



June 2020

Privacy Policy (FCA Ref: 806642)

We are committed to protecting and appropriately handling your personal data and take your privacy very seriously. This Privacy Policy explains what personal data we collect about you when you interact with us and our website (our “Site”), how we use it, and your rights and obligations in relation to your personal data.

Umbra Capital Partners LLP is the data controller and we are responsible for your personal data (referred to as “we”, “us” or “our” in this privacy notice). Details of our registration with the UK Information Commissioners Office can be found on the Register of Fee Payers under registration number ZA550925. You can write to us at info@umbracapital.com with any queries in relation to this Privacy Policy.

1. Types of personal data that we collect.

We collect the following types of personal data:

Contact Information including your first and last name, mailing address, email address, telephone number and other contact information you may provide when communicating with us.

Communication Information such as the contents of the communications and correspondence between us by email, or otherwise.

Technical data including your IP address and other information your device makes available to us when you visit our Site.

2. How we use your personal data.

We set out below a table where we describe each of the ways in which we use your personal data and the legal basis that applies to that use. Where the legal basis is “legitimate interest” we also set out some further details.

How we use your Personal Data	The types of Personal Data involved	Legal Basis
To deal with your requests or questions regarding our products or services	Contact Information Communication Information	Legitimate interests: It is in our mutual legitimate interest for us to respond to your enquiries.
To deal with your requests in relation to data protection rights.	Contact Information Communication Information	Compliance with a legal obligation.
To improve your experience on our Site	Technical Information	Legitimate Interests: It is our mutual legitimate interest to improve your experience on our websites



We may also process aggregated data from your personal data but this data does not reveal your identity and as such in itself is not personal data. An example of this is where we review your usage data to work out the percentage of website users using a specific feature of our site. If we link the aggregated data with your personal data so that you can be identified from it, then it is treated as personal data.

3. How/when we disclose personal data.

We may need to use or share your information with third parties in some limited circumstances. Your information may be disclosed:

- to other parts of our organization;
- to public or regulatory authorities; and/or
- to third party service providers, including cloud service providers for the hosting of our Site.

We take steps to safeguard your information and we have contractual provisions requiring all third party service providers to respect the security of your personal data and to treat it in accordance with our data protection policies and all applicable laws. We will not allow third party service providers to use your personal data for their own purposes and they will only be allowed to process your personal data in accordance with our instructions.

4. Your Rights.

You have the following rights in relation to your personal data if you are located in the EEA. We will respond to your request within 30 days of accepting it. Before accepting your request we may need to ask for some identity documentation from you, to make sure we don't inadvertently provide your personal data to someone else:

(a) Editing and updating personal data.

If you find that your personal data needs to be edited or updated, you can contact us at the details below.

(b) Accessing personal data.

You can request details of your personal data we hold. In most instances, we will comply with this request.

If you ask us, we will provide you with a copy of your personal data free of charge. We may charge you a fee to cover our administrative costs if you request multiple copies of the same information or if the requests are manifestly unfounded or excessive.

(c) Deletion of personal data.

In certain circumstances, you have the right to request that your personal data is deleted. We will review requests on a case by case basis and we might not be able to comply with your request if we need to process your personal data for certain purposes. If this is the case, we will notify you of the reasons why your request was rejected.



(d) Restriction of processing of personal data.

You have the right to request us to limit the processing of your personal data in certain limited circumstances. To the extent needed, we may still keep some of your data to ensure we comply with your request to limit processing, or for other legal purposes.

(e) Objecting to certain types of processing including automated decision making.

Where we process your personal data based upon our legitimate interests, you have the right to object to this processing on grounds relating to your particular situation if you feel it impacts on your fundamental rights and freedoms.

Where we process your personal data based upon our legitimate interests and where decisions are made by automated processing which has a legal or other significant effect on you, you may also object to such automated decision making, however, doing so may affect the delivery of our Site.

(f) Portability of personal data.

You can request us to send you any of your personal data that you have provided to us, in a structured, commonly used, machine-readable format so that it can easily be transferred and used by a third party.

(g) Withdrawing consent.

To the extent we use consent to process your data, you have the right to withdraw any consent you may have given us at any time. We will comply with your request promptly.

At any point, you have the right to object to processing of your personal data for direct marketing purposes and we will promptly comply with your request.

(h) Filing a complaint with a data protection authority.

We will try to resolve any problems that you have but you are always able to contact your local data protection authority for assistance or to make a complaint.

If you wish to exercise any of these rights, please email info@umbracapital.com.

For further information on your rights, please visit the Information Commissioner's Office website: <https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

5. International transfer of your personal data.

We might need to transfer your personal data to other countries. If you are in the European Economic Area (EEA), please be aware that we may need to transfer your data to countries outside the EEA to process it.

Whenever we transfer your personal data out of the EEA, we do our best to ensure a similar degree of security of data by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission; or
- Where we use certain service providers, we may use specific contracts or codes of conduct or



certification mechanisms approved by the European Commission which give personal data the same protection it has in Europe; or

– Where we use providers based in the United States, we may transfer data to them if they are part of the EU-US Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US.

If none of the above safeguards is available, we may request your explicit consent to the specific transfer. You will have the right to withdraw this consent at any time.

6. Security.

We have put in place appropriate security measures to protect your personal data from being accidentally lost, misused or accessed in an unauthorised way, altered or disclosed. These include technical, administrative and physical security measures to ensure that any data we collect is stored and processed securely.

We have procedures to deal with any suspected personal data breach and we will promptly notify you and any applicable regulator of a breach in accordance with our legal obligations.

Cookie	Name	Purpose
Google Analytics	_ga _gid _gat	These cookies are used to collect information about how visitors use our website. We use the information to compile reports and to help us improve the website.

To find out more about cookies, including how to see what cookies have been set, visit www.aboutcookies.org or www.allaboutcookies.org. Most Web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. If you choose to decline cookies, you may not be able to fully experience certain features of the Site.

8. How long we keep your personal data.

We keep your personal data as long as it is needed to achieve our purposes listed above, as well as for the amount of time necessary to meet any legal, tax, or reporting requirements.

We do not keep your personal data for longer than necessary and up to 5 years after your last interaction with us (e.g. using one of our Site). We may keep your data for longer than 10 years



for legal or technical reasons. We may also keep it for statistical purposes. However, if we do, we will ensure that your privacy continues to be protected and only use it for these purposes.

9. Special Rules for Children.

We do not collect personal data from children under the age of 13. If we discover that we have accidentally collected personal data from a child below the age of 13, we will delete it from our records as soon as reasonably possible.

10. Third party sites and information.

The Site contain links to sites that are run by third parties such as other organizations, sponsors, content providers and advertisers. Once you've clicked on a link or button activator for an outside website, you will leave the site and be taken to sites that we do not control, and our privacy policy no longer applies on those sites.

You must read the privacy policy of the third party website concerning how personal data will be used. We are not responsible for the privacy practices or the content of such content providers or third party sites.

11. Contact us.

If you have any questions or opinions regarding this Privacy Policy, or if you have a request regarding information you provided us, you may either email us at info@umbracapital.com or write to us at the address below:

The Wellsprings
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