DATA PROTECTION STATEMENT

The terms of this Data Protection Statement apply to any information you give to Heritage or any of its employees. It will also apply to any information you have already provided to us. We may amend our Data Protection Statement from time to time to comply with any changes in the regulations or to improve our services to you. You should not provide us with personal information about any other person without first obtaining their consent for it to be disclosed and used as set out in this Data Protection Statement. We will use your personal information in accordance with our Data Protection Statement and in compliance with all applicable UK data protection legislation.

Heritage's clients are made aware of the data protection regulations when they become clients and complete our Investment Agreement. By completing the Heritage Investment Agreement, our clients agree that, in terms of the Data Protection Act 1998, we may collect, use, store and otherwise process the personal information clients provide. This information is for the purposes of providing the agreed services to them, administering their account and related purposes, such as verifying their identity.

We may collect and process the following information about you:

- Information you provide by completing our Investment Agreement and Tax Self-Certification Form. This information may include your name, address, contact details, date of birth, bank details, tax identification number and financial information.
- Records of any correspondence by email or other means from you or anyone else acting on your behalf.
- Details of transactions you carry out with us and investments made on your behalf.

We may process, transfer and disclose your information for the purposes of:

- Providing you with services, managing your account and complying with your instructions.
- Verifying your identity.
- Improving our services to you.
- Detecting and preventing fraud.
- Complying with laws and regulations

We will act responsibly when we process, transfer or disclose your information and will act strictly in accordance with the Data Protection Act 1998.

We may at any time check your record with a fraud prevention agency.

We may from time to time contact you about products and services we feel may be of interest to you.

Your personal information may be passed to and used by our agents and sub-contractors who administer or process information on our behalf, such as the managers and administrators of our investment funds. Where you have been introduced to us by an introducer such as an independent financial advisor, we may disclose information about you to that introducer, unless you instruct us otherwise in writing.

We may disclose your personal information to third parties in the following circumstances:

- To any broker, if we buy or sell any investments.
- If we are legally required to disclose or share your personal data in order to comply with any legal obligation or to protect the rights of Heritage or its clients.
- To investigate or prevent fraud, money laundering, terrorism or other illegal activity.
- If it is in the public interest to disclose such information.
- At your request or with your consent.

You have the right to access personal data that is held about you by writing to the Data Protection Officer, Heritage Capital Management Limited, Broadway House, Tothill Street, London SW1H 9NQ. We will respond to you within forty days of the receipt of your request. Please notify us of any inaccuracies or changes in the information we hold about you, so that we may update it.

For legal and regulatory reasons, Heritage keeps certain documents relating to a client's account for at least six years following the termination of their relationship with us, unless required by other laws and regulations such as the Data Protection Act 1998 not to do so. Clients will not be at liberty to request the destruction of deletion of any record relating to them unless Heritage are required to do so by law or other regulatory requirement. Heritage are also unable to inform clients what action we have taken, including whether we have deleted or destroyed ex-client records.

If you have any comments or queries about our Data Protection Statement, please contact the Data Protection Officer, Heritage Capital Management Limited, Broadway House, Tothill Street, London SW1H 9NQ.

Reviewed 21st May 2025