

WINTON CAPITAL MANAGEMENT LIMITED

Privacy Notice

2015/2016

Privacy Notice

This Privacy Notice (the “Notice”) and any applicable agreement entered into by you and Winton sets out the basis on which Winton uses your personal information. For the purposes of the United Kingdom Data Protection Act 1998 (the “Act”), the data controller is Winton Ventures of 16 Old Bailey, London, EC4M 7EG (hereafter “Winton”).

Winton is committed to protecting your personal information and respecting your privacy. Winton will use your personal information fairly and lawfully.

If you are viewing this Notice on www.wintonlabs.com (the “Site”), you accept that your use of the Site indicates your consent to the practices described in this Notice.

Whose Personal Information Is Collected?

Winton collects and uses information about the following groups of individuals:

- Clients, investors and beneficiaries (current, prospective and former) and any of their directors, officers, employees, partners, shareholders or agents;
- Suppliers and service providers;
- Professional advisers and consultants;
- Individuals who contact Winton by email, phone or otherwise and any visitors to the Site; and
- Employees, contractors and other members of staff (current, prospective and former).

Types of Personal Information

Winton may collect and use personal information that is:

- Directly provided by you;
- Related to services provided to you by Winton;
- Received from your representatives or advisers;
- Received from third parties, including administrators of products advised by Winton; or
- Collected using cookies and other technologies when visiting the Site.

The Site uses cookies to distinguish you from other Site users and help ensure that the Site is operating smoothly. Please see Winton’s Cookie Policy on the Site for more information.

Purposes for Collecting Personal Information

Winton may use the information held about you to:

- Provide you with information about Winton’s products, services, research or events;
- Assess your suitability for products or services;
- Fulfil any contract between you and Winton;
- Fulfil any legal, regulatory or self-regulatory requirement that applies to Winton and/or any member of the Winton group of companies;
- Ensure that the Site is effectively presented for you and for your computer or device;
- Administer the Site; and
- Respond to any enquiry or complaint raised by you.

Winton may also combine any information that you provide with the information received from other sources. This combined information may be used for the purposes set out above.

Third Parties

Winton may share your personal information with any member of the Winton group of companies for the purposes set out above.

Winton may share your personal information with selected third parties including:

- Business partners, suppliers and sub-contractors for the performance of any contract Winton enters into with them or you;
- Analytics providers that assist in the improvement of the Site.

Winton may also share your personal information with third parties in the following circumstances:

- If Winton sells or buys any business or assets, it may be necessary to share your personal information with the prospective seller or buyer;
- If Winton is acquired by a third party, the personal information held by Winton will be one of the transferred assets; or
- If there is a duty to share your personal information in order to fulfil any legal, regulatory or self-regulatory requirement that applies to Winton and/or any member of the Winton group of companies.

The Security of Your Information

All information you provide to Winton is stored on secure servers. Access to your personal information by Winton staff is limited in accordance with Winton's information security policies and procedures.

Where Winton Stores Your Personal Information

The information that Winton collects from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). It may also be processed by Winton or Winton's suppliers operating outside of the EEA for the purposes set out above. By submitting your personal information to Winton, you agree to this transfer, storing or processing. Winton will take all steps reasonably necessary to ensure that your personal information is treated securely and in accordance with the Notice.

Your Rights

The Act gives you the right to access information held about you and to request that such information is not used for any particular purpose (for example to provide you with information about Winton's products, services, research or events). You can exercise these rights by writing to;

The Data Protection Officer
Winton Capital Management
27 Hammersmith Grove
London
W6 0NE

Any access request will be subject to a small fee of £10 to meet Winton's costs in providing you with details of the information Winton holds about you.

Changes to This Notice

Any changes Winton may make to this Notice will be posted on the Site. Please check back frequently to see any updates or changes to this Notice.