



Ranmore Fund Management Privacy Notice/GDPR Policy

Ranmore Fund Management Ltd ("RFM") is committed to a policy of protecting the rights and privacy of individuals in accordance with the General Data Protection Regulation (GDPR).

The GDPR states that the first principle of data protection is that personal data must be processed fairly and lawfully. In order for processing to be fair, RFM, as a data controller, must make certain information (in the section below) available to data subjects. This will be achieved via the publication of a privacy notice, which the GDPR states must be written in a clear and plain manner.

RFM collects and processes information about individuals for the following purposes, such as, but not limited to:

- The employment and remuneration of staff
- The distribution of the monthly factsheet and tracking of interactions once received (via third-party applications)
- The apportionment of the intermediary fee accrual in relation to the Advisor Class
- Monitoring subscriptions and redemptions for the purposes of reviewing assets under management
- Website cookies and analytics tools which collect information about page visits. This is limited to identification of IP addresses only, but IP addresses constitute personal data under the GDPR.
- To record telephone conversations to defend RFM in order to comply with legal requirements.

RFM must ensure that all the information collected is used in accordance with the consent of the individuals concerned, stored safely and securely, and is not shared with any third parties unlawfully.

Is Ranmore Fund Management a 'data processor' or 'data controller'?

RFM confirms that in connection with the processing of personal information in relation to sending monthly factsheets and analysing interactions with the factsheet or website (www.ranmorefunds.com), it is processing information for its own purposes and as such will be a data controller.

When RFM processes personal data in relation to services provided on behalf of Ranmore Global Equity Fund plc, it will be acting as a data processor.

Lawful processing of personal data

The GDPR states that the first principle of data protection is that personal data must be processed fairly and lawfully. RFM is committed to processing data based on one of the following conditions

- To enable us to adhere to regulatory or legal obligations or requests;
- As part of the delivery of services as investment manager of Ranmore Global Equity Fund plc;
- For other legitimate business activities, where individuals have agreed to us processing their personal information for agreed upon purposes, which shall include factsheet distribution and direct marketing;

Accuracy of personal information

RFM undertakes to maintain as accurately as possible all personal data held. RFM will rely on those who permit the processing of their data to inform RFM if that data should be inaccurate, for example as a result of a change of email address or change of surname. RFM commits to updating any such requests as soon as practically possible.

Security of information

RFM has implemented technological and security measures commensurate with the nature, scale and complexity of the personal information it processes, to protect the misuse or loss of that personal information. Only certain personnel are provided access to such information and such personnel will maintain the confidentiality of this information.

Sharing or transfers of personal information

RFM may share or transfer data with the following third parties:

- Other service providers identified in the prospectus of Ranmore Global Equity Fund plc (primarily, but not exclusively, the Administrator);
- Government agencies, tax authorities and other such bodies where a request is made and there is a legal obligation to do so;
- Other third parties, including those outside the EEA. Countries outside the EEA may not have the same data protection laws as those within. Such transfers will only be permitted where they are approved by senior management; are in accordance with this privacy notice/GDPR policy; are permitted in accordance with applicable data protection legislation, namely that in those countries not recognised as having the same level of protection as those subject to GDPR, that contractual clauses are included prior to the transfer to provide the required level of protection.

Right of access to data and rectification of data

RFM recognises that individuals have the right to request a copy of the information RFM holds. We endeavour to respond to such requests as promptly as possible and within statutory timescales.

In addition, individuals have the right to request the rectification of any personal information we hold which they deem to be inaccurate; to delete personal information we hold; to restrict how it is processed; or to withdraw consent to its processing. All such requests will be met, subject to any obligations we must meet with respect to record keeping for regulatory or legal purposes.

Retention of data

RFM will retain personal data for as long as is necessary to meet regulatory and legal requirements. Contact information, such as mailing lists, will be kept until such time as a user requests its deletion; in the event of a user unsubscribing, that information will be retained as a record to meet that request not to contact that user again.

Ongoing communication

We are required to obtain the active consent of persons for the purposes to which we will contact them with information. If they do not opt-in to receive these, we will not send them.

Unsubscribing

If individuals wish to unsubscribe from mailing lists, they should select the unsubscribe option within any communications sent. In such instances, we will retain that information to satisfy the request.

Individuals may contact Ranmore Fund Management Ltd at ops@ranmorefunds.com to cease receiving communications at any time or to specify a wish to only receive certain forms of communications.

Contacting us

If you have any questions, complaints or requests, please contact: Ranmore Fund Management Ltd, Coveham House, Downside Bridge Road, Cobham, KT11 3EP. Ops@ranmorefunds.com +44 1932 864 651

Individuals have the right to lodge a complaint with the UK's data protection regulator, The Office of the Information Commissioner (ICO) www.ico.org.uk