

Privacy Notice

Background

1.1 This Privacy Notice explains how Jupiter Fund Management Plc, its subsidiaries and its affiliates, and/or any funds operated or managed by them, as relevant (referred to collectively as "**Jupiter**" "**we**", "**us**" or "**our**"), each a controller, collect and process certain Personal Data. Jupiter is responsible for ensuring that it uses that Personal Data in compliance with data protection laws.

1.2 At Jupiter we respect the privacy of individuals and we are committed to keeping all your Personal Data secure. This Privacy Notice ("**notice**") applies to individuals outside our organisation with whom we interact, including but not limited to visitors to our website; clients and their personnel; vendors and service providers; visitors to our offices; and registrants for Jupiter events (together, "**you**").

1.3 We use the following definitions in this Privacy Notice:

"**Personal Data**" means any data which relates to a living individual who can be identified from that data or from other information which is in the possession of, or is likely to come into the possession of, Jupiter (or its representatives or service providers). In addition to factual information, it includes any expression of opinion about an individual and any indication of the intentions of Jupiter or any other person in respect of an individual.

2 The products and services we provide

2.1 This Privacy Notice concerns the following categories of information that we collect about you when providing the following products and services (together, the "**services**"):

- (a) Information we receive through our websites ("**Jupiter Websites**");
- (b) Information we receive through our fund related products ("**Jupiter Products**");
- (c) Information we receive through our support, mobile security solution or cloud-based services ("**Jupiter Services**").

3 The types of personal data we collect

| Purpose / processing activity | Type of data | Lawful basis |
|--|--|---|
| To onboard you as a new customer, to manage our relationship with you | Basic contact details (first name, last name, job title, company name, email address, phone number, address) KYC information as appropriate (Criminal Records Bureau checks, passport details, utility bills) | Performance of a contract with you Compliance with our legal obligations |
| To administer our business and this website (including analysis, testing, maintenance, support, reporting and hosting of data) | Name, contact details, IP address, login data, browser type, operating system | Legitimate interests – business administration in relation to our website and IT networks including security Compliance with our legal obligations |
| To make enquiries with you to ensure you are satisfied with our services | Basic contact details (first name, last name, job title, company name, email address, phone number, address); client records contact history | Performance of a contract with you Legitimate interests – understanding how our customers use our products/services, to develop them and grow our business |
| To send you information about Jupiter Products in which you may be interested | Name, email address | Legitimate interests – developing our products and services and growing our business |
| To send you marketing communication | Name, email address | Consent if marketing is directed to individuals. One key exemption relates to business- |

| | | |
|--|--|---|
| | | to-business marketing. When sending emails to corporate email addresses we will rely on legitimate interests (rather than consent) as the lawful basis for sending communications |
|--|--|---|

3.1 Many of the services offered by Jupiter require us to obtain Personal Data about you in order to perform the services we have been engaged to provide. In relation to each of the services described at section 2.1 above, we will collect and process the following Personal Data about you:

Information that you provide to Jupiter.

This includes information about you that you provide to us. The nature of the services you are requesting will determine the kind of Personal Data we might ask for, though such information may include (by way of a non-exhaustive list):

- basic Personal Data (such as first name; family name; job title; company name; company email address; business phone number; business address; city; postcode; country).

Information that we collect or generate about you.

This includes (by way of non-exhaustive list):

- a file with your client records and contact history to be used for enquiry purposes so that we may ensure that you are satisfied with the services which we have provided to you; and
- details of site and marketing/communication preferences.

Information we obtain from other sources.

This includes:

Cookies

- When you visit Jupiter Websites, cookies are used to collect information about the services that you use, and how you use them. Cookies are essentially a small amount of data which is transferred to and sometimes updated on your computer or other devices by our web servers.
- For more information on the cookies used by Jupiter please see our Cookie Policy on our website.

Analytics

- We may obtain publicly available data from social media as part of our use of analytics tools provided by social media sites, including Twitter. We do not deliberately identify individuals in these data sets (although they may contain some Personal Data) and do not combine it with other data. We do not share this data with any third parties.

Anonymised data

- In addition to the categories of Personal Data described above, Jupiter will also process further anonymized information and data that is not processed by reference to a specific individual.

4 How we use your information

4.1 Your Personal Data may be stored and processed by us in the following ways and for the following purposes:

- for ongoing review and improvement of the information provided on Jupiter Websites to ensure they are user friendly and to prevent any potential disruptions or cyber-attacks;
- to conduct analysis required to detect malicious data and understand how this may affect your IT system;
- for statistical monitoring and analysis of current attacks on devices and systems and for the on-going adaptation of the solutions provided to secure devices and systems against current attacks;
- for in-depth threat analysis;

- to understand your needs and interests, including to tailor the content of our marketing;
- for the management and administration of our business;
- for market analysis;
- to allow you to use and access the functionality provided by the Jupiter Products;
- to assess your application for Jupiter Products, where applicable;
- to set up customers to use Jupiter Products;
- to understand feedback on Jupiter Products and to help provide more information on the use of those products and services quickly and easily;
- to communicate with you in order to provide you with services or information about Jupiter and Jupiter Products;
- in order to comply with and in order to assess compliance with applicable laws, rules and regulations, and internal policies and procedures; or
- for the administration and maintenance of databases storing Personal Data.

