

Origin Online Privacy Policy (the “Policy”)

This Policy is issued on behalf of Origin Asset Management LLP (“Origin”, “we”, “us”, “our”). It is applicable to individuals accessing our digital technologies from the European Economic Area.

Your personal information is important to us. That’s why we do so much to protect your information. While no one can guarantee absolute information security, we protect your information in many ways for example ensuring that our buildings are secure, preparing for disasters and business interruptions and using safe and secure computing practices. We continually review and make enhancements to how we safeguard and protect client information.

About this website. This Policy will inform you as to how we look after your personal information when you visit our website (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you. This Policy applies to this website, our online registration form and analytics that link to this Policy (together, “Digital Technologies”). This Policy does not apply to any information collected through other channels, such as in person, on paper, or by phone.

Other sites. Digital Technologies operated by non-Origin related entities may link to and from our website, but they may have different privacy policies from the one described here. We do not have control over, or responsibility for, the content or operation of the website of any non-Origin entity. These other sites may send their own cookies to your device, may independently collect data or solicit personal data or personally identifiable information, and may or may not have their own published privacy policies. Visitors should read the privacy statements of other websites they visit for information regarding their specific privacy practices.

Your consent. Please review this Policy before using our Digital Technologies. To the extent permissible under European Union General Data Protection Regulation (2016/679), by using our Digital Technologies you are consenting to the collection, use and disclosure of your information as set forth in this Policy. If you do not agree to be bound by this Policy, you may not access or use all of our Digital Technologies.

Information collected. Origin collects personal data about you, i.e. information that can be used to identify you as an individual. Types of personal information we collect and use when you provide such information through our Digital Technologies include name, both email and physical address, contact details, your profession, information we obtain through emails, conversations, social media interactions, or any other correspondence between us and details about you that are available in public records or that is openly available on the internet. We will only use your personal information when the law allows us to. We will use your personal information where it is necessary for our legitimate interests, where we need to comply with a legal or regulatory obligation and where you provide consent. The personally identifiable information collected varies depending upon the function selected and the information provided. For individuals that login as representatives of a business or corporate account, we may gather information based on your relationship with our organization for the purposes of providing customized online services. For visitors who provide an email address or volunteer other information, such as contact information and/or site registration, we collect this information. Additionally, visitors may receive periodic messages from us about new products and services or upcoming events. If you do not want to receive e-mail or other mail from us, please email us at info@originam.com.

How and why we use information collected through Digital Technologies. We will only use your personal information where relevant and when the law allows us to. Most commonly, we may use your personal information in the following circumstances:

- Where it is necessary for our legitimate interests (i.e. we have a business or commercial reason for using your information) and your interests and your fundamental rights do not override those interests such as;
 - Being efficient about how we fulfill our legal and contractual duties.
 - Providing high quality client service.
 - Complying with regulations that apply to us.

- Developing services, and what we charge for them.
- Defining types of clients for new services.
- Seeking your consent when we need it to contact you.
- Developing and improving the network security, efficiency and technical specification of our IT systems and infrastructure.
- Developing and improving how we deal with and manage financial crime.
- Providing our clients with high quality services and Digital Technologies features.
- Keeping our services and Digital Technologies features updated and relevant.
- Where we need to comply with a legal or regulatory obligation (“Legal obligation”); or
- Where you consent.

We may use your personal information for the following reasons:

- To provide and manage our services and Digital Technologies (including any online account with us).
- To communicate with you and respond to your enquiries, including responding to complaints and attempting to resolve them.
- To send you promotional and marketing materials, newsletters or other related communications.
- To conduct research and analysis to improve the quality of our marketing and the experience of and relationships with our clients.
- To comply with our legal and regulatory obligations and to exercise our legal rights.
- To administer and protect our business and our Digital Technologies (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data).
- To develop, manage and improve our services and the Digital Technologies (including conducting research and analysis) and to test new services, and features of the Digital Technologies.
- To run our business in an efficient and proper way, including in respect of our business capability, corporate governance, audit, strategic planning and communications.

