



# Privacy Notice

## Introduction

Protecting your personal information is important to us. We have, therefore, created this notice in accordance with the EU data protection regime introduced by the General Data Protection Regulation (Regulation 2016/679 the "GDPR"). GDPR strengthens and unifies data protection across the European Union. It also applies to all organisations that hold or process the personal information of EU-based individuals.

The legislation is intended to ensure that all personal information held by organisations (including, for example, a work email address) which might allow you, as an individual, to be identified, is accurate and secure and there is no mis-use of personal information by that organisation.

This document sets out how StoneFarm Capital ("StoneFarm") collects, uses and safeguards the personal information that you, as an individual, provide to us.

This notice covers all communication with StoneFarm, including users of StoneFarm's website. In this privacy notice:

"you" or "your" refers to you as an individual and not to any legal entity (such as your employer) which you may be representing by viewing our websites or communicating with us.

"our", "ours", "we" or "us" refers to StoneFarm Capital Limited, a private limited company incorporated under the laws of Malta (Malta Business Register C97557) and authorized by the Malta Financial Services Authority under the Investment Services Act (Chapter 370 of the Laws of Malta), having its registered office address at Airways House, Floor 6, Gaiety Lane, Sliema SLM 1549, Malta, or any of its affiliates or group companies.

Please note, if you provide personal information relating to other individuals (for example contact details in a work context), you must either advise those individuals of the details of this notice or provide them with a link to this notice.

By providing your information to StoneFarm you consent to the collection and use of your personal information in the manner set out below.

The privacy notice covers only StoneFarm, it does not cover the privacy policies of other entities.

Should you have any questions on this notice, please email them to: [info@stonefarmcapital.com](mailto:info@stonefarmcapital.com)

## Collection of personal data

When you visit the StoneFarm website or contact a StoneFarm entity, and when providing any services to you, StoneFarm may collect personally identifiable information about you from information provided by you.

This can include the following information relating to you: name, address (residential or corporate), geographical location, email address, contact details, corporate contact information, correspondence records.

We may also obtain personal information on you from other public sources.

## Purposes of processing and legal basis for processing

Generally, StoneFarm will use the personal information provided by you to:

- Offer a contact facility through StoneFarm's website
- Email updates relating to financial services and financial products we offer
- Respond to queries or provide services to you
- Maintain or update contact data about you or a third party (for example your employer)

within StoneFarm's systems

- ◆ Enable us to act on any agreement with you, your employer or any other relevant third party
  - ◆ Provide to any third parties that may host, maintain or manage services for StoneFarm, solely to the extent necessary to fulfil their hosting, maintenance or service management functions
- We will never share your personal information with others for marketing purposes, unless you have given us your explicit permission to do so. Where you have done so, we will only share your information with:
- ◆ Those service providers that help us manage our marketing activities; or
  - ◆ With the co-sponsors of our events, for the purposes of facilitating those events.

Accordingly, you understand that we may use your personal information for the purposes as described above, provided that we are acting in a fair, transparent and accountable manner and that we have taken appropriate steps to prevent the activity having any unwarranted impact on you and also noting your right to object to such use, as discussed below.

We have a legitimate interest in carrying out the processing, which is not overridden by your interests, fundamental rights or freedoms. Our legitimate interest will be one or more of the following:

- ◆ We have legal and regulatory obligations that we have to discharge
- ◆ Our legitimate interest in the management and operation of our business
- ◆ Our legitimate interest in the provision of goods and services to our customers
- ◆ Our legitimate interest in the promotion of our business and making sure our marketing is relevant to you
- ◆ Maintaining compliance with internal policies and procedures; or
- ◆ Being able to contact you

Should we wish to use your personal information for other purposes (including, if applicable, any purpose that requires your additional consent), we will contact you.

Your data is stored using cloud based applications and widely-used software applications.

### Recipients of data and transfer of data

StoneFarm may disclose personal information to:

- ◆ Entities within the StoneFarm group, its service providers and their respective affiliates engaged by StoneFarm to process data for the above-mentioned purposes;
- ◆ To regulatory authorities, courts and bodies as required by law or to service providers for internal investigations and reporting.
- ◆ Third parties for compliance with applicable laws, or as required by law of relevant government or administrative authority and then, to the extent reasonably possible, only subject to customary undertakings of confidentiality;
- ◆ Third parties in connection with legal proceedings or otherwise to assert and protect our legal interests.

