

OU Endowment Management

Privacy notice - investors

May 2018

Commitment to investor privacy

Oxford University Endowment Management is committed to protecting the privacy of investors. New technologies have changed the way information is gathered and used, but our continuing commitment to preserving the security and confidentiality of personal information has remained one of our core priorities. The purpose of this Privacy Notice is to inform investors of the details of our privacy practices.

General Data Protection Regulations (GDPR) definition – ‘personal data’

Under the GDPR ‘personal data’ (referred to as personal information in this notice) means any information relating to an identified or identifiable natural person (‘data subject’); an identifiable natural person is one 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.

Collection, retention and disclosure of personal information

We collect personal information from you so we can provide investment services to you. The types and categories of information we collect and maintain about you include:

- Information we receive from you to open an account or provide investment services (such as address, telephone number, and financial information);
- Information we receive from professional advisers authorised to act on your behalf (such as your accountant and solicitor), if applicable;
- Information that we generate to service your account (such as investor notices, fact sheets, period reporting, contract notes and account statements); and
- Information that we may receive from third parties with respect to your account (such as trade confirmations and other reports from brokerage firms and custodians).

The retention period is determined by factors such as statutory requirements or industry guidelines. Your personal information in relation to the provision of investment services may be stored for a period of up to five years following the termination of the services. It may be necessary to retain your information beyond this point depending on additional legal/regulatory obligations.

We disclose your personal information to non-affiliated third parties only in limited instances and then only in connection with providing investment services to you. Some of the instances are listed below:

- Disclosures to companies that perform services on our behalf (such as our technology consultants who maintain our computer systems and our external auditors) subject to agreements that prohibit such companies from disclosing or using the information other than for the services required or as permitted by law;
- Disclosures at your direction to your professional advisers (such as your accountant, solicitor and appointed consultant, if applicable);
- Disclosures necessary to provide investment services and client services to your account (such as providing account information and trading orders to fund administrators, custodians and brokers); and
- Disclosures required by law, for example for anti-money laundering purposes.

The disclosure of personal information to third parties may involve the transfer of data to the USA and other jurisdictions outside the European Economic Area (EEA). Such countries may not have the same data protection laws. Any transmission of personal information by Oxford University Endowment Management or its delegates (being entities which Oxford University Endowment Management has

appointed or engaged to carry out functions or tasks on its behalf) outside the EEA shall be in accordance with the conditions in the GDPR.

Where we require your personal information to comply with Anti-Money Laundering (AML) or other regulatory or legal requirements, failure to provide this information means that we may not be able to accept you as a client.

Security of client information

We have policies and procedures in place that are designed to safeguard the confidentiality of your personal information. These include:

- Physical, electronic and other procedural safeguards designed to keep your personal information confidential and secure;
- Limitation of access to personal information to those employees who need it to perform their duties and are trained in the proper handling of such personal information;
- Protecting information of former investors to the same extent as current investors; and
- Requiring third parties that perform services for us to keep information confidential and secure.

Your rights

We respect your right to access and control your information. We will respond to requests for information and, where applicable, will correct, amend, or delete your personal information unless legal or regulatory restrictions (for example for anti-money laundering purposes) prevent us.

Under the GDPR your rights include:

- The right to be informed;
- The right of access;
- The right to rectification;
- The right of erasure;
- The right to restrict processing;
- The right to data portability;
- The right to object; and
- Rights related to automated decision making.

You have the right to lodge a complaint with the Information Commissioner's Office if you consider that the processing of personal information relating to you carried out by us or our service providers infringes the GDPR.

For any questions concerning this Privacy Notice, please contact Antonia Coad (Telephone: +44 1865 14970; email: coad@ouem.co.uk).