

Privacy Policy

1. Background

Your privacy is very important to us. This Privacy Policy sets forth our policies with respect to non-public personal information of current, prospective and former investors and clients (collectively, "Investors"). These policies apply to investors in our Funds, other managed account clients and internet users of the Sturgeon Capital Ltd website (the "Site") and may be changed at any time. Changes will be effective immediately upon posting onto our Site for internet users or provided to you if visiting our offices.

2. Your Information

Your information is the information which we obtain about you. This information includes your name, your title, address, telephone number, email address, the company you work at, your job title, years of industry experience, country of your domicile and any other contact details. It includes information which you give to Sturgeon Capital Ltd ("Sturgeon Capital") or which we obtain about you, through your use of this Site and/or in connection with any products Sturgeon Capital provide to you and in correspondence, including emails and conversations with Sturgeon Capital.

We also gather information about you from our Site. This will include information (such as how many people visit our Site, the pages they visit, the features they use, how long they stay and the websites they are connecting from) collected on an aggregate basis on public areas of our Site, or on an individual basis on areas of our Site that require Site visitors to logon using an access code (e.g. user ID and/or password). We may also collect information through the use of Cookies. Please see our Cookies Policy for details as to what cookies are and which cookies we use.

Prior to using cookies we will ask for your consent.

3. How We Use Your Information

We will use your information to improve the calibre of online information and services offered. Sturgeon Capital does not disclose your non-public personal information to anyone other than to our affiliates, and as permitted by law or as necessary in connection with the provision of Sturgeon Capital's services to you, such as to Sturgeon Capital's accountants, attorney's, auditors, brokers and regulators and service providers (such as and not limited to, UK Regulators, Irish Stock Exchange, CSSF, CIMA, Rees Pollock, Denton's, Alter Domus, RBC, Circle Partners, Custom House, Module, CHW, Intertrust, PwC, Visor, Renaissance, BCS, BGS, Halyk, and only as necessary to facilitate the acceptance and management of Sturgeon Capital's relationship with you. Thus, it may be necessary under anti-money laundering regulations and similar laws, to disclose information about you. These agencies may retain a record of the search and share your information with other organisations. We will only share your information on condition that these entities keep your information strictly confidential.

We may share your information with any governmental or regulatory body, if required to do so by law. Otherwise, we will not use your information for any other purposes.

Sturgeon Capital Ltd
1a Britannia Street, London, United Kingdom, WC1X 9JT

Sturgeon Capital Ltd is authorised and regulated by the Financial Conduct Authority

In sharing your personal information with our service providers 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. Where we do so, we will ensure that we do this in accordance with the Acts and take appropriate measures to ensure that the level of protection which applies to your personal information processed in these countries is similar to that which applies within the EEA. Such measures may include only transferring your data to jurisdictions in respect of which there is a European

Commission adequacy decision or, where this is not the case, by using model clauses which have been approved by the European Commission.

Your data will not be used to make automated decisions. We will not lend or sell your information to third parties.

4. For how long is your personal information retained by us?

We are committed to only keeping your personal data for as long as we need to in order to fulfil the relevant purpose(s) it was collected for, as set out above in this notice, and for as long as we are required or permitted to keep it by law.

We retain copies of our customer contracts in order to enable us to deal with any legal issues and the information provided to us for identification verification checks, financial crime and anti-money laundering checks (as required by law) for 5 years after termination or expiry of our contract with you. We retain details of complaints for 5 years from the date of receipt.

We shall keep records of the following for 5 years:

- Call recordings, electronic communications and minutes of face-to-face meetings;
- Suitability and appropriateness assessments
- Periodic statements (e.g. valuations); and
- All orders and transactions in financial instruments on your behalf (including information about your identity).

Sturgeon Capital retains copies of all records aforementioned for a maximum of 7 years.

5. Security

We are committed to ensuring that your information is secure. We have implemented measures and procedures to prevent unauthorized access or disclosure. Likewise, we seek to keep confidential all information you send to us.

6. What are your rights?

Data protection laws may provide you with rights to object to marketing. They may also provide you with rights including rights to access data, as well as rights for data to be erased, corrected, used for only limited purposes, not used at all, or transferred to you or a third party. You can seek to exercise any of these rights by contacting us at the details set out in the "Contact Us" section below.

You may have the following rights under data protection laws:

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- **Right of subject access:** The right to make a written request for details of information about you held by Sturgeon Capital and a copy of that information.
 - **Right to rectification:** The right to have inaccurate information about you rectified.
 - **Right to erasure ('right to be forgotten'):** The right to have certain information about you erased.
 - **Right to restriction of processing:** The right to request that your information is only used for restricted purposes.
 - **Right to object:** The right to object to the use of your information, including the right to object to marketing.
 - **Right to data portability:** The right, in certain circumstances, to ask for information you have made available to us to be transferred to you or a third party in machine-readable formats.
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- **Right to withdraw consent:** The right to withdraw any consent you have previously given us to handle your information. If you withdraw your consent, this will not affect the lawfulness

of Sturgeon's use of your information prior to the withdrawal of your consent. To withdraw your consent, please send your request notifying us of your wish to withdraw consent by writing an email to sc@sturgeoncapital.com

- **Right to complain:** If you wish to make complaint about how your personal data is being processed by Sturgeon Capital Ltd, or how your complaint has been handled, in the first instance please email your concerns to sc@sturgeoncapital.com. You also have the right to send a complaint directly to the national data protection authority, which is the Information Commissioner's Office (ICO) in the UK and can be contacted via the details at www.ico.org.uk.

7. Contact Us

Sturgeon Capital Ltd (company number 07421440), whose registered office is at 1a Britannia Street, WC1X 9JT London, United Kingdom, is the Data Controller and is committed to protecting the rights of persons in line with GDPR.

If you have any questions about this privacy policy, or if you wish to exercise your rights, you can write to the address stated above marking your letter "For the attention of the Compliance Department" or address your email to sc@sturgeoncapital.com with the subject matter addressed to "the Compliance Department".

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