



ABERFORTH PARTNERS

Aberforth Smaller Companies Trust plc

Privacy Policy

Aberforth Smaller Companies Trust plc (the "Company", "we", "us" or "our") is committed to protecting the privacy of individuals whose data it processes ("you" or "your"). This Privacy Policy explains what we do with your personal data. It describes how we collect, use and process your personal data, and how, in doing so, we comply with our legal obligations. This Privacy Policy applies to the personal data of investors, directors, agents, service providers, website users, and other people whose personal data we may process. In addition, it outlines your data protection rights under applicable data protection laws, including the General Data Protection Regulation (Regulation 2016/679) (the "GDPR") (collectively, the "**Data Protection Laws**").

It is important to point out that we may amend this Privacy Policy from time to time. Please visit this page if you want to stay up to date, as we will post any changes here. If you are dissatisfied with any aspect of our Privacy Policy, you may have legal rights. We have described these in the document as well where relevant.

Data controller

The data controller of your personal data is Aberforth Smaller Companies Trust plc, of 14 Melville Street, Edinburgh, EH3 7NS (enquires@aberforth.co.uk).

How we collect personal data

We collect personal data in a number of ways. This will usually be collected by service providers to the Company, such as the registrar or receiving agent, for example when you become a shareholder in the Company or where you provide personal data on request from us. We may also receive personal data when you contact us or the company secretary, registrar or other service provider directly by phone, email or by other means. Personal data may also be provided to us by service providers for the purposes of marketing to investors.

The kind of personal data we collect

We describe below the types of personal data we may collect:

- We may collect personal data including your name, address, e-mail address, gender, date of birth, phone number, job title, bank account details, tax and national insurance details and identification documents, or any other information which you provide to us.
- To the extent that you access Aberforth Partners LLP's website ("**Aberforth**"), Aberforth will also collect certain data from you, as described in its Privacy Policy and Cookies Policy.

How we use personal data

We, or service providers acting on our behalf, use personal data in the following ways:

If you are a shareholder of the Company we use your personal information as set out below:

- to comply with legal and/or regulatory requirements;
- to carry out anti-money laundering and "Know Your Customer" checks in accordance with our legal and regulatory obligations;
- to store your details (and update them when necessary) on the shareholder register;
- to contact you in relation to your shareholding;
- to send you literature relating to the Company; and
- to keep records of conversations and correspondence.

If you are a prospective shareholder of the Company we use your personal information in the following ways:

- to carry out anti-money laundering and "Know Your Customer" checks in accordance with our legal and regulatory obligations; and
- to keep records of conversations and correspondence.

We may use the personal data of shareholders and prospective shareholders of the Company for such purposes if we deem this to be necessary for our legitimate interests provided these interests are not overridden by the interests or fundamental rights or freedoms of the individuals concerned. If you have concerns about this, in certain circumstances you have the right to object and can find out more about how and when to do this in this policy document.

For legal reasons: In some circumstances, we may use your personal data to help us to establish, exercise or defend legal claims.

Service provider data: We will use information about individuals at our service providers in the following ways:

- to store (and update when necessary) details, either ourselves or at another service provider, so that we can contact individuals in relation to our agreements with service providers;
- to obtain support and services from the service providers; and
- to facilitate our invoicing processes.

We may use personal data from our service providers for such purposes if we deem this to be necessary for our legitimate interests provided these interests are not overridden by the interests or fundamental rights or freedoms of the individuals concerned.

Directors' data: We will use information about our directors in the following ways:

- to comply with legal and/or regulatory requirements;
- to contact them in relation to their directorships;

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- to arrange payment of directors' salaries and reimbursement of expenses; and
- to keep records of conversations and correspondence.

We may use personal data from our directors for such purposes if we deem this to be necessary for our legitimate interests provided these interests are not overridden by the interests or fundamental rights or freedoms of the individuals concerned. We, or our service providers on our behalf, may provide personal data to our other service providers, provided that the data is used for the purposes described above.

Recipients of personal data

We may disclose your personal data to the Board of the Company and to third parties who are providing services to us, including IT service providers, printers, registrars and administrators.

We may also disclose personal data we hold to third parties (a) in the event that we sell any business or assets, in which case we may disclose personal data we hold about you to the prospective and actual buyer of such business or assets; and/or (b) if we are permitted by law to disclose your personal data to that third party or are under a legal obligation to disclose your personal data to that third party.

Data security

The Company has put in place measures to ensure the security of the personal data it collects and stores about you. It will use its reasonable endeavours to protect your personal data from unauthorised disclosure and/or access, including through the use of network and database security measures, but it cannot guarantee the security of any data it collects and stores.

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

International transfer of personal data

We generally do not transfer your personal data outside the European Economic Area (EEA). If we identify a need to share personal data with service providers for processing outside of the EEA we will take steps to ensure that the necessary safeguards to protect the personal data are in place.

Data retention

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

Your legal rights in respect of your personal data

You have the right to ask for a copy of the personal data which we, or service providers on our behalf, hold about you, subject to certain exceptions. If any of the personal data which we hold about you is incorrect or out of date, please let us know and we will correct it.

You have the right to object to the processing of your personal data where we are relying on a legitimate interest and there is something about your particular situation which makes you want to object to processing on this ground. Where we have obtained your consent to process personal data for certain activities, you may withdraw this consent at any time and we will cease to carry out that particular activity unless we consider there to be an alternative reason to justify our continuing to do so, in which case we will inform you of the reason.

In certain circumstances, you have the right to request that the (a) processing of your personal data is suspended; (b) personal data we hold about you is deleted; and/or (b) personal data you provided to us is transferred to another data controller (again, subject to certain exceptions).

Please note that if you exercise any of the rights listed above, we may no longer have the personal data (e.g. contact details, financial information, etc.) necessary to comply with our obligations to you following such request.

Contacting us

If you would like to exercise any of your rights, or learn more about your rights, please contact:

The Company Secretary
Aberforth Partners LLP
14 Melville Street
Edinburgh EH3 7NS
Telephone: 0131 220 0733
enquires@aberforth.co.uk

You also have the right to lodge a complaint with a data protection supervisory authority, including in the EU member state of your residence, your place of work or the place of the alleged infringement. The UK regulator for data protection is the Information Commissioner and its contact details are: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF; telephone: 0303 123 1113; email: casework@ico.org.uk.