

## PRIVACY POLICY

We ask that you read this website privacy policy carefully as it contains important information on who we are, how and why we collect, store, use and share personal information, your rights in relation to your personal information and on how to contact us and supervisory authorities in the event you have a complaint.

This website privacy policy is divided into the following sections:

- Who we are
- Our website
- Our collection and use of your personal information
- Our legal basis for processing your personal information
- Who we share your personal information with
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### **Who we are**

This website is operated by Drakewood Capital Management Limited (hereinafter “**DCM**”). We are a commodity investment specialist with a complementary mix of commodity hedge funds and fabrication businesses.

We collect, use and are responsible for certain personal information about you. When we do so we are regulated under the General Data Protection Regulation which applies across the European Union (including in the United Kingdom) and we are responsible as ‘controller’ of that personal information for the purposes of those laws.

### **Our website**

This privacy policy relates to your use of our website, [www.drakewood.co.uk](http://www.drakewood.co.uk) only.

Throughout our website we may link to other websites owned and operated by certain trusted third parties. These other third-party websites may also gather information about you in accordance with their own separate privacy policies. For privacy information relating to these other third-party websites, please consult their privacy policies as appropriate.

### **Our collection and use of your personal information**

We collect personal information about you when you access our website, register with us, contact us, send us feedback, or purchase products or services via our website.

We collect this personal information from you either directly, such as when you register with us, contact us or purchase products or services via our website or indirectly, such as your browsing activity while on our website (see “**Cookies**” below).

The personal information we collect about you depends on the particular activities carried out through our website. Such information includes:

- your name, address and contact details
- date of birth
- bank account and payment details
- details of any feedback you give us by phone, email, post or via social media
- information about the services we provide to you
- your account details, such as username, login details

We use this personal information to:

- create and manage your account with us
- verify your identity
- provide services to you
- customise our website and its content to your particular preferences
- notify you of any changes to our website or to our services that may affect you
- improve our services

This website is not intended for use by children and we do not knowingly collect or use personal information relating to children.

### **Our legal basis for processing your personal information**

When we use your personal information, we are required to have a legal basis for doing so. There are various different legal bases upon which we may rely, depending on what personal information we process and why.

The legal bases we may rely on include:

- **consent:** where you have given us clear consent for us to process your personal information for a specific purpose;
- **contract:** where our use of your personal information is necessary for a contract we have with you, or because you have asked us to take specific steps before entering into a contract;
- **legal obligation:** where our use of your personal information is necessary for us to comply with the law (not including contractual obligations); or
- **legitimate interests:** where our use of your personal information is necessary for our legitimate interests or the legitimate interests of a third party (unless there is a good reason to protect your personal information which overrides our legitimate interests).

### **Who we share your personal information with**

With regards to the personal data, we process in connection with using the Site, we will only disclose any personal data you submit to us if this is required for the purposes of service administration to enable us to maintain and operate the Site as well as to collect traffic data.

Otherwise, and in connection with providing our services, we may share your personal data with the following categories of recipients:

- with representatives, agents, custodians, administrators, intermediaries and/or other third-party product providers appointed by a Fund or other client (such as accountants, professional advisors, custody service providers and product providers);
- third party agents and contractors for the purposes of them providing services to us, Funds and other clients (for example, our accountants, professional advisors, IT and communications providers, background screening providers, credit reference agencies and debt collectors);
- with any depository, clearing or settlement system, counterparties, dealers and others where disclosure of your personal data is reasonably intended for the purpose of effecting, managing or reporting transactions;
- where you are a joint account or portfolio holder (or otherwise one of multiple persons holding an account or portfolio), we may disclose your personal data to the other joint account or portfolio holder or other person;
- any regulatory, supervisory or governmental authorities to the extent we are required by law to do so, or in other limited circumstances (for example if required by a court order or regulatory authority, or if we believe that such action is necessary to prevent fraud);
- other third parties for those purposes that may be reasonably ascertained from the circumstances in which the information was submitted;
- other business entities should we plan to merge with or be acquired by that business entity, or if we undergo a re-organisation with that entity; and

- any successor in interest, in the event of a liquidation or administration of DCM.

### **Transfer of your information out of the EEA**

We may transfer your personal information to countries which are located outside the European Economic Area (“EEA”):

Such countries may not have the same data protection laws as the United Kingdom and EEA. Whilst the European Commission has not given a formal decision whether these countries provide an adequate level of data protection similar to those which apply in the United Kingdom and EEA, any transfer of your personal information will be subject to the General Data Protection Regulations that are designed to help safeguard your privacy rights and give you remedies in the unlikely event of a misuse of your personal information.

### **Cookies and similar technologies**

DCM set and access cookies and similar technology on your device to obtain information about how you access and use the Site. This helps us to provide you with a good experience and allows us to improve the Site. Unless you have adjusted your browser settings so that it will refuse cookies, the Site will set cookies when you load and navigate them.

Cookies are text files containing small amounts of information which are downloaded to your device when you visit a Site. Cookies are then sent back to the originating Site during your browsing session or on each subsequent visit, or to another Site that recognises that cookie. The cookies we set do lots of different jobs, like help us to improve the Site and deliver a better and more personalised service, remember your preferences and generally improve the user experience.

For further information on cookies generally visit [www.aboutcookies.org](http://www.aboutcookies.org) or [www.allaboutcookies.org](http://www.allaboutcookies.org)

### **Your rights**

Under the General Data Protection Regulation, you have a number of important rights free of charge. In summary, those include rights to:

- access to your personal information and to certain other supplementary information that this Privacy Notice is already designed to address;
- require us to correct any mistakes in your information which we hold;
- require the erasure of personal information concerning you in certain situations;
- receive the personal information concerning you which you have provided to us, in a structured, commonly used and machine-readable format and have the right to transmit those data to a third party in certain situations;
- object at any time to processing of personal information concerning you for direct marketing;
- object to decisions being taken by automated means which produce legal effects concerning you or similarly significantly affect you;
- object in certain other situations to our continued processing of your personal information; and

- otherwise restrict our processing of your personal information in certain circumstances.

For further information on each of those rights, including the circumstances in which they apply, see the Guidance from the UK Information Commissioner's Office (ICO) on an individual's rights under the General Data Protection Regulation.

If you would like to exercise any of those rights, please:

- email, call or write to us;
- let us have enough information to identify you (e.g., account number, username, registration details);
- let us have proof of your identity and address (a copy of your driving licence or passport and a recent utility or credit card bill); and
- let us know the information to which your request relates.

### **Keeping your personal information secure**

We have appropriate security measures in place to prevent personal information from being accidentally lost or used or accessed in an unauthorised way. We limit access to your personal information to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

### **How to complain**

We hope that we can resolve any query or concern you raise about our use of your information.

The General Data Protection Regulation also gives you right to lodge a complaint with a supervisory authority, in particular in the European Union (or European Economic Area) state where you work, normally live or where any alleged infringement of data protection laws occurred. The supervisory authority in the UK is the Information Commissioner who may be contacted at <https://ico.org.uk/concerns/>

### **Changes to this website privacy policy**

This website privacy policy was published on 1 October 2019 and last updated on 1 October 2019.

We may change this website privacy policy from time to time.

### **How to contact us**

Please contact us if you have any questions about this privacy notice or the information that we hold about you.

If you wish to contact us please send an email to [companysec@drakewood.co.uk](mailto:companysec@drakewood.co.uk) or write to Drakewood Capital Management Limited at 16 Great Queen St, London WC2B 5AH, United Kingdom.