ZENNOR
ASSET MANAGEMENT

ZENNOR LEGAL INFORMATION

January 2026

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Risk Warnings

Please remember that the value of investments and the income from them can fluctuate (this may partly be the result of exchange rate fluctuations) and you may not get back the full amount invested. Past performance is not a guide to the future. Where Zennor has expressed its own views and opinions, these may change.

By using this website, you confirm that you accept these terms as binding. We reserve the right to change the terms of this Disclaimer without notice, and by accessing or using the website, you agree to abide by such changes.

Data Privacy Policy

Zennor Asset Management LLP, UK company registration No. OC302614 ("Zennor"), is committed to protecting and respecting your privacy.

This Privacy Policy explains in detail the types of personal data we may collect about you when you interact with us. It also explains how we'll store and handle that data and keep it safe.

By accessing this Site, you acknowledge that you have read and agree to the practices described in this Policy.

Personal data is any information that enables us to identify you, either directly or indirectly in conjunction with any other information we hold, by reference to an identifier such as name, address, date of birth or government identification number. For the purpose of the Data Protection Act 2018 and the General Data Protection Regulation (UK GDPR), Zennor is both the data controller and a data processor:

- Data Controller; when managing data that we ourselves collect and store within our systems. For example, business customer and supplier information held within our CRM and employee information held within our HR system.
- Data Processor; when analysing data that our customers provide to us during the normal course of business.

Our Data Protection Officer (DPO) is:

Sachin Patel, COO

Email: contact@zennor-am.com

Tel: +44 20 7046 8520

The legal basis we rely on: Legitimate interest

Under Article 6 (1b) of the UK GDPR, the legal basis that Zennor employs for processing your personal data is that processing of your personal data is necessary for the performance of a contract to which you, the 'data subject' is party, or in order to take steps at your request prior to entering into such a contract.

For example, we might use your email address or telephone contact details to inform you of certain investment opportunities that we think might interest you

When do we collect your data?

- Via business cards from meetings
- Contact details given over the phone
- Incoming email requests
- Incoming information requests via our website
- When we collect information from publicly-available sources where you have provided your consent to share information or where the information is made public as a matter of law

What sort of personal data do we collect?

We use different methods to collect personal data from and about you including through:

- Personal data you give us. You may give us your personal data including name and contact details, by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you ask us about, or apply for, our products or services; subscribe to our services or publications; request marketing to be sent to you, or give us some feedback.

Personal data we collect.

As you interact with our Site, we may automatically collect technical data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. Please see our Cookie Policy below for further details.

How and why we process your data.

We want to provide you with the best possible customer experience. One way to achieve that is to get the richest picture of your business and the way you work and your requirements.

We then use this information to not only deliver a high level of customer service but also to make you aware of investment products that we deem to be appropriate for your business/clients.

The data privacy law allows this as part of our legitimate interest in understanding our customers and providing the highest levels of service.

If at any time you wish to change how we use your data, you can contact us to either unsubscribe from any future marketing communications or request us to remove your data entirely, which we are obliged to do as part of the new data privacy law in-line with our legal and regulatory responsibilities.

How and why we process your data.

We will use your personal data for the following purposes:

- To confirm your identity;
- To respond to your questions and provide related customer services;
- To detect and prevent fraud or other financial crime;
- To monitor and protect the security of our information, systems and network;
- For internal business intelligence purposes, to conduct research, product development and enhancement;
- To inform you of changes made to our Site and other services;
- To conduct marketing and commercial activities and to market relevant offers and promotions to you;
- To ensure that content from our Site is presented most effectively for you and your computer;
- To display content based on your interests;
- Enable you to search information on our Site;
- Assess your needs and interests in order to better tailor offers; and
- Improve our Site.

Of course, you are free to opt out of hearing from us by any of these channels at any time. If you would like to have all your details removed from our CRM system please email contact@zennor-am.com or call us on +44 20 7046 8520

How we protect your data

We know how much data security matters to all our customers. We will treat your data with the utmost care and take all appropriate steps to protect it.

Access to your personal data is password-protected and is stored within CRM system.

We regularly monitor our system for possible vulnerabilities and attacks.

Who do we share your personal data with?

Your personal data will be treated as being strictly confidential. We may share your personal data with the parties set out below for the purposes set out in this Policy:

- A member of our group;
- Companies that provide services to help us confirm your identity, meet our compliance and regulatory obligations, and to detect and prevent fraud or other financial crime;
- Our professional advisors such as auditors, accountants and lawyers, etc.;
- Companies that provide services to help us with our business activities, such as data storage, maintenance services, database management, web analytics and payment processing;
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this Policy.

