

## DATA PROTECTION NOTICE

This notice sets out how each of:

- a) Overstone CCF Management Limited, in its capacity as the manager of Overstone Common Contractual Fund (the “**CCF**”);
- b) Overstone Fund plc (the “**QIAIF**”); and
- c) Overstone UCITS Fund plc (the “**UCITS**”)

(each of the CCF, the QIAIF and the UCITS are referred to as the “**Fund**”)

will process personal information (as a Data Controller). For the purposes of this notice references to the Fund shall, where appropriate, in the case of the CCF be construed as Overstone CCF Management Limited acting on behalf of the CCF.

Where your details are provided to the Fund as a consequence of your investment in the Fund, then the Fund, acting as a data controller may itself (or through a third party such as Northern Trust International Fund Administration Services (Ireland) Limited (the “**Administrator**”) acting in its capacity as the Fund’s administrator) process your personal information or that of your directors, officers, employees and/or beneficial owners. When processing your personal information, there may also be times where the Administrator will act as a data controller. In connection with this, please note the following:

### **Purposes of Processing and Legal basis for processing**

Your personal data may be processed by the Fund or the Administrator (or any of their affiliates, agents, employees, delegates or sub-contractors) for the following purposes:

- to facilitate the opening of your account with the Fund, the management and administration of your holdings in the Fund and any related account on an on-going basis (the “**Services**”) which are necessary for the performance of your contract with the Fund, including without limitation the processing of redemption, conversion, transfer and additional subscription requests and the payment of distributions;
- in order to carry out anti-money laundering checks and related actions which the Fund considers appropriate to meet any legal obligations imposed on the Fund relating to the pursuit of the Fund’s legitimate interests in relation to, the prevention of fraud, money laundering, terrorist financing, bribery, corruption, tax evasion and to prevent the provision of financial and other services to persons who may be subject to economic or trade sanctions, on an on-going basis, in accordance with the Fund and the Administrator’s anti-money laundering procedures;
- to report tax related information to tax authorities in order to comply with a legal obligation;
- to monitor and record calls and electronic communications for (i) processing and verification of instructions, (ii) investigation and fraud prevention purposes, (iii) for crime detection, prevention, investigation and prosecution, (iv) to enforce or defend the Fund and its affiliates’, itself or through third parties to whom it delegates such

responsibilities or rights in order to comply with any legal obligation imposed on the Fund, or (v) to pursue the Fund's legitimate interests in relation to such matters;

- to disclose information to other third parties such as service providers of the Fund, auditors, regulatory authorities and technology providers in order to comply with any legal obligation imposed on the Fund or in order to pursue the legitimate interests of the Fund;
- to monitor and record calls for quality, business analysis, training and related purposes in order to pursue the legitimate interests of the Fund to improve its service delivery;
- to update and maintain records and fee calculation based on contractual necessity;
- to retain AML and other records of individuals to assist with the subsequent screening of them by the Administrator including in relation to other funds or clients of the Administrator in pursuance of the Administrator's and its clients' legitimate interests. This may include further processing of personal data by the Fund for related purposes and which are necessary to comply with the Fund or the Administrator's legal obligations; and/or
- which are necessary for the Fund or the Administrator's legitimate interests indicated above.

### **Recipients of Data and International Transfer of Data**

The Fund may disclose your personal information as follows:

- to its service providers, including the Administrator, and their affiliates, and other third party service providers engaged by the Fund in order to process the data for the above mentioned purposes; and
- to competent authorities (including tax authorities), courts and bodies as required by law or requested or to affiliates for internal investigations and reporting.

The disclosure of personal information to the third parties set out above may involve the transfer of data to the USA and other jurisdictions outside the European Economic Area ("EEA") in accordance with the requirements of the General Data Protection Regulation. Such countries may not have the same data protection laws as your jurisdiction. The Fund has authorised the Administrator as its agent to put in place Standard Contractual Clauses with relevant parties to whom personal data will be transferred to ensure an appropriate level of data protection applies to any personal data transferred outside the EEA. Please contact the Administrator for copies of the Standard Contractual Clauses that have been entered into on behalf of the Fund.

### **Retention period**

The Fund and the Administrator will retain your personal information for as long as required for the Fund or the Administrator to perform the Services or perform investigations in relation to same depending on whether additional legal/regulatory obligations mandate that the Fund retains your personal information.

## **Data Subject Rights**

You have the following rights, in certain circumstances, in relation to your personal information:

- right to access your personal information;
- right to rectify your personal information;
- right to restrict the use of your personal information (in certain specific circumstances);
- right to request that your personal information is erased (in certain specific circumstances);
- right to object to processing of your personal information (in certain specific circumstances); and
- right to data portability (in certain specific circumstances).

These rights will be exercisable subject to limitations as provided for in the General Data Protection Regulation. In certain circumstances it may not be feasible for the Administrator or the Fund to discharge these rights, for example because of the structure of the Fund or the manner in which you holds shares in the Fund. Where processing of your personal data is based on the Fund's legitimate interests you may object to such processing by contacting [overstonefunds@oldfieldpartners.com](mailto:overstonefunds@oldfieldpartners.com).

Where the Fund or the Administrator requires your personal information to comply with AML or other legal requirements, failure to provide this information means the Fund may not be able to accept you as an investor in the Fund.

You have the right to lodge a complaint with a supervisory authority in the EU Member State of your habitual residence or place of work or in the place of the alleged infringement if you consider that the processing of personal data relating to you carried out by the Fund or its service providers infringes the General Data Protection Regulation.

### **How to contact us**

If you have any questions about our use of your personal information, please contact [overstonefunds@oldfieldpartners.com](mailto:overstonefunds@oldfieldpartners.com).