



Privacy Notice

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Contents

Data protection privacy notice 3

What is personal information? 3

Who we are 3

What types of information do we use? 3

Consequences of not providing some types of information 4

How do we collect information about you? 4

How we will use your personal information 4

Marketing 5

Who we share your information with 8

Sending your information outside of the EEA 8

Storing your information 8

Your rights 8

Security 9

Data protection privacy notice

We are committed to protecting your personal information and ensuring we respect your privacy. This Privacy Notice explains how we will look after and use any personal information that we collect about you.

What is personal information?

Personal information means any information about you from which you can be identified. Examples of personal information include your name, home address, social security number, date of birth, telephone number and e-mail address but it also includes other pieces of information which can be used to identify you, either directly or indirectly, such as a cookie.

Who we are

BarclayHedge is the Controller of the personal information you provide to us. If you have any questions about this Privacy Notice or the information we hold about you please contact media@barclayhedge.com using the details set out below:

Full name of legal entity: BarclayHedge, Ltd.

Name or title of relevant contact: Sol Waksman

Email address: media@barclayhedge.com

Postal address:

2094 185th Street, Suite 1B

Fairfield, IA 52556 USA

Contact telephone numbers: +1.641.472.3456

While the obligation to appoint a Data Protection Officer ("DPO") does not apply to BarclayHedge on the basis our processing which is occasional, does not include, on a large scale, processing of special categories of data or processing of personal data relating to criminal convictions and offences, and is unlikely to result in a risk to the rights and freedoms of natural persons, we have an obligation to inform you that you have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues. We would however appreciate the chance to deal with your concerns before you approach the ICO, so please contact us in the first instance.

What types of information do we use?

We collect information from you when you register on our site, place an order, subscribe to our newsletter, fill out a form or request a product sample.

When ordering or registering on our site, as appropriate, you may be asked to enter your: name, e-mail address, mailing address, phone number or credit card information. You may, however, visit our website anonymously. Therefore, the information which we collect, use and store about you are:

- Contact information
- Professional field

We are in compliance with the requirements of COPPA (Children's Online Privacy Protection Act). Our website, products and services are all directed to people who are at least 13 years old or older.

Our products and services are not intended for children and we will not knowingly collect any data related to children.

We do not collect any special categories of personal data. This includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic or biometric data.

Consequences of not providing some types of information

Where we need to collect your personal information by law, or under the terms of a contract we have with you, and you fail to provide that information when requested, we may not be able to provide the goods or services you asked for. In this case we may have to cancel the product or services but we will tell you if this is the case.

How do we collect information about you?

Typically, we will collect information from you when you contact us directly or provide information in order for us to provide our products and services. We collect information from and about you in the following ways:

Through **direct interactions** when you give us your personal information by filling in forms or during correspondence with us. This includes when you:

- Apply for our products and services;
- Subscribe to our services;
- Create an account;
- Meet with us in person or talk to us face to face;

How we will use your personal information

We only obtain, use and keep personal information where we need it for a specific purpose. We use the information collected through this website, including your personal information, non-personal information, and information about your use of this website, in the following ways:

- to enhance your experience with this website;
- to save your preferences and account information;
- to provide you with the services, products, or information that you request;
- to communicate with you (e.g. about updates to your accounts, products, or services, or to provide information about products or services in which you have indicated an interest);
- to conduct research and analysis (e.g., analyze and compile statistics about your use of this website, and produce data analytics and reports containing only anonymous and aggregate information that we may share with third parties for their own use); and/or
- to provide information, special offers, and promotions to you regarding products and services offered by us, our affiliates, or non-affiliated third parties

For EU based clients, under GDPR we are only able to use your personal information if we have a legal reason or basis for doing so. EU regulations require that we have a legal basis so that your privacy is protected. Most commonly we will use your information in the following ways:

- We have a **contract** with you. For example, we have agreed to provide access to our website to you through your acceptance of our Terms of Use at the time of registration and review of this Privacy Policy.

