

# Cantillon Capital Management LLP

## Investor Privacy Notice

“CCM”, “we”, “us” and “our” means Cantillon Capital Management LLP and its U.S. affiliate, Cantillon Capital Management LLC. We are committed to respecting your privacy.

We are registered in the UK and our registered address is at 2nd Floor Eagle House, 108-110 Jermyn Street, London, SW1Y 6EE and our company registration number is OC304786.

### About this privacy notice

For the purposes of data protection law, we are a controller in respect of your personal data. CCM is responsible for ensuring that it uses your personal data in compliance with applicable data protection law, including but not limited to the General Data Protection Regulation 2016/679 (“**GDPR**”) as incorporated under UK law and the Data Protection Act 2018.

This Privacy Notice applies if you are:

- an individual investor; or
- a director, officer, employee and/or beneficial owner of a corporate investor

in Cantillon Funds Plc or Cantillon Global Equity L.P. (each, the “**Fund**”) or any account which is separately managed by us (“**SMAs**”), since we will be a controller of your personal data acting in our capacity as the Fund’s Investment Manager or the Investment Manager of your SMA.

This Privacy Notice sets out the basis on which any personal data about you that you provide to us, that we create, or that we obtain about you from other sources, will be processed by us. Please take the time to read and understand this Privacy Notice.

### Personal data that we collect about you

We will collect and process the following personal data about you:

- **Information that you provide to us or one of our affiliates.** This includes information about you that you give us by virtue of making an investment in the Fund or an SMA and your associated interactions with us (including subscription documents and investment management agreements) and including the recording of electronic communications or phone calls (where applicable) or by virtue of you otherwise providing us with your personal information or by communicating with us, whether face-to-face, by phone, e-mail or otherwise. This information may include, but is not restricted to data such as:
  - your name, residential address, business address, email address, place of birth, date of birth, tax identification numbers, bank account details, copies of passports and/or utility bills and details relating to your investment activity.
- **Information we collect or generate about you.** This information may include, but is not restricted to:
  - personal data that we collect through your use of our website or email system;
  - information obtained in the course of our business and investment activities;

- search results of the records of regulators (e.g., US Internal Revenue Service, UK Financial Conduct Authority) records, recruitment and screening agencies and social media searches;
  - information obtained as part of due diligence, know-your-customer and related processes; or
  - technical information collected via our website about the services you use and how you use them.
- **Information we obtain from other sources.** This may include, but is not restricted to:
    - information provided by third parties (e.g., fraud prevention agencies) that we may use when verifying your identity and when carrying out anti money laundering checks. Such information may include some details about any criminal convictions and any allegations regarding criminal activity that relate to you, as well as details of your status as a politically exposed person. It may also include your nationality and identification records (e.g., passport information);
    - information we may receive information from Fund Administrators, brokers and introducers for the purposes of entering in to and administering investment advisory services. This may include your name, address, e-mail address and phone number, financial information and identification records; or
    - information about you that we may obtain from public databases.

## Uses of your personal data

Your personal data may be stored and processed by us in the following ways and for the following purposes:

- to meet our legal obligations owed to you and to perform our obligations and exercise our rights under our contract or arrangement with you, or the relevant counterparty, if different;
- to conduct screening checks, e.g., "Know-your-customer", in order to verify information provided by you for due diligence purposes or in order to confirm your suitability for any future investments, appointment as a service provider or admission as a preferred counterparty;
- to comply with legal, regulatory or self-regulatory practices and industry standards or procedures which relate to our investment management business;
- to contact you about services and products we offer;
- to allow you secure access to our website and to prevent any potential disruption or cyberattack;
- for statistical monitoring of our web-site trafficking; and
- for the management and administration of our business.

We are entitled to use your personal data in these ways for the following reasons:

- to discharge our legal and regulatory obligations;
- to perform our obligations in connection with a contract between us, the Fund Administrator or with a relevant counterparty;
- for the legitimate business interests of CCM, such as:
  - allowing us to effectively and efficiently carrying out our investment management services;
  - to establish, exercise or defend our legal rights or for the purpose of legal proceedings; or
  - maintaining compliance with all legal and regulatory obligations, industry standards, internal policies and procedures to prevent fraud; or
- in respect of any processing of sensitive personal data falling within special categories, if there is a legislative justification for its processing.

