

PRIVACY NOTICE

Entity recipients are requested to pass this Privacy Notice to relevant underlying individuals.

Updated with effect from 03 January 2019

This privacy notice is issued by DG Partners LLP (“**DG Partners**”) and BH-DG Systematic Trading LLP (“**BH-DG**”) together referred to as the “**DG Entities**”, “**we**”, “**us**” or “**our**” and individually each a “**DG Entity**”).

This privacy notice is addressed to our clients, customers, investors and prospective investors (including end-investors) and other recipients of our services (together, “**you**”).

We are committed to protecting your privacy.

Further information regarding the DG entities is set out in Appendix I.

I. About this privacy notice

For the purposes of data protection laws, the DG Entities are joint data controllers in respect of your personal data. The DG Entities are responsible for ensuring that they use your personal data in compliance with applicable data protection laws.

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.

II. Personal data that DG Entities collect about you

We may collect and process the following personal data about you from various sources, including:

1. Information that you may provide to us or to one of our affiliates:

This includes information about you that you give us by filling in forms or by communicating with us, whether face-to-face, by phone, e-mail or otherwise. This information may include the following:

- Personal Details: given name; preferred name; date of birth / age; social security number; passport number; other government issued numbers (including tax identification number or driving licence number); nationalities; images of passports; images of driving licences; images of signatures; other authentication data, photographs and visual images;
- Contact details: address; telephone number; fax number and email address;
- Employment details: industry; role; business activities; names of current and former employers; work address; work telephone number; work fax number and work email address;
- Education history: details of your education and qualifications; and
- Financial details: billing address; bank account details; and information regarding your financial status.

2. Information we may collect or generate about you:

This includes, in addition to the information provided to us under 1 above, the following:

- Call recordings;
- Information gathered from social media profile details;
- Details of your interaction with us; and
- Information gathered from online searches.

3. Information we obtain from other sources:

We may obtain any of the information listed in 1 and 2 above, as well as additional personal detail about you, from other sources such as:

- Administrators; and
- Third party service providers.

III. Your personal data may be stored and processed by the DG Entities in the following ways and for the following purposes:

Purposes of processing:	Indicative legal bases for processing (set out in summary format, please refer to section IV below for details of each legal basis):
<p>AML/KYC: including ‘Know Your Client’ checks for client on-boarding; confirming and verifying your identity against government, supranational bodies and/or law enforcement agency sanctions lists as well as any internal sanctions lists; and compliance with our internal compliance requirements, policies and procedures.</p>	<ul style="list-style-type: none"> - For performance of a contract. - For compliance with a legal or regulatory obligation. - For fulfilment of a legitimate interest.
<p>Product Governance: assessing your appropriateness or suitability for the provision of services or products to you or to an entity or person affiliated with you.</p>	<ul style="list-style-type: none"> - For performance of a contract. - For compliance with a legal or regulatory obligation. - For fulfilment of a legitimate interest.
<p>Provision of services: for the provision of investment management or investment advisory services in accordance with our mandate.</p>	<ul style="list-style-type: none"> - For performance of a contract. - For compliance with a legal or regulatory obligation. - For fulfilment of a legitimate interest.
<p>Relationship management: administering our relationship; and undertaking any tasks necessary for the provision of services or products.</p>	<ul style="list-style-type: none"> - For performance of a contract. - For compliance with a legal or regulatory obligation. - For fulfilment of a legitimate interest.
<p>Marketing: engaging in marketing activities via email, telephone, post or in face to face meetings.</p> <p><i>If you do not wish to receive marketing communications you may unsubscribe at any time by contacting investor.relations@bhdgsystematic.com or investor.relations@dgparkers.co.uk (as applicable).</i></p>	<ul style="list-style-type: none"> - For fulfilment of a legitimate interest. - With your prior explicit consent.
<p>Performance updates: sending you performance updates in connection with a relevant account or investment such as monthly or weekly newsletters.</p> <p><i>If you do not wish to receive performance updates you may unsubscribe at any time by contacting investor.relations@bhdgsystematic.com or investor.relations@dgparkers.co.uk (as applicable).</i></p>	<ul style="list-style-type: none"> - For performance of a contract. - For compliance with a legal or regulatory obligation. - For fulfilment of a legitimate interest.

Security: physical security of our premises (including records of visits to our premises and CCTV recordings).	- For fulfilment of a legitimate interest.
Legal compliance: compliance with our legal or regulatory obligations under applicable laws.	- For compliance with a legal or regulatory obligation.
Legal proceedings: establishing, exercising and defending legal rights.	- For compliance with a legal or regulatory obligation. - For fulfilment of a legitimate interest. - For establishing, exercising or defending our legal rights or for the purposes of legal proceedings.

IV. Grounds for using your personal data

We are entitled to use your personal data in these ways because:

1. Processing is necessary for the **performance of a contract** with a DG Entity to which you, or a person or entity affiliated with you, are a party or in order to take steps at your request prior to entering into a contract.
2. Processing is necessary for **compliance with legal and regulatory obligations** to which the DG Entities, or one of them, is subject.
3. Processing is necessary for the purposes of the **legitimate interests** pursued by the DG Entities or one or more of our affiliates or by a third party, except where such interests are overridden by your interests or fundamental rights and freedoms as a data subject.
4. Processing is necessary for the establishment, exercise or defence of our legal rights or for the purpose of legal proceedings; or
5. We have, in accordance with applicable data protection laws, obtained your explicit consent prior to processing your personal data for one or more specific purposes. ***This legal basis will be used, with your express prior consent, in circumstances where the aforementioned grounds are not available or are insufficient as a legal basis for processing.***

In all circumstances, the DG Entities will only process personal data in accordance with applicable data protection laws.

