



Northlander Commodity Advisors LLP

Privacy Notice

2022

THIS DOCUMENT SETS OUT THE CORPORATE POLICIES OF NORTHLANDER COMMODITY ADVISORS LLP (“NORTHLANDER” OR THE “FIRM”) AND APPLIES TO ALL PARTNERS, EMPLOYEES AND CONTRACTORS (“EMPLOYEES”).

THIS DOCUMENT IS THE PROPERTY OF NORTHLANDER COMMODITY ADVISORS LLP AND MUST BE RETURNED BY AN EMPLOYEE UPON THE EMPLOYEE’S TERMINATION OF EMPLOYMENT. THE CONTENTS OF THIS MANUAL ARE CONFIDENTIAL, AND MUST NOT BE REVEALED TO THIRD PARTIES

Privacy Notice

Northlander Commodity Advisors LLP (“Northlander” or the “Firm”) is a company registered in England and Wales with company number OC371111. Northlander is authorised and regulated by the Financial Conduct Authority (“FCA”) with Firm Reference Number 587706.

Northlander is required by Regulation to adopt certain procedures designed to maintain and secure the “Non-Public Personal Information” of its clients from inappropriate disclosure to third parties.

The following “Privacy Notice” is designed to meet the standards set forth in the aforementioned regulations.

Northlander is committed to keeping Non-Public Personal Information collected from potential, current, and former clients confidential and secure. The proper handling of Non-Public Personal Information is one of our highest priorities. The Firm never sells information relating to its clients to any outside third parties.

For the purposes of the General Data Protection Regulation (‘GDPR’), Northlander will be the ‘controller’ of the personal data you provide. Please read the following information carefully in order to understand the Firm’s practices in relation to the treatment of your personal data. Should you have any questions, please email us at Compliance@northlander-advisors.com .

What data privacy principles does the Firm adhere to?

- The Firm will process all personal data in a lawfully, fair and transparent manner;
- The Firm will only collect personal data where it is necessary;
 - For the Firm to provide a service to you;
 - For you to provide a service to the Firm;
 - For the Firm to keep you informed of its products and services; or
 - For the Firm to comply with its legal and regulatory obligations.
- The personal data collected by the Firm will be adequate, relevant and limited to what is necessary in relation to the specific purpose for which your data will be processed;
- The Firm will take all reasonable steps to ensure that personal data is accurate and, where necessary, kept up-to-date;
- The Firm will maintain personal data in a form that permits identification no longer than is necessary for the purposes for which the personal data has been collected for processing, in accordance with the Firm’s record retention requirements as mandated by the Financial Conduct Authority;
- The Firm will hold and process person data in a manner that ensures appropriate security;
- The Firm will only share personal data where it is necessary to provide the agreed service or where it is necessary for the Firm to comply with its legal and regulatory requirements.
- The Firm will only utilise a service provider based outside of the EEA for the processing of personal data where this is strictly necessary to facilitate our services to you. In all cases, we will ensure service providers are fully compliant with GDPR ahead of transferring any personal data.

Client Information

Northlander only collects and keeps information which is necessary for it to provide the services requested by its clients, and to administer clients' business with the Firm. The Firm may collect Non-Public Personal Information from clients or potential clients when they complete a subscription document or other form. This may include information such as name, address, social security number, assets, income, net worth, copies of financial documents, and other information deemed necessary to evaluate the client's financial needs.

This information may be obtained as a result of transactions with the Firm, its affiliates, its clients, or others. This could include transactions completed with the Firm or information received from outside vendors to complete transactions or to effect financial goals.

What personal data does the Firm collect and why?

In the course of providing products/services to you, the Firm may collect information that is considered personal information (e.g. name, contact details, address, passport number, driving licence).

As a client, contact or employee of Northlander, we will require some personal information in order to verify your identity and have the applicable relationship with you. Some of this information may be required to satisfy legal obligations (e.g. to comply with obligations arising under the money laundering regulations whereas other information may be required in connection with the provision of services to you). The information collected will vary depending on the service the Firm provides to you or you provide to the Firm, but typically includes:

- Personal information: Such as your name, date of birth, passport number or national insurance number;
- Contact information: Including your address, telephone number and email address.

Sharing Information

The Firm only shares the Non-Public Personal Information of its clients with non-affiliated companies or individuals (i) as permitted by law and as required to provide services to clients, such as with representatives within our firm and securities clearing firms or (ii) to comply with legal or regulatory requirements. The Firm may also disclose Non-Public Personal Information to another financial services provider in connection with the transfer of an account to such financial services provider. Further, in the normal course of our business, the Firm may disclose information it collects about clients to companies or individuals that contract with the Firm to perform servicing functions such as:

- Recordkeeping
- Computer-related services

Companies hired to provide support services are not permitted to use Non-Public Personal Information for their own purposes and are contractually obligated to maintain strict confidentiality and abide by applicable law. The Firm limits use of Non-Public Personal Information to the performance of the specific service requested. The Firm does not provide its clients' Non-Public Personal Information to mailing list vendors or solicitors for any purpose.