We may also disclose your personal data as required by law, such as to comply with a subpoena, or a similar legal process, when we believe in good faith that disclosure is necessary to protect our rights, protect your safety or the safety of others, investigate fraud, or respond to a government request, and to any other third party with your prior consent to do so, unless notification is prohibited by the applicable law.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

Where personal data relating to UK or European based data subjects is shared with a third party located outside the UK or EEA, in a country that has not received an adequacy decision by the UK authorities or the European Commission, we rely on appropriate safeguards. We never share your data with third parties for their own purposes.

Where your data may be processed?

Sometimes we will need to share your data with third-parties and suppliers outside the European Economic Area (EEA), such as the United States.

Protecting your data outside the EEA

The EEA includes all EU Member countries as well as Iceland, Liechtenstein and Norway. We may transfer personal data that we collect from you to third-party data processors in countries that are outside the EEA. If we do this, we have procedures in place to ensure your data receives the same protection as if it were being processed inside the EEA, for example our contracts with third-parties stipulate the standards they must follow at all times.

How long do we hold your personal data?

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, after which time it will be destroyed securely if it is no longer needed for the lawful purposes for which it was obtained.

In some limited cases, it may be necessary to retain your personal data for longer if we need to hold it for liability claim purposes (e.g. if any complaints were to be made to an ombudsman service), and for example to hold and provide to a regulatory body.

If you consent to receive marketing from us, any information we use for this purpose will be held by us until such time as you notify us that you no longer wish to receive marketing information from us.

What are your rights with regards to your data?

Unless subject to an exemption under the UK GDPR, you may have the following rights with respect to your personal data:

- to request a copy of your personal data which Zennor holds about you;
- to request that Zennor corrects any of your personal data if it is found to be inaccurate or out of date;
- to request your personal data to be erased where it is no longer necessary for Zennor to retain such data;
- to withdraw your consent to the processing of your personal data at any time;
- to request that Zennor provides you with your personal data, and where possible, to transmit the data directly to another data controller (known as the right to data portability);
- where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing;
- to object to the processing of your personal data with regards to Direct Marketing;
- to lodge a complaint with an EU Data Protection Authority, such as the Information Commissioner's Office (ICO) in the UK.

Where we rely on our legitimate interest.

In cases where we are processing your data on the basis of legitimate interest, you can ask us to stop for reasons connected to your individual situation. We must then do so unless we believe we have a legitimate overriding reason to continue processing your personal data. For example, regulatory requirement.

Marketing

You have a right at any time to stop us from contacting you for marketing purposes or giving your information to other entities within our group. If you no longer wish to be contacted for marketing purposes, please contact us or simply click the 'unsubscribe' link in any email communication that we send you.

Checking your identity

To protect the confidentiality of your information, we will ask you to verify your identity before proceeding with any request you make under this Privacy Notice. If you have authorised a third party to submit a request on your behalf, we will ask them to prove they have your permission to act.

Automated decision making

We do not use automated decision making to segment and target product offers based on our customers' demands and needs. For further details, you may contact our Data Protection Officer whose details are provided in the 'Contact Details' section of this Policy.

Further processing

If we wish to use your personal data for a new purpose, not defined by this Policy, then we will provide you with a new notice explaining this new use prior to the commencement of the new processing and setting out the relevant purposes and processing conditions. Where and whenever necessary, we will seek your prior consent to the new processing.

Changes to this privacy policy

We will update this Policy from time to time, so please check back periodically.

The provisions contained in this Policy supersede all previous notices or policies regarding our use personal data.

Contact Details

Contacting the Regulator

If you feel that your data has not been handled correctly or you are unhappy with our response to any requests you have made to us regarding the use of your data, you have the right to lodge a complaint with the Information Commissioners Office (ICO).

You can call them on 0303 123 1113

Or visit them online at www.ico.org.uk

If you are based outside the UK, you have the right to lodge your complaint with the relevant data protection regulator in your country of residence.

Any Questions?

We hope this Privacy Notice has been helpful in setting out the way we handle your data and your rights to control it.

If you have any questions that have not been covered, please contact our Data Protection Officer who will be pleased to help you.

Email: contact@zennor-am.com

Or write to us at

Data Protection Officer

Zennor Asset Management LLP

The Gaumont, Level 2A,

204 King's Road,

SW3 5XP

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