- We have a **legal obligation**. We need to use your personal information to comply with laws that assist in the prevention of financial crime and to comply with regulatory obligations. For example, this might include confirming your identity and source of wealth, as well as ensuring we provide you with necessary information so you understand the risk of the financial services we can provide.
- We, have a **legitimate interest** in processing the information and your interests and fundamental right do not override those interests. For example, processing your information – to develop our products and services and grow our business.

We set out in the table below all the ways we plan to use your personal information and the legal bases we rely on to do so. We also explain what our legitimate interests are where appropriate:

Purpose	Lawful basis for processing including our legitimate interests
To on-board you as a new customer	To fulfil our contact with you
To meet our regulatory obligations to provide you with regular information about your investment	To fulfil our regulatory obligations
To contact you about other products and services we think you may be interested in	Necessary for our legitimate interests – to develop our products and services and grow our business.
To use data to improve our website	Necessary for our legitimate interests – to understand how our customers interact with our website

We will only use your personal information for the reason for which we collected it. We will only use it for another reason if we believe that new reason is compatible with the original purpose. If we do need to use your personal information for a non-related purpose we will tell you about it and explain the legal basis which allows us to do so.

Marketing

We will always seek your consent to use your personal information for this purpose. We will very clearly explain why we are seeking your consent and ensure that you are provided with a simple method of providing this – which was done at the time of registering to our website by agreeing to our Terms of Service.

You are free to change your mind at any time by emailing us at media@barclayhedge.com

We can use your personal information to send you communications if we believe we have a 'legitimate interest'. We are required to make an assessment with regards to the benefits for us weighed against how appropriate it is to contact you in this way and whether it would be unfair to you. We believe that as a commercial enterprise we do have a legitimate interest in contacting you about

our products or services and we will only do so if we decide it would be of interest or beneficial for you.

We want to contact you about products or services we feel will be of interest to you or of benefit. We use your personal information to communicate with you if we have either your consent or a 'legitimate interest'. We believe that as a commercial enterprise we do have a legitimate interest in contacting you about our products or services and we will only do so if we decide it would be of interest or beneficial for you. However, we will also gain your consent to do so. We will always ensure we seek consent from you in a way which is clear and explains why we are seeking consent to use your personal information. We will very clearly explain why we are seeking your consent and ensure that you are provided with a simple method of providing this – which was done at the time of registering to our website by agreeing to our Terms of Service.

You are free to change your mind at any time by emailing us at media@barclayhedge.com

Third party marketing

At the time of registering to our website by agreeing to our Terms of Service, you agree that we may share your personal or other information with our affiliates for their own marketing and other purposes as permitted or required by law. We may share your personal or other information with non-affiliated third parties as permitted or required by law, including:

- with our service providers that help us to operate our business (e.g., to deliver the information, products, or services requested by you, to perform other activities related to such information, services, and products, including billing and collection, and to provide you with special offers or promotions from BarclayHedge);
- with a purchaser of BarclayHedge (or any of its assets), so it may continue to serve you;
- to comply with legal orders (e.g., a subpoena or court order), government requests, or other legal process;
- to produce relevant documents or information in connection with litigation, arbitration, mediation, adjudication, government or internal investigations, or other legal or administrative proceedings;
- to protect the interests, rights, safety, or property of BarclayHedge or others;
- to enforce any legal notices, terms of service, or agreements on or related to this Site;
- to operate BarclayHedge systems properly; and/or
- any other sharing to which you consent.

We may also share your personal or other information with non-affiliated third parties for their use to produce data analytics and reports containing only anonymous and aggregate information that does not personally identify you, and which they, in turn, may share with other third parties for their own use.

You may instruct BarclayHedge at any time not to share your personal information covered by this User Agreement with such third parties for their use to produce such data analytics and reports containing only anonymous and aggregate information by e-mailing us at media@barclayhedge.com. All e-mail requests must include the following information: first name, last name, and e-mail address. Please note that (i) this opt-out process may take some time to complete, consistent with applicable law; and (ii) even after such opt-out process is completed, your personal and other information may continue to be shared with our affiliates (including affiliated websites under common ownership or control) and service providers and as otherwise described in our Terms of Service agreement.