4.2 However we use Personal Data we make sure that the usage complies with law and the law allows us and requires us to use Personal Data for a variety of reasons, including but not limited to the following:

- in order to perform our contractual obligations;
- where we have obtained your consent;
- where we have legal and regulatory obligations that we have to discharge;
- where we may need to do so in order to establish, exercise or defend our legal rights or for the purpose of legal proceedings;
- the use of your Personal Data as described is necessary for our legitimate business interests, such as:
 - allowing us to effectively and efficiently manage and administer the operation of our business;
 - analysing market events;
 - marketing our products and services;
 - maintaining compliance with internal policies and procedures;
 - monitoring the use of our copyrighted materials;
 - enabling quick and easy access to information on Jupiter Products;
 - offering optimal, up-to-date security solutions for mobile devices and IT systems; and
 - obtaining further knowledge of current threats to network security in order to update our security solutions and provide these to the market.

4.3 We will take steps to ensure that the Personal Data is accessed only by employees of Jupiter that have a need to do so for the purposes described in this Privacy Notice.

5 Disclosure of your information to third parties

5.1 We may share your Personal Data within the Jupiter Group for the purposes described above. This will include our subsidiaries and affiliated companies.

5.2 We may also share your Personal Data outside of the Jupiter Group for the following purposes:

- with other trusted businesses or persons for the purpose of processing personal data on our behalf for the above stated purposes. These will include any depository, stock exchange, clearing or settlement system, counterparties, dealers, custodians and others where disclosure of your Personal Data is

reasonably intended for the purpose of effecting, managing or reporting transactions or establishing a relationship with a view to such transactions;

- with our business partners. For example, this could include our partners from whom you or your company or your organisation purchased the Jupiter product(s). Personal Data will only be transferred to a business partner who is contractually obliged to comply with appropriate data protection obligations and the relevant privacy and confidentiality legislation;
- with third-party agents and contractors for the purposes of providing services to us (for example, Jupiter's accountants, professional advisors, IT and communications providers, credit reference agencies and debt collectors). These third parties will be subject to appropriate data protection obligations and they will only use your Personal Data as described in this Privacy Notice;
- with representatives, agents, custodians, intermediaries and/or other third party product providers appointed by the Client or prospective Client (such as accountants, professional advisors, custody service providers and product providers);
- 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 (including, without limitation, in order to comply with tax reporting requirements and disclosures to regulators), or to establish, exercise or defend its legal rights;
- if we sell our business or assets, in which case we may need to disclose your Personal Data to the prospective buyer for due diligence purposes; and
- if we are acquired by a third-party, in which case the Personal Data held by us about you will be disclosed to the third-party buyer.
- where you are a joint account or portfolio holder (or otherwise one of multiple persons holding an account or portfolio), we may disclose your Personal Data to the other joint account or portfolio holder or other person.

6 International transfers of personal data

6.1 Jupiter is a global business. Our customers and our operations are spread around the world. As a result we collect and transfer Personal Data on a global basis. That means that we may transfer your Personal Data to locations outside of your country.

6.2 Where we transfer your Personal Data to another country, we will ensure that it is protected and transferred in a manner consistent with legal requirements. In relation to data being transferred outside of the UK or Europe, for example, this may be done in one of the following ways:

- the country that we send the data to might be approved as offering an adequate level of protection for Personal Data;
- the recipient might have signed up to a contract based on the ICO's international data transfer agreement or addendum, or the European Commission's standard contractual clauses obliging them to protect your Personal Data; or
- in other circumstances the law may permit us to otherwise transfer your Personal Data outside the UK or Europe.

6.3 You can obtain more details of the countries we transfer data to and of the protection given to your Personal Data referred to above (including a copy of the standard data protection clauses which we have entered into with recipients of your Personal Data) by contacting us as described in section 10 below.

7 How we safeguard your information

7.1 We have extensive controls in place to maintain the security of our information and information systems. Appropriate controls (such as restricted access) are placed on our computer systems. Physical access to areas where Personal Data is gathered, processed or stored is limited to authorised employees.

7.2 As a condition of employment, Jupiter employees are required to follow all applicable laws and regulations, including in relation to data protection law. Unauthorised use or disclosure of confidential client information by a Jupiter employee is prohibited and may result in disciplinary measures.

8 **How long we keep your personal data**

8.1 How long we will hold your Personal Data for will vary and will be determined by the following criteria:

- the purpose for which we are using it - Jupiter 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.

9 **Your rights**

9.1 In all the above cases in which we collect, use or store your Personal Data, you may have the following rights and, in most cases, you can exercise them free of charge. 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 the 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 for doing so. For example, we may need to retain Personal Data to comply with a legal obligation;
- 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 directly to Jupiter;
- 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, or 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 refuse that request; and
- the right to lodge a complaint with the relevant data protection regulator if you think that any of your rights have been infringed by us.

9.2 You can exercise your rights by contacting us using the details listed in section 10 below.

10 **Questions and concerns**

10.1 If you have any questions or concerns about Jupiter's handling of your Personal Data, or about this notice, please contact The Data Protection Officer using the following contact information:

Address: The Data Protection Office, The Zig Zag Building, 70 Victoria Street, London, SW1E 6SQ

Email Address: DPO@jupiteram.com

We are usually able to resolve privacy questions or concerns promptly and effectively. If you are not satisfied with the response you receive, you may escalate concerns to the applicable privacy regulator in your jurisdiction. Upon request, we will provide you with the contact information for that regulator.