

Introduction

This privacy policy intends to clarify how we at COMAC Capital LLP (“COMAC”) and our affiliates collect and use personal data supplied to us.

This is required because of a data protection law arising pursuant to a European Union data protection directive. Businesses in European Union countries must comply with national laws enacted considering their country's interpretation of the EU data protection directive.

The legislation seeks to ensure that all personal data held by businesses and organisations is both accurate and suitably protected to ensure there is no misuse of personal data relating to an individual held by the business or organisation.

Accordingly, we endeavour to ensure that when processing your personal data, we are protecting both our and your interests by complying with the relevant legislation.

Therefore, please carefully read this privacy policy which has been included with a view to protecting your personal data as well as ensuring that we comply with the relevant legislation. By engaging with us you consent to the collection and use of your personal data in the manner set out below. If we change or modify our privacy policy we shall post these changes on this page.

Use and Processing of Personal Data

We may collect information about you and use it in the following ways:

- We may collect personal information about you from applications or forms you may complete, agreements you enter with us or during your establishing or maintaining a client relationship with us regarding an investment product or vehicle including your name, postal and email address, bank details, ongoing statements and other related information.
- We may collect information concerning the attachments you open with newsletters and other periodic distributions on various Investments products that are sent to you electronically.
- We also use the information we collect to inform you about changes to the website and, subject to any applicable local laws, other information that we think may be of interest and/or useful to you including our products and services.
- We may disclose information about our investors, prospective investors or former investors to affiliates (*i.e.*, financial and non-financial companies related by common ownership or control) or non-affiliates (*i.e.*, financial or non-financial companies not related by common ownership or control) for our everyday business purposes, such as to process your transactions, maintain your account(s) or respond to court orders and legal investigations. Thus, it may be necessary, under anti-money laundering and similar laws, to disclose information about the Partnership's and affiliated Funds' investors to accept subscriptions from them. We do not share your information with non-affiliates for them to market to you. We may disclose your information for our own marketing purposes, such as to offer our products and services to you. We may also disclose information about your transactions and experiences with us to our affiliates for their everyday business purposes.
- We may also disclose information you provide to us to companies that perform marketing services on our behalf, such as any placement agent the Partnership or affiliated Funds may retain.

You may prevent this type of sharing by calling us at +44 (0) 20 7864 6400.

Data Security and Integrity

To protect your personal information from unauthorized access and use, we use security measures. These measures include computer safeguards and secured files and buildings.

How Long We Keep your Data

Your personal data will not be kept for longer than is necessary for the purposes for which it was collected and processed and for the purposes of satisfying any legal, accounting, or reporting requirements.

Your

Rights

If you have any questions in relation to the information concerning privacy and personal data above please visit the contact page or call +44 (0) 20 7864 6400.

If your personal data changes or if you no longer wish to receive our service, please let us know and we will correct, update or remove your details. This can be done by emailing us (please refer to the contact tab on our website).

Transferring information overseas

We may share your personal information with our service providers and this may involve transferring it to countries outside the European Economic Area (EEA) whose data protection laws may not be as extensive as those which apply to us.

Whenever your personal information is transferred internationally, we will take appropriate steps to ensure its security and confidentiality in accordance with applicable data protection law.

Changes to the Privacy Policy

COMAC reserves the right to modify or amend the Privacy Policy at any time and for any reason, as permitted by applicable law. If there are material changes to the Privacy Policy, we will post those changes here.