

# Narrow Water Partners

## Privacy Policy

Narrow Water Partners Ltd. is a limited company registered under the laws of England and Wales under number 13848062, with registered office address: Registered office: 13 The Causeway, Teddington, London, TW11 0JR.

“We”, “us”, means Narrow Water Partners Ltd. (the “Investment Manager”) and we are committed to respecting your privacy.

For the purposes of data protection law, we are a data controller in respect of your personal data. Narrow Water Partners Ltd. is responsible for ensuring that it uses your personal data in compliance with data protection law.

This privacy notice applies to you if you are providing or have provided Narrow Water Partners Ltd. with any personal data in support of an investment (or prospective investment) managed by us. The privacy notice sets out the basis on which any personal data about you that you provide to us, that we create, or that we obtain about you from other sources, will be processed by us.

### 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 UK 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 , or deemed equivalent , ahead of transferring any personal data.

### The Type of Information we collect

In the course of providing products/services to you, we may collect information that is considered personal information such as: name, contact details, address, passport number, driving licence, financial information, tax residency, and tax identification numbers, amongst other data.

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As a client, contact or employee of Narrow Water Partners Ltd, 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.

## How we get the personal information and why we have it

Most of the personal information we process is provided to us directly by you for one of the following reasons:

- For the purposes of establishing a business relationship
- For the effective implementation of any business relationship
- To verify your identity and to satisfy our legal obligations in respect of KYC (Know Your Customer) procedures, and money laundering safeguards

We may share this information with other organisations that provide us with services relating to the operation of our business such as administrators and custodians.

Under the UK General Data Protection Regulation (UK GDPR), the lawful bases we rely on for processing this information are:

- We have a legal obligation
- We have a legitimate interest

## How we store your personal information

Narrow Water Partners Ltd. has comprehensive policies and procedures in place to ensure your personal data is secure, these include:

- Data encryption
- Firewalls
- Physical protection of the facilities where your data is stored
- 24/7 physical protection of the facilities where your data is stored (i.e. Microsoft's UK data centres)
- 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.

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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.

## 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.

## Your data protection rights

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

- Your right of access – You have the right to request a copy of the information that we hold about you. 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.
- Your right to rectification – You have the right to ensure that your personal information is accurate and up-to-date, or where necessary rectified. You also have the right to ask us to complete information you think is incomplete.
- Your right to erasure – 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.
- Your right to restriction of processing – You have the right to ask us to restrict the processing of your personal information in certain circumstances, for example limiting the material that you receive or where your information is transferred.
- Your right to object to processing – You have the right to object to the processing of your personal information in certain circumstances, for example for direct marketing purposes.
- Your right to data portability – You have the right to request that any information the Firm holds about you be transferred to another organisation, in a commonly used and machine-readable format, in certain circumstances.
- Your right to object profiling – You have the right to object to any decisions based on the automated processing of your personal data, including profiling.
- Your right to complaints – 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 the Firm manages or processes your personal data.
- Please contact us at [ir@narrow-water.com](mailto:ir@narrow-water.com) or 13 The Causeway, Teddington, London, TW11 0JR if you wish to make a request.

# Narrow Water Partners

## How to complain

If you have any concerns about our use of your personal information, you can make a complaint to us at [ir@narrow-water.com](mailto:ir@narrow-water.com) or 13 The Causeway, Teddington, London.

You can also complain to the ICO if you are unhappy with how we have used your data.  
The ICO's address:

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

ICO website: <https://www.ico.org.uk>  
Helpline number: 0303 123 1113