to collect the following types of information to conduct due diligence as part of our "Know Your Client" or to comply with other legal or regulatory processes:

- identification documents (such as passport copies);
- proof of address;
- information about family members where necessary (for example, if an individual has been identified as a politically-exposed person);
- details of how relevant shareholdings are controlled, source of wealth and interests in assets; and
- any other information that is required to be collected under any relevant anti-money laundering and other regulations.

Other Personal Data We Collect

If you use our website, we will also collect certain personal data automatically through our use of cookies. For further information about our use of cookies, please [refer to our Google Analytics / Cookies Policy](#).

Purposes and Legal Basis for Processing

We will usually only process personal data:

- in order to provide services to our clients, including when dealing as agent; conducting research activities; and receiving and transmitting orders;
- to communicate with you;
- to verify your identity;
- to facilitate the expansion of our business relationships with individuals, clients and prospective clients;
- in the context of research or due diligence undertaken in respect of fund managers;

- in order to comply with anti-money laundering customer due diligence requirements and to conduct other due diligence that we consider prudent as a matter of sound risk management and regulatory compliance;
- to select, appoint and oversee the activities of our service providers;
- to market our services;
- to facilitate access to Lincoln Pensions online tools including maintenance of user identities, passwords and security questions; and
- to comply with our legal and regulatory obligations.

We must have a legal basis to process your personal data. This means that we will only process personal data under one of the following circumstances:

- When we have your consent. We will normally only ask for your consent where the nature of the processing is such that we are required by law to obtain your consent (for example, when we process special categories of personal data). If we ask for your consent to process your personal data, you may withdraw your consent at any time by contacting us using the details at the end of this privacy notice;
- Where necessary in relation to the performance or formation of a contract with you or to take steps at your request prior to entering into a contract. Where personal data is processed on this basis, failure to provide any personal data we request may prevent or delay the fulfilment of our contractual obligations;
- Where necessary due to a legal obligation to which Lincoln Pensions (or one of our affiliates) is subject, for example when we process personal data in compliance with our anti-money laundering obligations;
- In pursuit of our legitimate interests which are fair and lawful. This includes marketing activity to businesses without the explicit consent of data subjects, and processing which enables us to improve the services we deliver to our clients. When we process personal data in pursuit of our legitimate interests, we put in place safeguards to ensure that your privacy is protected and to ensure that our legitimate interests are not overridden by your interests or fundamental rights and freedoms.

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Data Sharing

We may share your personal data with third parties under the following circumstances:

- Service providers and business partners to Lincoln Pensions. We may share your personal data with our service providers and business partners that perform marketing services and other business operations for us. For example, we may partner with other companies to fulfil transactions, provide banking services, optimise our services, send newsletters and marketing emails, support email and messaging services and analyse information;
- Service providers and business partners to clients. We may share certain personal data, for example, when our clients give us a mandate to act as their agent to contract with third parties who provide fund management and other investment services to clients or who act as a counterparty, and in doing so we may be required to disclose personal data of Cardano shareholders or those representing the client for contracting and / or anti-money laundering due diligence purposes;
- Group companies. We share personal data among our group companies, who are listed at the top of this privacy notice. All group companies are required to comply with equivalent privacy requirements when they process your personal data;

- Any law enforcement agency, court, regulator or official registrar (such as the Financial Conduct Authority or Companies House), government authority or other third party. We may share your personal data with these parties where we believe this is necessary to comply with a legal or regulatory obligation, or otherwise to protect our rights or the rights of any third party;
- Asset purchasers. We may share your personal data with any third party that purchases, or to which we transfer, all or substantially all of our assets and business. Should such a sale or transfer occur, we will use reasonable efforts to try to ensure that the entity to which we transfer your personal information uses it in a manner that is consistent with this privacy notice.

Retention

We will retain personal data for as long as we maintain a business relationship, or for as long as it is necessary for the purposes of providing services to our clients. We will then retain personal data in line with prudent business practices, including to investigate allegations of wrong doing and impropriety, which may be up to 7 years after the end of a business relationship with the data subject (or the controller).

We will delete your personal data when it is no longer required for these purposes, except where we are required to retain the data to comply with regulatory record keeping requirements or other specific legal requirements. If there is any information that we are unable, for technical reasons, to delete entirely from our systems, we will put in place appropriate measures to prevent any further processing or use of the data.

Lincoln Pensions will maintain records of notifications and applications to regulators, and supporting documentation for as long as is deemed necessary by Lincoln Pensions, which may be indefinitely.

Protection

We will take steps to protect the personal data that we process and will maintain internal policies and procedures to restrict internal and external access to personal data that reflects the purpose for which the data is being processed and the extent to which the personal data is sensitive and could be used to cause harm to the data subject.

We will not sell anybody's personal data.

We will take steps to ensure that data processed remains accurate and up to date.

International Data Transfers

We receive and share certain information and documentation required to satisfy anti-money laundering legal requirements in respect of investment services:

- being provided to clients by Lincoln Pensions (or one of our affiliates);
- provided by suppliers to Lincoln Pensions (or one of our affiliates); and
- in line with the mandate that Lincoln Pensions (or one of our affiliates) has been given by each client when contracting as agent with third parties to provide investment and fund management services to clients.

This may require personal data and documentation of individuals representing clients to be sent to third parties inside and outside of the European Economic Area ("EEA") to enable them to comply with their legal anti-money laundering customer due diligence obligations (or their representatives, where administration has been outsourced) and in order to provide services to our clients. Information gathered by us through our use of cookies ([Google Analytics / Cookies Policy](#)) may also be transferred outside of the EEA in some circumstances.

When we transfer personal data outside of the EEA, appropriate measures based on contractual requirements will be taken to ensure the continual protection of the data. A check of the Privacy Shield Register will be undertaken prior to any transfer of personal data to the USA and model contract clause terms used where the recipient is not on the register.

Your Rights

If you receive direct marketing from us (such as research updates and event invitations), you have the right to ask us to stop sending you direct marketing. To exercise this right, please contact us using the contact details below.

You have certain rights regarding your personal data, subject to local law. These include the following rights to:

- access your personal data;
- rectify the information we hold about you;
- erase your personal data;
- restrict our use of your personal data;
- object to our use of your personal data;
- receive your personal data in a usable electronic format and transmit it to a third party (right to data portability); and
- lodge a complaint with your local data protection authority.

If you would like to discuss or exercise such rights, please contact us at the details below.

We encourage you to contact us to update or correct your information if it changes or if the personal data we hold about you is inaccurate.

We will contact you if we need additional information from you in order to honour your requests.

Contact Us

Lincoln Pensions is the controller responsible for the personal data we collect and process.

If you have questions or concerns regarding the way in which your personal data has been used, please contact your usual Lincoln Pensions contact, or alternatively you can email your request to compliance@lincolnpensions.com. The addresses of our group entities are also provided at the beginning of this privacy notice.

We are committed to working with you to obtain a fair resolution of any complaint or concern about privacy. If, however, you believe that we have not been able to assist with your complaint or concern, you have the right to make a complaint to the Information Commissioners Office (ICO). See <https://ico.org.uk/concerns/> for details.

Changes to this Privacy Notice

You may download a copy of this privacy notice at lincolnpensions.com. We reserve the right to edit this privacy notice.

If we change this privacy notice, we will notify you of the changes. Where changes to this privacy notice will have a fundamental impact on the nature of the processing or otherwise have a substantial impact on you, we will give you sufficient advance notice so that you have the opportunity to exercise your rights (e.g. to object to the processing).

April 2018