



WAY Fund Managers Limited

Privacy Policy

This Privacy Policy describes what happens to the personal information that you supply to WAY Fund Managers Limited (WFM). We are committed to protecting and respecting your privacy. We gather, use, and keep information in accordance with all UK Data Protection regulation and are registered with the Information Commissioners Office (ICO) as a controller and processor of personal data.

We will endeavour to keep your information accurate and up to date and not keep it for longer than is necessary.

If you have any questions about this Privacy Policy or the information we collect and use about you, please contact our Data Protection Office.

Data Protection Office
WAY Fund Managers Limited
Cedar House,
3 Cedar Park
Cobham Road
Wimborne, Dorset. BH21 7SB
Email: DPO@wayfunds.com

Telephone: 01202 854877

1: The type of personal information we collect

WAY Fund Managers collects, uses, and stores personal information you have provided to us or personal information which is necessary for us to provide the services you have requested

Personal information may include but is not limited to:

- personal details (e.g., name, date of birth, nationality, marital or civil partnership status, country of residence, dependents);
- address and contact details (e.g., physical address, telephone number, e-mail address);
- identification data (e.g., passport, National Insurance Number, or other identity card numbers), tax identification numbers and any other authentication data.
- information on spouses, partners, and other family details, or on authorised signatories and representatives;
- information about financial matters (e.g., source of funds, your bank details);
- recordings of telephone conversations that you have with us; and
- where necessary to provide certain services to you and with your consent, we may collect and occasionally process sensitive personal information which may include information about your physical or mental health.

2: How we get the personal information and why we have it.

Most of the personal information we process is provided to us directly by you or via an intermediary on your behalf, and from a variety of sources such as:

- the application forms completed for our services;
- conversations and correspondence with us, including recorded telephone lines;
- contacting us via our website.
- anti-money laundering verification services;
- agents, brokers, dealers, introducers, and other intermediaries;

We use the information that you have given us for:

- The management and administration of your instructions in connection with your investment.
- The registration of your share/unit holdings.
- Providing you with periodic communications with regards to your share/unit holdings.
- Making any payments in connection with your share/unit holdings.
- Verifying your identity for anti-money laundering purposes
- Verifying the beneficial ownership of money that you wish to invest with us.
- Responding to any enquiry or complaint you may make to us.
- For market research purposes, where we may contact you to ask for your feedback.
- Maintaining compliance with our internal policies and procedures; or
- For our own administrative and legal purposes, including training our staff and conducting internal audits.

3: Who do we share this information with?

There are circumstances where we may wish to share or are compelled to share your personal information to third parties.

We may pass your personal information to government institutions, regulators, authorities, and courts (when legally obliged to do so) such as the Financial Conduct Authority (FCA), the ICO or HM Revenue & Customs (HMRC). In such circumstances, we would be processing your personal data only in order to meet a legal, compliance or other regulatory obligation to which we are subject.

In the course of dealing with you, we will pass your personal information on to our contracted service providers who are processing your personal information on behalf of WFM, only for the purpose for which it was collected. This would include WFM's Transfer Agent and Registrar, who are contracted to WAY Fund Managers.

We will also share this data with

- an electronic identity checking service, which we use to complete the requirements of the anti-money laundering obligations and to verify changes of name and address for your protection.
- a mailing service that we use to carry out the bulk mailing of correspondence, such as statements and unit/share holder letters.
- Any other service providers who are processing your personal information on behalf us under contractual obligations of confidentiality, such as IT service providers, auditors, our legal advisers for the purpose of seeking its own advice, printing services, professional advisers, and fraud prevention organisations.
- Our holding company or any subsidiary companies.

Our contractors are obliged to keep your details securely and to use it only to carry out their contracted obligations with WAY Fund Managers. This sharing of your personal data does not entitle such third parties to send you marketing or promotional messages. Once your service needs has been satisfied, they will dispose of the details in line with both their own and WAY Fund Managers' security procedures.

By submitting an application and applying to invest in one of the funds that we manage, you consent to entering into this contract and giving us permission to perform those actions.

4: The legal basis for processing your personal information

Under the UK General Data Protection Regulation (UK GDPR), the lawful bases we rely on for processing your personal information are:

- because it is necessary in connection with the provision of our services. This includes personal information we require to fulfil a request for our products or services prior to entering into a contract with you and for the performance of that contract.
- for our legitimate interests as a business, examples of which are shown in 2 above.
- in order for us to comply with our legal & regulatory obligations such as to prevent money laundering, fraud, market abuse or other criminal activity, to comply with tax laws or to meet our regulatory reporting obligations.

5: How we store your personal information

Your information is securely stored. WAY Fund Managers takes all reasonable steps to ensure that any personal information that you provide to us is kept secure, and we have put in place measures to guard against unauthorised use of your personal information or accidental loss, destruction, or damage.

Your personal information will be retained for as long as it is necessary to carry out the purposes set out in this Privacy Notice (unless longer retention is required by law). However, we will not retain any of your personal information beyond this period and the retention of your personal information will be subject to periodic review.

6: Your data protection rights

Under data protection law, you have the:

- Right of access - you have the right to ask us for copies of your personal information.
- Right to rectification - you have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.
- Right to erasure - you have the right to ask us to erase your personal information in certain circumstances.
- Right to restriction of processing - you have the right to ask us to restrict the processing of your personal information in certain circumstances.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

You may do so at any time by contacting the Data Protection Office, using the contact details at the start of this notice.

July 2023

7: How to complain

The ICO is the UK's independent authority set up to uphold information rights in the public interest, promoting openness by public bodies and data privacy for individuals.

If you have any concerns about our use of your personal information, you can make a complaint to us using the contact details at the start of this notice. You can also complain to the ICO if you are unhappy with how we have used your personal information.

The ICO's address:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Helpline number: 0303 123 1113

ICO website: <https://www.ico.org.uk>

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