

## **Privacy Notice**

### **John Street Capital Limited**

At John Street Capital Limited we are committed to protecting and respecting your privacy.

This Policy explains when and why we collect personal information about people who visit our website, how we use it, the conditions under which we may disclose it to others and how we keep it secure.

We may change this Policy from time to time so please check this page occasionally to ensure that you're happy with any changes. By using our website, you're agreeing to be bound by this Policy. Any questions regarding this policy and our privacy practices should be addressed to either:

- [compliance@johnstreetcapital.com](mailto:compliance@johnstreetcapital.com)
- 29 Ely Place, London EC1N 6TD or
- 020 7404 9428

#### **Who are we?**

John Street Capital Limited is a London based FCA authorised and NFA registered Investment Manager, based at 29 Ely Place, London EC1N 6TD (registered address).

#### **How do we collect information from you?**

We obtain information about you when you contact us about products and services.

#### **What type of information is collected from you?**

The personal information we collect might include your name, address, email address and phone number.

#### **How is your information used?**

We may use your information to send:

- Fund information
- Fund performance data
- Marketing materials

We review our retention periods for personal information on a regular basis. We will hold your personal information on our systems for as long as is necessary for the relevant activity, or as long as is set out in any relevant contract you hold with us.

We will only use your personal data 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 data for an unrelated purpose, we will notify you in a timely manner and we will explain the legal basis which allows us to do so.

#### **Who has access to your information?**

- We will not sell or rent your information to third parties
- We will not share your information with third parties for marketing purposes

## **Your rights**

You are entitled to access any personal data about you held by us by sending a written request to the details listed above. You may be required to supply a valid means of identification as a security precaution to assist us in preventing the unauthorised disclosure of your personal information. We will process your request within the time provided by applicable law.

In certain circumstances, you are entitled to receive your personal data, which you have provided to us, in a structured, commonly-used and machine-readable format and the right to transmit that data to another data controller without hindrance, or to have that personal data transmitted to another data controller, where technically feasible.

In certain circumstances, you have the right to:

- Request the erasure of your personal data erasure (“right to be forgotten”)
- Restrict the processing of your personal data to processing in certain circumstances

Please note that the above rights are not absolute and we may be entitled to refuse requests, wholly or partly, where exceptions under the applicable law apply. We may refuse a request for erasure, for example, where the processing is necessary to comply with a legal obligation of record keeping. We may refuse to comply with a request for rectification or restriction if the request is manifestly unfounded or excessive or repetitive.

We will not contact you for marketing purposes by email, phone or text message unless you have given your prior consent.

## **How you can access and update your information**

The accuracy of your information is important to us. You have the right to ask for a copy of the information that JSC hold about you and if you change email address, or any of the other information we hold is inaccurate or out of date, please email us at: [compliance@johnstreetcapital.com](mailto:compliance@johnstreetcapital.com)

## **How long do we keep your data?**

We will retain personal information for as long as necessary to provide our services to you, to fulfil the purposes described in this Policy and/or our business purposes, or as required by law, regulation, or internal policy but will not keep your information for longer than necessary.

## **Security precautions in place to protect the loss, misuse or alteration of your information**

When you give us personal information, we take steps to ensure that it is treated securely. Once we receive your information, we make our best effort to ensure its security on our systems.

Despite these precautions, however, we cannot guarantee the security of information transmitted over the Internet or that unauthorised persons will not obtain access to personal data. In the event of a data breach, we have put in place procedures to deal with any suspected breach and will notify you and any applicable regulator of a breach where required to do so.

## **Transferring your information outside of Europe**

As part of our services, the information which you provide to us may be transferred to countries outside the European Union (“EU”). By way of example, this may happen if any of our servers are from time to time located in a country outside of the EU. These countries may not have similar data protection laws to the UK. By submitting your personal data, you’re agreeing to this transfer, storing or processing. If we transfer your

information outside of the EU in this way, we will take steps to ensure that appropriate security measures are taken with the aim of ensuring that your privacy rights continue to be protected as outlined in this Policy.

If you use our services while you are outside the EU, your information may be transferred outside the EU in order to provide you with those services.

### **Complaints**

If you have any questions, comments or complaints about this Policy, or the general use of your information, you can contact us using the details listed above. You also have the right to make a complaint to the relevant Supervisory Authority about our use of your information (in most cases under this Policy the relevant Supervisory Authority will be the Information Commissioner's Office ("ICO")). The ICO can be contacted at their website [ico.org.uk](http://ico.org.uk).

### **Review of this Policy**

We keep this Policy under regular review. This Policy was last updated in December 2019.