V. Arrangements between the DG Entities

Where data is shared internally between DG Entities we will take steps to ensure that personal data is accessed only by personnel that have a need to access and use such data in connection with the purposes described in this privacy notice and are subject to binding contractual obligations of confidentiality.

The DG Entities operate from the same premises, subject to confidentiality arrangements, and have implemented joint security measures as data controllers.

Personal data protection compliance responsibilities are apportioned between the DG Entities as appropriate, in particular, the responsibility for responding to any subject access requests and submission of breach notifications to the Information Commissioner's Office (the "ICO") will be fulfilled by the DG Entity with whom the data subject has entered into a contractual relationship or in the absence of a contractual relationship by the DG Entity that has the closest association with the matter.

VI. Disclosure of your information to third parties

We may also share your personal data with third parties and/or affiliates of the DG Entities:

- administrators, accountants, auditors, financial and tax advisors, lawyers and other professional advisors and service providers to the DG Entities, in connection with business purposes, subject to binding contractual obligations of confidentiality;
- distributors and placement agents, including Brevan Howard US, LLC (“BHUS”), Brevan Howard Asset Management LLP (“BHAM”), and DG Partners US, LLC (“DG Partners USA”) who provide capital introduction and placement agent services with respect to certain funds managed by DG Partners LLP (the “Funds”). Each of BHUS, BHAM and DG Partners USA acts as a joint controller with DGP and/or BH-DG in respect of personal data gathered in connection with the Funds and are subject to binding contractual obligations of confidentiality;
- other Brevan Howard group members due to their contractual rights and ownership rights in our business;
- if we sell any of our business or assets, in which case we may disclose your personal data to the prospective buyer for due diligence purposes;
- if we are acquired by a third party, in which case personal data held by us about you will be disclosed to the third-party buyer;
- to third party agents or contractors (for example, 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;
- 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 obligations, establish, exercise or defend our legal rights; and
- Governmental, legal, tax and regulatory, or similar authorities, ombudsmen, and central and/or local government agencies, upon request or where required, including for the purposes of reporting any actual or suspected breach of applicable laws or regulations.

VII. Transfers of personal data outside the European Economic Area

The DG Entities will process all personal data within the United Kingdom, however, third party processors to whom personal data is disclosed in accordance with this privacy notice may transfer your personal data, process your personal data or store your personal data at a destination outside the European Economic Area (“EEA”).

Where we transfer your personal data outside the 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 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 European Commission;
- the recipient might have signed up to a contract based on “model contractual clauses” approved by the European Commission, obliging them to protect your personal data; or
- where the recipient is located in the US, it might be a certified member of the EU-US Privacy Shield scheme.

In certain circumstances the law may permit us to otherwise transfer your personal data outside the EEA. In all cases, we will ensure that any transfer of your personal data by the DG Entities is compliant with applicable data protection laws.

VIII. Data minimisation and retention

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;
- the amount, nature, and sensitivity of the personal data and the potential risk of harm from unauthorised use or disclosure of your Personal Data; and
- legal obligations – laws or regulation may set a minimum period for which we have to keep your personal data.

On conclusion of the retention period, we will:

- delete or destroy the relevant personal data; or
- archive the relevant personal data so that it is beyond use or anonymise your personal data so that it can no longer be associated with you, in which case it is no longer Personal Data.

IX. Data security and accuracy

We have implemented appropriate technical and organisational security measures designed to protect your personal data against accidental or unlawful destruction, loss, alteration, unauthorised disclosure and unauthorised access in accordance with applicable data protection laws.

X. 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/>.

XI. Changes to this privacy notice

We reserve the right to update this privacy notice at any time, and we will make an updated copy of such privacy notice available on our website.

XII. Privacy under the Commodity Futures Trading Commission rules

DG Partners and BH-DG are members of the US National Futures Association and are registered with the US Commodity Futures Trading Commission (“CFTC”) as a commodity pool operator and commodity trading advisor, respectively. This privacy notice and the DG Entities’ policies and procedures in relation thereto satisfy DG Partners’ and BH-DG’s obligations under CFTC rule 160.

XIII. 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 (as applicable):

DG Partners LLP	BH-DG Systematic Trading LLP
Legal & Compliance Department	Legal & Compliance Department
Email: Legal@dgpartners.co.uk	Email: Notices@bhdsystematic.com
Address: 3 rd Floor, 10 Grosvenor Street London, W1K 4QB United Kingdom	Address: 3 rd Floor, 10 Grosvenor Street London, W1K 4QB United Kingdom
Telephone: +44 (0)20 7408 5200	Telephone: +44 (0)20 7408 5200

APPENDIX I

DG Entities	Addressed	Additional Information
<p>DG Partners LLP (“DG Partners”)</p>	<p>Registered office address: 4th Floor Reading Bridge House, George Street, Reading, Berkshire, RG1 8LS, United Kingdom</p> <p>Principal place of business: 3rd Floor, 10 Grosvenor Street, London, W1K 4QB, United Kingdom</p>	<p>DG Partners is a limited liability partnership registered in England and Wales with registration number OC302881.</p> <p>DG Partners is authorised and regulated by the United Kingdom Financial Conduct Authority.</p>
<p>BH-DG Systematic Trading LLP (“BH-DG”)</p>	<p>Registered office address: 4th Floor Reading Bridge House, George Street, Reading, Berkshire, RG1 8LS, United Kingdom</p> <p>Principal place of business: 3rd Floor, 10 Grosvenor Street, London, W1K 4QB, United Kingdom</p>	<p>BH-DG is a limited liability partnership registered in England and Wales with registration number OC35597.</p> <p>BH-DG is authorised and regulated by the United Kingdom Financial Conduct Authority.</p>