

Privacy Notice

7IM Investment Funds, 7IM Specialist Funds, 7IM Opportunity Funds and 7IM Funds
(referred to in this document as the “7IM UK Funds”).

7IM (Dublin) Funds plc
(referred to in this document as the “7IM Dublin Funds”).

Each of the above may be referred to as the “Fund” or together as the “Funds”.

Introduction

The purpose of this document is to provide you with information on our use of your personal data in accordance with the EU data protection regime introduced by the General Data Protection Regulation (Regulation 2016/679, the “Data Protection Legislation”).

In this document, “we”, “us” and “our” refer to the Fund and Seven Investment Management LLP and its affiliates and delegates.

Who this affects

If you are an individual investor, this will affect you directly. If you are an institutional investor that provides us with personal data on individuals connected to you for any reason in relation to your investment with us, this will be relevant for those individuals and you should transmit this document to such individuals or otherwise advise them of its content. You may be an investor in one or more Funds.

Your personal data

By virtue of making an investment in one or more Funds and your associated interactions with us (including the initial application for shares, and including the recording of electronic communications or phone calls where applicable) or by virtue of you otherwise providing us with personal information on individuals connected with you as an investor (for example directors, trustees, employees, representatives, shareholders, investors, clients, beneficial owners or agents), you will provide us with certain personal information which constitutes personal data within the meaning of the Data Protection Legislation. We may also obtain personal data on you from other public sources.

This includes the following information relating to you and/or any individuals connected with you as an investor: name, residential address, email

address, contact details, corporate contact information, signature, nationality, place of birth, date of birth, tax identification, credit history, correspondence records, passport number, bank account details, source of funds details and details relating to your investment activity.

How we may use your personal data

The Fund, as the data controller, may collect, store and use your personal data for lawful purposes disclosed below:

(i) to reflect your ownership of shares in the Fund (i.e. where this is necessary for the performance of the contract to purchase shares in the Fund or to process redemption, conversion, transfer and additional subscription requests or the payment of distributions);

(ii) to discharge our anti-money laundering obligation to verify the identity of our customers (and, if applicable their beneficial owners) or for prevention of fraud or for regulatory or tax reporting purposes or in response to legal requests or requests from regulatory authorities (i.e. where this is necessary for compliance with a legal obligation to which we are subject); and/or

(iii) for direct marketing purposes (that is, providing you with information on products and services) or for quality control, business and statistical analysis or for tracking fees and costs or for customer service, training and related purposes (i.e. where this is necessary for the purposes of the legitimate interests of us or a third party and such legitimate interests are not overridden by your interests, fundamental rights or freedoms and provided that we are acting in a fair, transparent and accountable manner and have taken appropriate steps to prevent such activity having any unwarranted impact on you and also noting your right to object to such uses, as discussed below).

Northern Trust International Fund Administration Services (Ireland) Limited (the "**Administrator of the 7IM Dublin Funds**") and Northern Trust Global Services PLC (the "**Administrator of the 7IM UK Funds**") may each use your personal data where this is necessary for compliance with a legal obligation to which each Administrator is directly subject (i.e. to comply with applicable law in the area of anti-money laundering and counter terrorist financing, where required for global tax reporting purposes or where mandated by a court order or regulatory sanction). The Administrators will each act as a data controller in respect of these specific uses of personal data.

Northern Trust Fiduciary Services (Ireland) Limited (the "**Depository of the 7IM Dublin Funds**") and Northern Trust Global Services PLC (the "**Depository of the 7IM UK Funds**") may each use your personal data where this is necessary for compliance with a legal obligation to which each Depository is directly subject (i.e. to comply with applicable law in the area of anti-money laundering and counter terrorist financing or where required for global tax reporting purposes). The Depositories will each act as a data controller in respect of these specific uses of personal data.

Should we wish to use your personal data for other specific purposes (including, if applicable, any purpose that requires your consent), we will contact you.

Why we may transfer your personal data

We may share your personal data with our affiliates and delegates.

In certain circumstances we and/or our authorised delegates may be legally obliged to share your data and other financial information with respect to your interest in the Fund with the relevant taxation authorities and they, in turn, may exchange this information with foreign tax authorities including tax authorities located outside the European Economic Area (the "**EEA**").

We anticipate that the following affiliates and delegates will process your personal data on our behalf and this may include certain entities located outside the EEA:

- the Administrator of the 7IM UK Funds;
- the Administrator of the 7IM Dublin Funds;

- the manager of the 7IM Dublin Funds, Link Fund Manager Solutions (Ireland) Limited
- the Fund's investment manager and distributor, Seven Investment Management LLP and their respective affiliates.

The data protection measures we take

We anticipate that your information shall be sent internationally, including to countries outside of the EEA in particular, the above referenced Northern Trust entities have indicated that they will do this. Any transfer of personal data by us, any Northern Trust entities or any of our other duly authorised delegates outside the EEA shall be subject to appropriate safeguards being in place in accordance with the conditions in the Data Protection Legislation. Please contact us if you wish to obtain more information on the appropriate safeguards. See "Getting in touch" below.

We and our duly authorised delegates shall apply appropriate information security measures designed to protect data in our/our delegates' possession from unauthorised access by third parties or any form of computer corruption.

We shall notify you of any personal data breach affecting you that is likely to result in a high risk to your rights and freedoms.

Your data protection rights

You have certain rights regarding our use of your personal data summarised as follows:

- the right to access your data (in an easily readable form);
- the right to examine and correct your data;
- the right to data portability;
- the right to restrict the use of your data;
- the right to withdraw any consent given to the processing of your data (where applicable);
- the right to receive information regarding any entities we disclose your data to;

the right to lodge a complaint in Ireland with the Data Protection Commission in respect of the 7IM Dublin Funds (for more information see <https://dataprotection.ie/docs/complaints/1592.htm>) or in the United Kingdom with the Information

Commissioner in respect of the 7IM UK Funds (for more information see www.ico.org.uk/concerns).

You also have the right to object to the processing of your data where we have considered this to be necessary for the purposes of our legitimate interests.

Please note that the right for your data to be erased (the "right to be forgotten") that applies in some contexts is not likely to be applicable to most, if not all, of the personal data we hold, given the specific nature of the purposes for which we use the data, as described above.

Our retention of your personal data

We or our duly authorised delegates may retain your personal data for a period of up to seven years following your disinvestment from the Fund or the point where your business relationship with us has ceased. Thereafter, we and our duly authorised affiliates and delegates will refrain from collecting any further personal data on you and shall take appropriate steps to dispose of any records containing your personal data, to the extent this is operationally feasible and proportionate.

11 April 2019

Changes to this Privacy Notice

We may need to make changes to this Privacy Notice from time to time and shall do so by amending the version of this Privacy Notice published on our website <https://www.7im.co.uk/7IM-Funds-Privacy-Notice> and we would therefore invite you to review this regularly so you are informed of the latest position as it affects you.

Cookies Policy

We have in place a separate cookies policy which is available on our website <https://www.7im.co.uk/7IM-Cookie-Policy> and details the use of cookies on our website.

Getting in touch

The Funds are not required to designate a data protection officer. However, should you have any queries or wish to discuss your data protection rights with us, please contact us at information@7IM.co.uk