Where does the Firm store my personal data?

The Firm has comprehensive policies and procedures in place to ensure your personal data is kept safe and secure, with these including:

- Data encryption;
- Firewalls;
- Intrusion detection;
- Background checks for personnel that access physical facilities; and
- Security procedures across all service operations.

How long does the Firm retain personal data?

As a regulated entity, the Firm is required to maintain its books and records for a prescribed period (five years from either the ceasing of a business relationship, or, in the case of non-clients, from the making of a record – or alternatively, for seven years, where specifically requested to do so by the Financial Conduct Authority). As such, information that falls in scope of either of these requirements is retained in line with the mandated timeframe.

Any information that is outside the scope of this requirement will be retained whilst relevant and useful, and destroyed where this ceases to be the case or where the data subject specifically requests this.

Employee Access to Information

Only employees with a valid business reason have the ability to access a client's Non-Public Personal Information. These employees are educated on the importance of maintaining the confidentiality and security of this information. They are required to abide by our information handling practices.

Protection of Information

The Firm maintains security standards to protect clients' Non-Public Personal Information, whether written, spoken, physical, or electronic. The Firm updates and checks its physical mechanisms and electronic systems to ensure the protection and integrity of information.

Maintaining Accurate Information

The Firm's goal is to maintain accurate, up to date client records in accordance with industry standards. The Firm has procedures in place to keep information current and complete, including timely correction of inaccurate information.

E-Mail

Should clients send the Firm questions and comments via e-mail, the Firm will share the client's correspondence only with those employees or agents most capable of addressing the client's questions and concerns.

The Firm will retain all written communication until it has done its very best to provide the client with a complete and satisfactory response. Ultimately, the Firm will either discard the communication or archive it according to the requirements under applicable law.

Please note that, unless expressly advised otherwise, the Firm's e-mail facilities do not provide a means for completely secure and private communications. While every attempt will be made to keep client Non-Public Personal Information confidential, from a technical standpoint, there is still a risk of unauthorized disclosure. For that reason, please do not use e-mail to communicate information to the Firm that is considered to be confidential. If the client wishes, communications with the Firm may be conducted via telephone.

How have I been categorised in accordance with GDPR?

The GDPR requires the Firm to inform you of the legal basis on which we maintain your personal data. Typically, the Firm will reach out to you personally to confirm this; however, as a general rule the following is applicable:

- Clients – Information is maintained on the basis of contractual obligation and/or legitimate interests (where relevant);
- Service providers – Information is maintained on the basis of contractual obligation; and
- Database/marketing contacts – Information is maintained on the basis of legitimate interest.

What are my rights?

Once you have provided your details to Northlander, you have certain rights which apply, depending on your relationship with the Northlander, the information you have shared with us and Northlander's legal and regulatory obligations.

- You have the right to request a copy of the information that we hold about you. If you would like a copy of some, or all, of your personal information, please email Northlander at Compliance@northlander-advisors.com. The Firm will provide this information to you within one month (with the ability to extend this by an additional two months where necessary), free of charge.
- You have the right to request that the information the Firm holds about you is erased under certain circumstances including where there is no additional legal and/or regulatory requirement for the Firm to retain this information.
- As a client, you have the right to request that any information the Firm holds about you be provided to another company in a commonly used and machine-readable format, otherwise known as 'data portability'.
- You have the right to ensure that your personal information is accurate and up to date, or where necessary rectified. Where you feel that your personal data is incorrect or inaccurate and should therefore be updated, please contact Compliance@northlander-advisors.com.
- You have the right to object to your information being processed, for example for direct marketing purposes.
- You have the right to restrict the processing of your information, for example limiting the material that you receive or where your information is transferred.
- You have the right to object to any decisions based on the automated processing of your personal data, including profiling.

- You have the right to lodge a complaint with the Information Commissioner’s Office (<https://ico.org.uk/concerns/> if you are not happy with the way that we manage or process personal data.

Will I be notified of changes to this policy?

The Firm may, from time to time, review and update this policy. The Firm will maintain the latest version of this policy on its website, and where the changes are deemed material, it will make you aware of these.

Disclosure of our Privacy Policy

The Firm recognises and respects the privacy concerns of its potential, current, and former clients. The Firm is committed to safeguarding this information. As a member of the financial services industry, the Firm is providing this Privacy Notice for informational purposes to US clients/investors. The Firm will distribute and update it as required by law. It is also available upon request.

Who should I direct questions to?

If you have any questions, concerns or complaints about the practices contained within this document or how the Firm has handled your data, please email: Compliance@northlander-advisors.com. Alternatively, you may write to: Office 24.02, 24/25 The Shard, 32 London Bridge, London, SE1 9SG.