



RWC Partners Limited

Privacy Notice



RWC¹ is committed to protecting your privacy and maintaining the confidentiality and security of your personal information. Any personal information processed by RWC is controlled by us and we are the data controller of your personal information. RWC may utilize the services of service providers and/or administrators as data processors for the processing of your personal information described herein. Where this is the case, RWC – as data controller – retains responsibility for the data processors we appoint.

Our nominated representative is Kevin Tolan who can be contacted at: privacy@rwcpartners.com, or RWC Partners Limited, Verde, 10 Bressenden Place, London SW1E 5DH.

This Privacy Notice explains the manner in which RWC collects, utilizes and maintains non-public personal information about individuals based in the European Union (“EU”) or the European Economic Area (“EEA”), as required under the General Data Protection Regulation (EU) 2016/679 (“GDPR”).

Who we are and what we do

RWC is a UK-domiciled asset manager which offers a range of products that enable our institutional clients to invest in a range of strategies to help them meet their long term financial needs.

Information you give us or we collect about you

RWC collects your personal information from the following sources, as applicable:

For existing and/or former clients/investors, information provided by you via subscription and related documents, including (i) name, address, income, financial and investment qualifications, and tax-related information and (ii) in the case of individuals, birth date, nationality, passport or other identification number, and employment information, or in the case of entities, date and jurisdiction of formation, entity type, tax identification number, and business information);

Information provided by you via registration on our website (www.rwcpartners.com);

Information provided by you via interactions with our employees, e.g., members of our sales and investor support team;

Information we have collected from publicly available sources, such as social media websites

Why We Use Your Personal Information

Your Personal Information may be processed by RWC and/or its service providers/administrators for the following purposes, as applicable:

1. For existing investors:

to facilitate your investment, both initially and on an ongoing basis, as necessary to fulfil all contractual and regulatory obligations related to your investment including without limitation the acceptance and processing of subscription documents and redemption and transfer requests;

¹ ‘RWC’, ‘we’, ‘us’, ‘our’ is used to describe RWC Partners Limited and RWC Asset Management LLP



in order to carry out anti-money laundering checks and related actions which we and/or our administrators consider appropriate or necessary to fulfil any of their legal obligations on an ongoing basis (i) with respect to the prevention and/or detection of fraud, money laundering, terrorist financing, bribery, corruption, and/or tax evasion and (ii) to prevent the provision of financial and other services to persons who may be subject to economic or trade sanctions, all of the foregoing in accordance with the Investment Manager's and the Administrator's anti-money laundering policies and procedures;

to comply with our legal obligations and, in particular, to report tax-related information to tax authorities;

to disclose information to other third parties such as our service providers and/or administrators (including, for example, attorneys, accountants, auditors, or other professionals), regulatory authorities and technology providers in order to comply with any legal obligation imposed on us and/or administrators or in order to pursue the legitimate interests of us and/or administrators;

to monitor and record electronic communications and if applicable, calls, for any of the purposes specified herein; and/or

to inform you about other products and services that RWC has to offer.

2. For those who are not a client/investor:

to inform you about products and services that RWC has to offer.

Countries Having Access to Your Personal Information

RWC's servers, which store and keep Your Personal Information, are located in the UK, however, these are accessible via RWC group employees located outside of the EU and EEA, namely, the United States and Singapore.

RWC also has service providers and/or administrators whose personnel may have access to Your Personal Information and that are located in other jurisdictions. These jurisdictions either (i) afford an adequate level of protection for Your Personal Information (as declared by the European Commission) or, (ii) if they do not, then we have entered into an agreement with these service providers incorporating clauses the same or substantially similar to the standard contractual clauses, as well as other relevant provisions contained in the GDPR, and obligations no less onerous than those contained in this EU Privacy Policy.

Collecting Your Information Legally

RWC is able to legally collect and use Your Personal Information either because:

1. you have consented to us doing so; and/or
2. we have assessed that it is in our legitimate interests to process your personal data for limited marketing purposes in order to maintain, expand and develop our business;
3. collecting and using Your Personal Information is necessary for us to fulfil our contractual obligations to you by virtue of you being a client/investor;
4. It is necessary to comply with any applicable regulatory, judicial or other legal obligation.



Retention of Your Personal Information

The Investment Manager and/or our service providers/administrators will retain Your Personal Information for the purposes described herein for as long as required for the purposes outlined.

Your Rights

You have the right to:

1. be informed about Your Personal Information that RWC and/or its service providers/administrators collect from you, use, and retain;
2. obtain confirmation from RWC that Your Personal Information is being collected, used, and retained as described above and to access Your Personal Information held by us;
3. have Your Personal Information corrected if it is inaccurate or incomplete at any time;
4. erasure, or the right to be forgotten, which means you can request deletion or removal of any of Your Personal Information we hold about you at any time, subject to our and/or our service providers/administrators rights to retain Your Personal Information for legitimate business purposes;
5. block or suppress RWC collecting and using Your Personal Information, which means we can continue to store Your Personal Information but cannot further collect or use it in any way;
6. obtain and reuse any of Your Personal Information that we hold about you for your own purposes across different services, which allows you to move, copy or transfer Your Personal Information easily from us to another place identified by you in a safe and secure way without hindrance to the usability of Your Personal Information;
7. object to us collecting, using or retaining Your Personal Information where this is based on:
 - a. your legitimate interest or the performance of a task in the public interest; or
 - b. direct marketing even if otherwise legally permitted; and
8. withdraw your consent to the use of Your Personal Information at any time, as described below.

To make any requests as listed above, please contact RWC's Nominated Representative at: privacy@rwcpartners.com.

RWC will acknowledge receipt of any request relating to your rights above within one week of your request. We aim to satisfy all legitimate requests within one month. If this does not appear possible, we will inform you.

Withdrawal of Your Consent

You may request that we stop collecting, using and retaining Your Personal Information at any time by emailing us at privacy@rwcpartners.com. You should note that notwithstanding your withdrawal of consent, we may be legally required to retain and/or continue processing some or all of Your Personal Information.



Protection of Investor Information

RWC maintains appropriate technical and organizational measures to ensure a level of security appropriate to potential risks, including physical, electronic and procedural safeguards that comply with the GDPR to protect customer information, including:

1. the pseudonymization and encryption of Your Personal Information where appropriate;
2. ensuring ongoing confidentiality, integrity, availability and resilience of processing systems and services;
3. ensuring we can restore access to Your Personal Information in a timely manner if a physical or technical incident occurs; and
4. regular testing, assessment and evaluation of the effectiveness of its technical and organizational measures to attempt to ensure Your Personal Information is secure.

RWC restricts access to the personal and account information to those employees who need to know that information in the course of their job responsibilities. We will destroy, erase or make unreadable data, computer files and documents containing Your Personal Information that is non-public prior to disposal.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

Further Information

This Privacy Notice is a summary of RWC Data Protection Policy which can be found on our website at: www.rwcpartners.com.

Making a Complaint

If you would like to make a complaint about the way RWC has collected, used or retained Your Personal Information, please contact us at privacy@rwcpartners.com.

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 RWC or its service providers infringes the GDPR.