Failure to provide personal information. Where we need to collect 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 perform the contract we have or are trying to enter into with you (for example, to provide you with services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

Change of purpose. We will only use your personal information for the uses and purposes set out above, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original uses and purposes. If we need to use your personal information for an unrelated purpose, we will notify you and will explain the legal basis which allows us to do so.

Information shared. Except with your consent as described above, we will not provide any of your personal information to any other third parties not listed below without your specific consent. Information collected may be shared with our staff, partners, affiliates, attorneys, third party service providers and where applicable accountants and auditors and as otherwise required or permitted by law.

How we protect your information. We understand the importance of appropriately safeguarding information you provide to us. It is our practice to protect the confidentiality of this information, limit access to this information to those with a business need, and not disclose this information unless required or permitted by law.

We have security practices and procedures in place to protect data entrusted to us. These procedures and related standards include limiting access to data and regularly testing and auditing our security practices and technologies.

All employees are required to complete privacy, security, ethics and compliance training. We also offer a wide variety of other training to all employees and temporary workers to help us achieve our goal of protecting your information. Ultimately, no website, mobile application, database or system is completely secure or “hacker proof.” While no one can guarantee that your personal information will not be disclosed, misused or lost by accident or by the unauthorized acts of others, we continuously review and make enhancements to how we protect client information. Further, we cannot control dissemination of personal information you post on or through our Digital Technologies using any social networking tools we may provide and you should have no expectation of privacy in respect of such information.

Retention of data. It may not always be possible to completely remove or delete all of your information from our databases without some residual data because of backups and other reasons. We will retain your information for as long as your information is necessary for the purposes for which it was collected. For example, we may retain your personal data if it is reasonably necessary to comply with any legal obligations, meet any regulatory requirements, resolve any disputes or litigation, or as otherwise needed to enforce this Policy and prevent fraud and abuse. If requested by a law enforcement authority, we may also be required to retain your personal data for a period of time.

Do Not Contact or Call Requests. Once you have provided your personal information to Origin, if you do not wish to be contacted by mail, telephone, email or fax, you can notify us by email info@originam.com.

Children’s privacy online. Our Digital Technologies are not directed toward children. We do not knowingly collect, use or post personally identifiable information from children under the age of 13. If we determine upon collection that a user is under this age, we will not use or maintain his or her personal information without parent or guardian consent. If we become aware that we have unknowingly collected personally identifiable information from a child under the age of 13, we will make reasonable efforts to delete such information from our records. If you want to learn more about children’s privacy under the GDPR, you can access a number of resources on the UK Information Commissioner’s website <https://ico.org.uk/>.

Your legal rights. Under certain circumstances, you have rights under EU data protection laws in relation to your personal information:

- Right to withdraw consent at any time.
- Right to request access to your personal data.
- Right to object to processing of your personal data.
- Right to request correction of your personal data.
- Right to request erasure of your personal data.
- Right to request transfer of your personal data.
- Right to request restriction of processing.
- Right to make a complaint.

You will not have to pay a fee to access your personal data (or to exercise any of your other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances. We require that your request be in writing. In addition, 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 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. We try to respond to all legitimate requests within one month. Occasionally it may 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.

Data Transfers. The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area (“EEA”). We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission. For further details, see European Commission website: “Adequacy of the protection of personal data in non-EU countries”. Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between Europe and the US. Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

Effective date and changes to this Policy. This Policy is effective as of 25 May 2018. We are continually improving and adding to the features and functionality of our website and the services we offer through our Digital Technologies. As a result of these changes (or changes in the law), we may need to update or revise this Policy. Accordingly, we reserve the right to update or modify this Policy at any time, without prior notice. To the extent permissible under applicable law, your continued use of our Digital Technologies after we have posted the revised Policy constitutes your agreement to be bound by the revised Policy. However, we will honour the terms that were in effect when we gathered data from you.

Contact us. If you have any questions about this Policy, the practices of or your dealings with our Digital Technologies, or if you would like to exercise any rights you may have in relation to your personal information, please contact:

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