

# PRIVACY NOTICE

## AKO CAPITAL LLP

### INTRODUCTION

At AKO Capital LLP we respect your privacy and we recognize that you have certain rights in regards to your personal information. These include the right to know the types of personal information we collect about you; how we might use it; how we endeavour to ensure that it remains safe from unauthorized disclosure; and your rights with respect to such personal data. This privacy notice has been designed to answer these questions.

### ABOUT THIS PRIVACY NOTICE

AKO Capital LLP (“AKO”, “we”, “us” and “our”) is incorporated in England and Wales and its registered office is 1 Newman Street, London, W1T 1PB. AKO is authorised and regulated in the U.K. by the Financial Conduct Authority; its company number is OC312612.

We are a data controller in respect of your personal data for the purposes of data protection law, such as the European Union’s General Data Protection Regulation (the “EU GDPR”), the EU GDPR as incorporated into domestic law in the UK by virtue of the European Union (Withdrawal) Act 2018 (the “UK GDPR”) and the UK Data Protection Act 2018. We are responsible for ensuring that we use your personal data in compliance with data protection law.

This privacy notice applies to you if (i) you are a client or prospective client of AKO (including an investor or prospective investor in a vehicle or entity that we manage or advise (“AKO Funds”)), or a service provider to us or to an AKO Fund, (ii) your personal data has been provided to us in connection with any of the foregoing by another person (such as where you are a director, partner, trustee, employee, agent or direct or indirect owner of such person); or (iii) you otherwise enter into communications with us by email or other means.

This privacy notice sets out the basis on which personal data about you that you provide to us; that we create about you; 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.

### PERSONAL DATA THAT WE COLLECT ABOUT YOU

Many of the services offered by AKO require us to obtain personal data about you in order to perform the services we have been engaged to provide.

We might process the following personal data about you:

- (a) **Information provided to AKO or to an AKO Fund or its administrator by you or (if different) the applicant for interests in an AKO Fund:** This might include your name and address (including proofs of name and address), contact details, date of birth, gender, nationality, photograph, signature, copies of identity documents, occupational history, job title, income, assets, other financial information, bank details, investment history, tax residency and tax identification information. Such information might be provided in an application form or in other documents (as part of an application process or at other times), face-to-face, by telephone, by email or otherwise.
- (b) **Information that AKO collects or generates about you:** This might include information relating to your (or an applicant’s) investment in an AKO Fund, emails (and related data), call

recordings and website usage data.

- (c) **Information that AKO obtains from other sources:** This might include information obtained for the purpose of our know-your-client procedures (which include anti-money laundering procedures, counter-terrorist financing procedures, politically-exposed-person checks and sanctions checks, among other things), information from government or public bodies, public websites and other public sources and information received from the applicant's advisers or from intermediaries.

## **USES OF YOUR PERSONAL DATA**

We collect your personal information to fulfil our contractual obligations, our statutory and regulatory obligations and/or the legitimate interests of AKO or an AKO Fund and for other purposes for which AKO has a lawful basis under the privacy laws, including:

- (a) Compliance with legal and regulatory obligations and industry standards, including know-your-client procedures, the automatic exchange of tax information and legal judgments.
- (b) General business administration, including communicating with investors, communicating with service providers and counterparties, accountancy and audit services, risk monitoring, the administration of IT systems and monitoring and improving products.
- (c) Assessing and processing applications for interests in an AKO Fund and other dealings with AKO, including performing know-your-client procedures, issuing and redeeming interests, receiving payments from and making payments to the applicant, calculating net asset value, and overseeing these processes.
- (d) Business activities, such as investor relations, discussions with our or an AKO Fund's service providers and counterparties, decision-making in relation to the AKO Funds, and business strategy, development and marketing.

We are entitled to process your personal data in these ways for the following reasons:

- (a) You may enter into an investment contract with an AKO Fund and some processing will be necessary for the performance of that contract, or will be done at your request prior to entering into that contract.
- (b) Processing may be necessary to discharge a relevant legal or regulatory obligation.
- (c) The processing is necessary for the legitimate business interests of AKO or an AKO Fund or its administrator or another person, such as:
  - (i) carrying out the ordinary or reasonable business activities of AKO, an AKO Fund or its administrator or other persons, or other activities previously disclosed to you or referred to in this privacy notice;
  - (ii) ensuring compliance with all legal and regulatory obligations and industry standards, and preventing fraud;
  - (iii) establishing, exercising or defending legal rights or for other purposes relating to legal proceedings; and
  - (iv) ensuring the security of information systems.
- (d) In respect of any processing of sensitive personal data falling within special categories, such as any personal data relating to the political opinions of a politically exposed person, the processing will be necessary for reasons of substantial public interest.