## Disclosure of your information to third parties

We may disclose your personal data to our affiliates in the circumstances described below:

- to manage and administer our investment management services;
- to ensure the delivery of products or services to our clients;
- for internal research and statistical analysis purposes;
- to ensure the safety and security of our data;
- to assess compliance with applicable laws, rules and regulations, internal policies and procedures across our business; and
- to enable adequate communication with you.

We will take steps to ensure that the personal data is accessed only by employees of such affiliates that have a need to do so and subject to general confidentiality arrangements for the purposes described in this notice.

We may also share your personal data outside of CCM and our affiliates:

- for due diligence purposes;
- to third party agents or contractors (e.g., our outsourced middle office provider, the Fund Administrator or the providers of our electronic data storage services) for the purposes of providing services to us. These third parties will be subject to confidentiality requirements and they will only use your personal data as described in this privacy notice; and
- to the extent required by law, for example if we are under a duty to disclose your personal data in order to comply with any legal obligation, establish, exercise or defend our legal rights.

## Transfers of personal data outside the UK and European Economic Area

The personal data that we collect from you may be transferred to, and stored at, a destination outside the UK and/or European Economic Area (“EEA”). It may also be processed by staff operating outside of the UK and/or EEA who work for our affiliates or for one of our suppliers.

Where we transfer your personal data outside the UK and/or EEA, we will ensure that it is protected in a manner that is consistent with how your personal data will be protected by us in the UK and/or EEA. This can be done in a number of ways, for instance:

- the country that we send the data to might be approved by the UK Government and / or European Commission; or
- the recipient might have signed up to a contract based on “model contractual clauses” approved by the UK Government and / or European Commission, obliging them to protect your personal data.

In other circumstances the law may permit us to otherwise transfer your personal data outside the UK and / or EEA. In all cases, however, we will ensure that any transfer of your personal data is compliant with data protection law.

You can obtain more details of the protection given to your personal data when it is transferred outside the UK and/or EEA (including a copy of the standard data protection clauses which we have entered into with recipients of your personal data) by contacting us in accordance with the “Contacting us” section below.

## Retention of personal data

How long we hold your personal data for will vary. The retention period will be determined by various criteria including:

- the purpose for which we are using it – we will need to keep the data for as long as is necessary for that purpose; and
- legal obligations – laws or regulation may set a minimum period for which we have to keep your personal data.

## Your rights

You have a number of legal rights in relation to the personal data that we hold about you. These rights include:

- the right to obtain information regarding the processing of your personal data and access to the personal data which we hold about you;
- the right to withdraw your consent to our processing of your personal data at any time. Please note, however, that we may still be entitled to process your personal data if we have another legitimate reason (other than consent) for doing so;
- in some circumstances, the right to receive some personal data in a structured, commonly used and machine-readable format and/or request that we transmit those data to a third party where this is technically feasible. Please note that this right only applies to personal data which you have provided to us;
- the right to request that we rectify your personal data if it is inaccurate or incomplete;
- the right to request that we erase your personal data in certain circumstances. Please note that there may be circumstances where you ask us to erase your personal data but we are legally entitled to retain it;
- the right to object to, and the right to request that we restrict, our processing of your personal data in certain circumstances. Again, there may be circumstances where you object to, or ask us to restrict, our processing of your personal data but we are legally entitled to continue processing your personal data and / or to refuse that request; and
- the right to lodge a complaint with the data protection regulator (details of which are provided below) if you think that any of your rights have been infringed by us.

You can exercise your rights by contacting us using the details set out in the “Contacting us” section below.

You can find out more information about your rights by contacting the Information Commissioner’s Office, or by searching their website at <https://ico.org.uk/>.

## Contacting us

If you would like further information on the collection, use, disclosure, transfer or processing of your personal data or the exercise of any of the rights listed above, please address questions, comments and requests to Kevin S. Aarons, Chief Operating Officer and Chief Compliance Officer of Cantillon on 212-603-3300 or by email to [ClientService@cantillon.com](mailto:ClientService@cantillon.com).