



PRIVACY POLICY

IMPORTANT: PLEASE READ THIS PRIVACY POLICY AS IT APPLIES TO ANY PERSONAL DATA YOU PROVIDE US OR WE COLLECT ABOUT YOU, FOR EXAMPLE IF YOU ACCESS THE WEBSITE AT WWW.NORTHLANDER-ADVISORS.COM OR ANY OTHER WEBSITE OWNED, OPERATED OR PROVIDED BY NORTHLANDER COMMODITY ADVISORS LLP, INCORPORATED IN ENGLAND, COMPANY OC371111, REGISTERED OFFICE 130 JERMYN STREET, 6TH FLOOR, LONDON, ENGLAND, SW1Y 4UR ('WEBSITE' AND 'US', 'WE' RESPECTIVELY) OR ENQUIRE ABOUT ANY OF OUR PRODUCTS ('PRODUCTS') OR SERVICES ('SERVICES'). WE DO NOT MARKET TO OR ENTER INTO CONTRACTS WITH CHILDREN NOR DO WE COLLECT PERSONAL DATA FROM ANY PERSON UNDER 18 YEARS OF AGE. PLEASE DO NOT ACCESS OR USE THE WEBSITE OR SERVICES IF YOU ARE UNDER 18 YEARS OF AGE.

This policy

This policy sets out what personal data we might collect, how we process and protect that data, the lawful grounds for that processing, and your related rights. Essentially 'personal data' means any information relating to an identified or identifiable natural person, namely one who can be identified, directly or indirectly from that information alone or in conjunction with other information.

In most cases, the lawful ground will be that the processing: (i) is necessary for our legitimate interests in carrying out our business, provided those interests are not outweighed by your rights and interests ('Legitimate Interests'), (ii) is necessary to perform a contract with you ('Contract'), or (iii) is necessary to comply with our legal obligations ('Legal Obligation'). Where processing is based on your consent ('Consent'), we will identify the processing purposes and provide you with relevant information to make the processing fair and transparent.

As data protection law and practice are constantly developing, we'll need to update this policy from time to time, which we'll do by posting a new policy on the Website that takes effect from the date stated. It is your responsibility to return to the Website from time to time and check for changes.

How do we obtain personal data?

We collect or are provided personal data in the normal course of business, for example:

- you may provide us with your details during discussions about our Products,
- you may provide us with your details when you ask about our Services (by email or otherwise) and we may obtain legally-compliant lists of potential customers for our Products and Services for our marketing purposes.

If we update our policy to use cookies we may collect information when you visit the Website about your visit, such as your IP address and the pages you visited.

When you provide us with personal data about yourself or another person, you are confirming to us that you are authorised to provide us with that information and that any personal data you give us is accurate and up-to-date.

Sensitive personal data

Given the nature of our business, we do not ask for 'sensitive' or 'special categories of personal data', such as information about your health, political opinions, racial origins or sexual life and we would ask you not to send any to us.

How do we use personal data?

We use personal data in the normal course of our business, for example:

- to respond to enquiries about our Products and Services, to provide the Websites and Services, to provide advice and support. Lawful basis: Legitimate Interests or Contract.
- to analyse and improve the Website, the Services, for example for technical or security purposes and to improve the customer experience. Lawful basis: Legitimate Interests, however where for example applicable law requires your consent to use certain cookies, we will ask for your Consent having provided you with relevant information.
- to market our Products and Services – if we do so, we will provide you with an easy and free way to opt-out of receiving such communications in the future. Lawful basis: Legitimate Interests (or Consent as above).
- in certain circumstances, to share it with a limited number of third parties as described in this policy, for example for operational requirements and business continuity purposes. Lawful basis: most processing will be based on Legitimate Interests, some processing is based on Contract and, where necessary (as above) some processing may be based on your prior Consent.

Sharing Data & International Transfers

We will not give, sell or rent your personal data to third parties so they can market their products or services to you. Nor do we accept advertising from third parties on the Website. We may share personal data in the following limited circumstances.

- For provision of the Services, and for our own disaster recovery and business continuity purposes, we may store or transmit personal data to or through third party providers, such as with our contractors and advisors to help us operate, secure and analyse our business. Lawful basis: Legitimate Interests or Contract.
- We may be obliged to disclose your personal data to comply with a law, order or request of a court, government authority, other competent legal or regulatory authority or any applicable code of practice or guideline. Lawful basis: Legal Obligation.
- If we enter negotiations with a third party for the sale or purchase of all or part of our business, we will only disclose personal data to that third party to the extent it relates to that business and only under conditions of confidentiality requiring the third party to be bound by the privacy policy that applies to that data. Lawful basis: Legitimate Interests.

In each case, we share the minimum personal data necessary and we have written contracts in place incorporating relevant wording to safeguard that personal data and comply with applicable laws, and we will only share such data as is necessary for the purpose in question. Where possible, we keep personal data within the European Economic Area ('EEA'). However, in order to carry out the above purposes, we may use third parties and their facilities outside the EEA. In all such cases we will ensure that appropriate security measures are in place to protect your personal data and a valid legal basis for the transfer applies.

Cookies

Our Website does not use cookies and/or similar technologies We will update the policy if we do.

Retention

As a default position, we will only retain personal data for any statutory retention period, then a reasonable period (if any) necessary for the above purposes. This is subject, for example, to any valid opt-out or withdrawal of consent where processing is based on consent, or other valid exercise of your data subject rights which is effected.

Security

The security of data is very important to our business. In accordance with our legal obligations, we take appropriate technical and organisational measures to protect your personal data and keep those measures under review. However, we can only be responsible for systems that we control and we would note that the internet itself is not inherently a secure environment.

Anonymised data

We may create anonymised data from personal data, and any anonymisation would be carried out in accordance with applicable law as well as relevant guidelines from regulators such as the UK Information Commissioner. Anonymisation may, for example, be achieved by aggregating data to the point that no individual can be identified such as aggregating website use statistics to see which web content is working well and which could be improved. Anonymised data does not allow for the identification of any individual person and, as it is no longer personal data, neither data protection laws nor this Privacy Policy would apply to such data.

Third Party Services

If you access the services of another provider through our Website or Services, for example through a link on the Website, your use of those services is entirely at your risk and governed by the terms and privacy policy of that third party provider. If we resell a service delivered or provided by a third party ('Third Party Service'), including any software that is delivered or owned by a third party ('Third Party Software'), it is that third party's separate privacy policy that will apply to your personal data and your use of the Third Party Service and Third Party Software. Your use of a Third Party Service is not covered by this Privacy Policy. Please therefore review the privacy policy for any Third Party Service and Third Party Software before using it.

Your rights

You have the right to know if we process any personal data about you and, if we do, with certain limitations, to a copy of that personal data. You also have the right to ask us to remove or correct any of that personal data that is inaccurate, to object to certain processing and to withdraw any consent you may have given us for any processing of your personal data. You also have the right to ask us to restrict processing certain of your personal data, to erase your personal data, and to 'port' certain of your personal data to you or another provider, provided in each case that we have such data and certain conditions are met.

You have the right, at any time, to object to the processing of your personal data for direct marketing.

'Do Not Track'

The Website does not use technologies that respond to 'Do-Not-Track' signals communicated by your internet browser.

Contact Us

If you've any question you can always contact us at the address above or privacy@northlander-advisors.com. You have the right, at all times, to notify a complaint to any regulator such as the UK Information Commissioner, although we would welcome the opportunity to discuss and resolve any complaint with you first.