## **DISCLOSURE OF YOUR PERSONAL DATA TO THIRD PARTIES**

We may from time to time, in accordance with the purposes described above, disclose your personal data to other parties, including (a) an AKO Fund's administrator and its affiliates, (b) professional advisers such as law firms and accountancy firms, (c) other service providers of AKO or an AKO Fund or its administrator, including technology service providers, (d) counterparties and (e) courts and regulatory, tax and governmental authorities. Some of these persons will process your personal data in accordance with our instructions and others will themselves be responsible for their use of your personal data. These persons may be permitted to further disclose the personal data to other parties.

## **TRANSFERS OF YOUR PERSONAL DATA OUTSIDE THE UK OR THE EUROPEAN ECONOMIC AREA**

Your personal data may be transferred to and stored by persons outside of the UK or the European Economic Area (the "EEA") such as an AKO Fund. In particular, it may be transferred to and stored by affiliates or service providers of the AKO Funds or their administrator outside the UK or the EEA.

Where personal data is transferred outside the UK or 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 UK. . This can be done in a number of different ways, for instance:

- a) the country to which the personal data is transferred may be approved by the UK government as offering a sufficient level of protection;
- b) the recipient may have agreed to "model contractual clauses" approved by the UK government that oblige them to protect the personal data; or
- c) the recipient outside of the UK and EEA has entered into binding corporate rules as permitted by applicable law or regulation

In other circumstances the law may permit us to otherwise transfer your personal data outside the UK and EEA. In all cases, however, we will ensure that any transfer of your personal data is compliant with data protection law.

You can obtain more details of the protection given to your personal data when it is transferred outside the UK and the EEA, including a copy of any standard data protection clauses entered into with recipients of your personal data, by contacting us using the details set out under "Contacting Us" below.

## **NECESSITY OF PERSONAL DATA FOR US TO PROVIDE SERVICES TO YOU OR AN INVESTMENT IN AN AKO FUND**

The provision of certain personal data is necessary for us to provide services to you or for interests in an AKO Fund to be issued to any applicant and for compliance by AKO and the AKO Funds and our and their respective service providers with certain legal and regulatory obligations. Accordingly, if certain personal data is not provided when requested, we may not be able to provide services to you and/or an application for interests might not be accepted or interests might be compulsorily redeemed.

## **HOW WE SAFEGUARD YOUR INFORMATION**

We have extensive controls in place to maintain the security of our information and information

systems. Client files are protected with safeguards according to the sensitivity of the relevant information. 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.

As a condition of employment, AKO employees are required to follow all applicable laws and regulations, including in relation to data protection law. Access to sensitive personal data is limited to those employees who need access to it to perform their roles. Unauthorised use or disclosure of confidential client information by an AKO employee is prohibited and may result in disciplinary measures.

When you contact an AKO employee about your file, you may be asked for some personal data. This type of safeguard is designed to ensure that only you, or someone authorised by you, has access to your file.

### **RETENTION OF PERSONAL DATA**

How long we hold your personal data for will vary. The retention period will be determined by various criteria, including the purposes for which we are using it (as it will need to be kept for as long as is necessary for any of those purposes) and legal obligations (as laws or regulations may set a minimum period for which we have to keep your personal data).

### **USE OF COOKIES**

When you visit our website cookies may be downloaded to your device. Cookies are small text files that allow you to access the site and ensure you have the best experience while you are on it, including enabling you to access information available exclusively on the secure portion of the site.

Cookies do not allow us to access your computer or collect personal information about you other than information that you either provide voluntarily or is automatically provided by your web browser.

If you are interested in learning more about cookies, you can find additional information at [www.allaboutcookies.org](http://www.allaboutcookies.org).

### **YOUR RIGHTS**

You have a number of legal rights in relation to the personal data that we hold about you. These rights include the following:

- (a) The right to obtain information regarding the processing of your personal data and to access to the personal data that we hold about you.
- (b) In some circumstances, the right to receive some personal data in a structured, commonly used and machine-readable format and the right to request that we transmit that 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.
- (c) The right to request that we rectify your personal data if it is inaccurate or incomplete.
- (d) 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.

- (e) 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, the processing of your personal data but we are legally entitled to continue processing your personal data or to refuse that request.
- (f) 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 under “Contacting Us” below. You can find out more information about your rights by contacting an EU data regulator such as the UK’s Information Commissioner’s Office, or by searching its website at [ico.org.uk](http://ico.org.uk).

## **CONTACTING US**

### **Designated Representative**

AKO’s registered office may be contacted using the following contact information:

Address: 1 Newman Street, London, W1T 1PB  
Email Address: [privacy@akocapital.com](mailto:privacy@akocapital.com)

### **Questions and Concerns**

If you have any questions or concerns about AKO’s handling of your personal data, or about this privacy notice please contact our Privacy Officer using the following contact information:

Address: 1 Newman Street, London, W1T 1PB  
Email Address: [privacy@akocapital.com](mailto:privacy@akocapital.com)

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 and requests to [privacy@akocapital.com](mailto:privacy@akocapital.com).