The disclosure of personal information to the third parties set out above may involve the transfer of data other jurisdictions outside the European Economic Area ("EEA") which may include the United States. Any transmission of personal information by StoneFarm or its service providers outside the EEA shall be in accordance with the conditions of the GDPR. These countries may not have the same data protection laws that apply in the EEA, but StoneFarm will authorise its group entities or other service providers to transfer personal information to other countries only where standard contractual clauses or other safeguards permitted under the GDPR have been put in place with parties to whom personal information will be transferred.

StoneFarm and its service providers apply appropriate information security measures designed to protect personal information in its or its service providers' possession from unau-

thorised access by third parties or from any form of computer corruption. We cannot guarantee the complete security of our database, nor can we guarantee that information you supply will not be intercepted while being transmitted to us over the internet. We have however implemented guidelines to ensure that your privacy is safeguarded and will continue to update policies and implement additional security features as new technologies become available.

### Third party sites

Our communications may contain links to third party websites. As we do not control the information on these websites, you should review their privacy policies and cookies to learn about how that website may collect and use your personal information.

When accessing any third party sites that may be linked you will leave this website. These third party sites are not controlled or endorsed by StoneFarm. StoneFarm is not responsible for the contents, operation or security of such sites.

### Retention period

StoneFarm will retain personal information only for as long as required for the purposes set out above. Once the personal information is no longer required, we will take appropriate steps to dispose of any records containing your personal information, to the extent this is operationally feasible and proportionate.

### Data subject rights

Where StoneFarm holds personal information, the owner of that information has the following rights, in certain circumstances, in relation to their personal information:

- ◆ Right to access any personal data held
- ◆ Right to have any inaccurate personal data rectified
- ◆ Right to restrict the use of personal data
- ◆ Right to request that personal data is erased
- ◆ Right to object to the processing of personal data
- ◆ Right to obtain a copy of any personal data held in electronic form (data portability)
- ◆ Right to lodge a complaint with the data protection regulator (details of which are provided below) if you think that any of your rights have been infringed by us.

StoneFarm will notify you of any personal data breach affecting you that is likely to result in a high risk to your rights and freedoms.

You can find out more information about your rights by contacting the data protection regulator in your jurisdiction, the Information and Data Protection Commissioner - <https://idpc.org.mt/>. If your personal information has changed or requires correcting, please let us know by emailing [info@stonefarmcapital.com](mailto:info@stonefarmcapital.com) so that we can update our records.

If you don't wish us to hold any data on you or would prefer that we do not contact you for any reason, please contact us at [info@stonefarmcapital.com](mailto:info@stonefarmcapital.com).

### Opting out of receiving communications

StoneFarm and its service providers from time to time send communications, such as fund performance information, manager factsheet, general StoneFarm updates and event information. All such communications from us include an email address which can be contacted should you no longer wish to receive these types of communication from us.

Alternatively, you can send an email to [info@stonefarmcapital.com](mailto:info@stonefarmcapital.com) requesting to be removed from some or all of our mailing lists.

### Personal data requests

Any questions about our use of your personal information should be directed to StoneFarm at [info@stonefarmcapital.com](mailto:info@stonefarmcapital.com)

### Data protection officer

StoneFarm has no regulatory obligations under the GDPR to appoint a DPO; StoneFarm has no data protection officer (DPO) currently appointed.

The GDPR sets out guidelines on when the appointment of a DPO shall be required as follows:

- ◆ Where the scope or purpose of collecting data requires a regular systematic monitoring of the data subjects;
- ◆ Where the firm processes special categories of data on a large scale;
- ◆ Where processing is carried out by a public authority.

StoneFarm has instead agreed to name a Responsible Officer who may be reached at [info@stonefarmcapital.com](mailto:info@stonefarmcapital.com)

### Changes to the privacy policy and notice

StoneFarm 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 as part of an updated privacy notice on our webpage.

We will not notify you separately of any changes or updates to this privacy notice, but instead will post them to [www.stonefarmcapital.com](http://www.stonefarmcapital.com). Any change or update will be effective immediately upon posting.

Version as of 26 April 2022