

PRIVACY NOTICE

About This Notice

Delfin Private Office International Limited (Delfin) is committed to protecting your personal and sensitive information. This notice applies to any personal data you supply to us when you engage us to provide our services (either as a representative of a named client or as an individual named client) to you or when you browse our website, and explains:

- why and how we retain and process your personal data;
- what rights you have; and
- what our obligations are.

We take our responsibility very seriously and maintain stringent data protection security standards.

'Personal data' is defined as any information that relates to an identified or identifiable natural person (rather than to a legal entity, such as a company).

Controller

Delfin Private Office International Limited is the data controller and responsible for your personal data (collectively referred to as "Delfin", "we", "us" or "our" in this privacy policy).

If you have any questions about this policy or about how we handle your data, please contact our data privacy team as follows:

Email: info@delfinprivateoffice.com

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK regulator for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

How is your personal data collected?

We use different methods to collect data from and about you including through:

Direct interactions. You may give us your personal data by filling in forms or by corresponding with us by post, phone (including via Teams), email or otherwise. This includes personal data you provide when you:

- apply for our services;
- create an account on our website;
- subscribe to our publications; or
- give us feedback or contact us.

Automated technologies or interactions. As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies.

Third parties. We will receive personal data about you from various third parties such as:

- analytics providers such as Google

- providers of technical, payment and delivery services
- parties that make a referral to us

What types of personal data do we collect?

Delfin will, depending on the relationship we have with you, collect and process personal data about you. This data can include:

- personal details such as your name, identification number, date of birth, know your client (KYC) documents (including a copy of your passport or national identity card), phone number, physical and electronic address, and family details such as the name of your spouse, partner, or children;
- financial information, including information relating to your assets (including fixed properties), financial statements, liabilities, taxes, revenues, earnings and investments (including your investment objectives);
- tax domicile and other tax-related documents and information;
- where applicable, professional information about you, such as your job title and work experience;
- information contained in meetings and calls that may be held via communications platforms such as Teams and transcribed;
- your knowledge of and experience in investment matters;
- details of our interactions with you and the products and services you use;
- where we have your email address stored in our Customer Relationship Management (CRM) software, we track and store email communications between you and Delfin;
- where applicable, Power of Attorney details;
- identifiers we assign to you, such as your client codename;
- information you provide when filling in forms on our website;
- technical information including includes your computer's Internet Protocol (IP) address, your browser type and version, the pages you visit, the time and date of your visit, the time spent on each page, the device type, operating system, unique device identifiers, device settings, and geo-location data;
- in some cases (where permitted by law), special categories of personal data, such as your health information, and, to the extent legally possible, information relating to criminal convictions or offences;
- in some cases, we collect information from public registers (which, depending on the product or service you receive, may include beneficial ownership and other registers), public administration or other third-party sources, such as wealth screening services, credit reference agencies and fraud prevention agencies;
- if relevant to the services we provide to you, we will also collect information about additional third parties related to you including, business partners (including other shareholders or
- beneficial owners), dependants or family members, representatives, and agents. Before providing Delfin with this information, you should provide a copy of this notice to those individuals.

Under which lawful basis and for which purposes do we process personal data?

Delfin's lawful basis for processing

Depending on the purpose of the processing activity (see section 4.2), we will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you [*].
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests [**].
- Where we need to comply with a legal obligation [***].
- In limited circumstances where you have given your consent [****].

Purposes of processing

We always process your personal data for a specific purpose and only process the personal data which is relevant to achieve that purpose. We have indicated by asterisks against the purpose or purposes for which we are processing below, which lawful basis we rely on. Where a legitimate interest is involved, we state what the legitimate interest is.