Third Party Links

Occasionally, at our discretion, we may include or offer third party products or services on our website. These third party sites have separate and independent privacy policies. We therefore have no responsibility or liability for the content and activities of these linked sites. Nonetheless, we seek to protect the integrity of our site and welcome any feedback about these sites.

Cookies

Through **using our website**, we collect information using cookies or similar technologies which tell us about your equipment, browsing actions and patterns.

BarclayHedge or our service providers may use "cookies," web server logs, web beacons, or other electronic tools to collect non-personal information about you, such as:

- IP address;
- browser type;
- operating system;
- computer platform;
- information about your mobile device;
- geo-location data; and
- the state or country from which you accessed this website

BarclayHedge or our service providers may also use cookies, web server logs, web beacons, or other electronic tools to collect and compile statistical and other non-personal information about your use of this website and the services provided on this website, such as:

- the web pages you visit on this website;
- the date and time of your visit;
- the number of links you click within this website;
- the functions you use on this website;
- the databases you view and the searches you request on this website;
- the data you save on, or download from, this website, etc.; and
- the websites you visited immediately before visiting this website.

Cookies are small text files placed on your computer (or other device where you access the internet) used to collect information on your activities online. They can also be used as part of website functionality – for example if you use online service to access <your bank account/fund information/your platform account> so you should be careful about accepting, deleting or removing them. We can collect information about the device you are using to access the internet, your IP address and website browser (for example). Cookies can tell us what information you were looking at, for how long, which internet sites interest you which are useful for us particularly for marketing our products and to ensure we are delivering the right service to clients.

For example, we offer a mixture of services to clients and cookies can tell us how many visitors to the website accessed the information and tools we provide. It may be the information on our website is not clear and we need to improve it – or there may be a genuine need to improve our range of products in the interests of our customers.

If you have concerns about cookies this web site explains how you can delete and control the cookies that are stored on your computer: <https://www.aboutcookies.org/> >

Who we share your information with

We may need to provide information to third parties for a variety of reasons, for example, we may need to provide information to assist in the detection or prevention of crime or for the purpose of safeguarding national security. Please refer to the table in the section 'How we will use your personal information' which explains how we use your data. The third parties we share your information with are as follows:

- Alternative Investment conference organizers

Sending your information outside of the EEA

The regulations which have been put in place to protect your privacy apply throughout the EEA. The EEA is the European Economic Area which includes all the countries in the European Union plus Iceland, Liechtenstein and Norway. This means that any country within the EEA must meet the same privacy standards as the United Kingdom. All the personal information that we hold about you will be processed in the United States.

Storing your information

By agreeing to our Terms of Service agreement at the time of registering to our website, this is our contract with you and will need to keep your personal information (updated to ensure accuracy) to fulfil our contract.

Our policy is to keep records for up to as long as you are a client. On a monthly basis as part of our marketing process, we email everyone in our database. If the email is returned to us as invalid or no longer in use, we remove that individual completely from our records. We will ensure all records are safely destroyed if we no longer need to retain them. We review our retention periods for personal information on a regular basis. We will tell you if we change the retention period.

When we decide how long we will retain your personal information, we will take into account the amount, nature, sensitivity of your information and how we want to use it as well as the potential risk of harm being caused from unauthorised use or disclosure.

Your rights

If you are caught under GDPR you are provided with a number of different rights under the data protection laws in relation to your personal information. These allow you:

- To access your information;
- To request we correct your information;
- To request that we erase your information;
- To object to the processing of your information;
- To request a restriction in the processing of your information;
- To request a transfer of your information; and
- To withdraw your consent.

If you wish to exercise any of these rights please email us at media@barclayhedge.com. Please note that you will not have to pay a fee to access your personal information or to exercise any of the other rights. We may, however, charge a reasonable fee if your request is clearly unfounded, repetitive or excessive or we may refuse to deal with your request. We may also need to seek further information from you to confirm your identity before we release any personal information. This does not affect your right to make a complaint.

Security

We have put in place appropriate security measures to protect your personal information from being accidentally lost, used or accessed in an unauthorized way, altered or disclosed. We have a procedure to deal with any suspected personal data breach and will notify you, and other regulators, where we are legally required to do so.