- our client take-on processes, including to verify your identity, and to conduct legal and other regulatory compliance checks (for example, to comply with anti-money laundering regulations, and prevent fraud);[*] and [***]
- providing our services to you or to your organisation; [*]
- managing our relationship with you, including communicating with you in relation to the services you obtain from us and from our business partners, handling customer service-related queries and complaints;[*] and [**]
- helping us to learn more about you as a customer, the services you receive, and other services you may be interested in receiving, for instance by looking at the types of products and services that you use from us, how you like to be contacted and making suggestions and recommendations to you about services that may be of interest to you;[**]
- taking steps to improve our services and our use of technology, including testing and upgrading of systems and processes, and conducting market research to understand how to improve of our existing services or learn about other services we can provide; [**]
- meeting our on-going regulatory and compliance obligations (e.g. laws of the financial sector, anti- money-laundering and tax laws), including in relation to recording and monitoring communications, disclosures to tax authorities, financial service regulators and other regulatory and governmental bodies, and investigating or preventing crime; [***]
- ensuring the safety of our customers, employees and other stakeholders; [***]
- undertaking transactional and statistical analysis, and related research; [**]
- for the business' prudent operational management (risk management, insurance, audit, systems and products training and similar administrative purposes); [***]

- to administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data) ; [***]
- We will normally only process special category data where the processing is necessary for the purposes of providing our clients with advice, with their consent. From time to time we may need to use or share information in support of our own regulatory obligations, or to prevent or detect unlawful acts; [***] and [****]
- any other purposes we notify to you from time to time.

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

Who has access to personal data and with whom are they shared?

External Third Parties

- Service providers acting as processors who provide services such IT service and hosting companies, compliance advisor, communication services, providers of audio processing software, PEP and sanctions checks and credit reference agencies.
- any third-party fund manager who provides asset management services to you; and
- any introducing broker or intermediary (e.g. Lawyer, Accountant, Tax Adviser) to whom we provide introductions or referrals.
- Professional advisers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities based in the United Kingdom, public authorities, regulators or governmental bodies, including when required by law or regulation, under a code of practice or conduct, or when these authorities or bodies require us to do so.
- Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.
- We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

International transfers of personal data

Many of our external third parties are based outside the UK so their processing of your personal data will involve a transfer of data outside the UK.

Whenever we transfer your personal data out of the UK, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data; or

Where we use certain service providers, we may use specific contracts approved for use in the UK which give personal data the same protection it has in the UK.

If you require further information please contact us.

Security Note

We have put in place appropriate technical and organisational measures to prevent unauthorised or unlawful access to the personal data you have provided to us. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

As complete data security cannot be guaranteed for communication via e-mails, instant messaging, and similar means of communication, we recommend sending any particularly confidential information by an alternative secure means and using appropriate passwords when using unsecure mediums of communication, further information on this point can be found [insert where],

How long do we store your data?

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

Details of retention periods for different aspects of your personal data are available from us by contacting us.

Your rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Please see below (Your Legal Rights) to find out more about these rights.

If you wish to exercise any of these rights please contact our data privacy team.

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded,

repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

YOUR LEGAL RIGHTS

You have the right to:

- Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:
 - If you want us to establish the data's accuracy.
 - Where our use of the data is unlawful but you do not want us to erase it.
 - Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.
 - You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly

used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

- Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain services to you. We will advise you if this is the case at the time you withdraw your consent.

Concerns or complaints

If you are concerned about us any aspect of our conduct regarding your privacy, you can make a complaint. We will act upon it promptly. To make a complaint, please e-mail us at info@thornbridge.com. We will respond and address, without delay, any request, question, complaint or enquiry you have about your personal information or our conduct in processing it. If you are not satisfied with the way we handled your response, or you believe we have not adequately resolved a matter, you have the right to complain to the Information Commissioner's Officer (the 'ICO'). You can find further details on the ICO website at <https://ico.org.uk/>

You also have the right, at any time, to complain to the Information Commissioner's Office. As an independent UK authority, the ICO upholds information rights in the public interest, promotes openness by public bodies and data privacy for individuals.

Thornbridge Investment Management LLP is registered with the Information Commissioner's Office, registration number ZA178531. We can be contacted at

Thornbridge Investment Management LLP
13 Austin Friars
London
EC2N 2HE

Status of this privacy notice

This privacy notice was updated in July 2026. It is a notice explaining what Delfin does, rather than a document that binds Delfin or any other party contractually. We reserve the right to amend it from time to time.