

SCIENS GROUP DATA PROTECTION AND PRIVACY POLICY (“Policy”)

Privacy Commitment

All personal data which can identify you as an individual will be handled and processed with due care and consideration as you may expect, and in accordance with the following Laws: ; Data Protection Act 2018 (UK) and UK GDPR, General Data Protection Regulation (EU) 2016/679; the Privacy and Electronic Communications (EC Directive) Regulations 2003 and The Data Protection Law, 2017 (Cayman Islands) (Effective September 2019).

We take your privacy and information security seriously. We do not sell on your data nor share beyond what is required under law or for a valid legal reason. This Policy explains the purposes of processing your personal data, the information we may collect and the rights you have and how to exercise them.

Data Controllers and Registration Details

Sciens Capital Limited

Registration No: Z5797943 Information Commissioner’s Office,
UK 34 Bruton Street, London, W1J 6QX, UK

Sciens Group Risk Services Limited

Registration No: ZA208127 Information Commissioner’s Office,
UK 34 Bruton Street, London, W1J 6QX, UK

For Visitors from the United States

The Data Controller details above are included to meet UK and EU data protection laws. Under current US regulations, there is no requirement to designate a Data Controller, so this section does not apply to US-based users.

Sciens Group

This Policy belongs to the “Sciens Group” which contains at least the following companies Sciens Capital Limited, Sciens Group Risk Services Limited, , Sciens Investment Management LLC, Sciens CFO I Management Ltd., Sciens Offshore Management Ltd., and other such companies where this applies.

Contact Sciens Group

You may contact the Sciens Group regarding your personal data at any time using the following email address: GDPR@sciensam.com. Where you wish to complain, we would prefer if you contact us first, but you may address any complaint to the relevant authority as listed above.

Reasons for Processing Personal Data

The business of the Sciens Group is investment management and all the personal data we process is in accordance with our legal and contractual obligations necessary for the Sciens Group business. We also use information gathered from <https://www.scienswater.com> (the “website”) to administer, diagnose, improve our services and to correspond with you. All information gathered may be used for our own internal business purposes such as business development and promotion, as well as to protect our business from; financial crime, cyber threats, breaches of confidentiality and theft of our proprietary information.

Personal information received outside of our usual business activities (including CVs, business plans and service provider enquiries) is provided on a voluntary basis and this information is processed purely in that relevant context. Where we rely on consent for marketing and promotional communications, such consent is voluntary and can be withdrawn at any time.

Information that is Gathered

Sciens Group collects your IP address, browser type and activity such as, time accessed, and time spent. This data may be used to determine aggregated demographic and geographic information. Much of this data is gathered through cookies, a small text file stored on your computer or device that accessed the website.

Personal information is also gathered through the usual course of a relationship or enquiry; from emails, telephone calls and other forms of correspondence, as well as from legal documentation such as application forms. Your personal information may also come to us from third parties such as fund administrators, as part of the course of Sciens Group's business activities.

What We Do with Personal Data

All personal data is treated as confidential and stored securely in accordance with appropriate technical and organisational measures. . We also have a data retention policy which is to ensure all personal information is deleted or individuals can no longer be identified after its purpose or legal requirement to maintain it has passed.

Personal data is also shared within the Sciens Group under the purposes it is required to be processed. Data is shared with our contractual third-party administrators, suppliers and custodians as necessary for the performance of our business, and is subject to appropriate contractual safeguards. Personal data may also be shared with the relevant competent authorities for the following purposes: tax information exchange, regulatory, anti-money laundering and countering terrorist financing, legal proceedings, and any required legal disclosure.

International Transfer of Personal Data

Data which is required to be shared and is transferred outside of the EU or a GDPR equivalent jurisdiction are safeguarded to ensure the standards of data protection are maintained. The Sciens Group has harmonised policies and procedures with respect to data protection. Appropriate safeguards in contractual arrangements are in place between third parties outside of a GDPR equivalent jurisdictions and we confirm our administrators have similar contractual arrangements in place. Sciens Group will, unless otherwise restricted, allow personal information to be shared to fulfil our legal and contractual obligations.

Access to your Personal Information and Rights

You are allowed to request the data we hold about you and ask Sciens Group to; correct or amend data we hold on you, stop or restrict processing of personal data where there is no legal basis nor purpose to continue to do so, and erase data we hold on you where there are no legal grounds for us to retain. Where processing is based on consent,, you are free at any time to withdraw consent to stop the processing of your personal data

To make any of those requests, please email and specify clearly what you want achieved. Whether you make such access requests personally, via a third party and onwards to a third party, we will have to undertake necessary verification checks to ensure it is a legitimate instruction. There are no costs for such requests unless it is a burdensome task.

Cookies

By using this website, you consent to the use of cookies in accordance with this Policy. You will have seen a pop up to this effect on your first visit to the website; it will not usually appear on subsequent visits but you may withdraw your consent at any time by disabling them by following the instructions set out for your browser [here](#). Some services will not function correctly if cookies are disabled.

Cookies are widely used in order to make websites work efficiently and securely, and to provide information on visitor behaviour to the website owner.

Session cookies are deleted automatically when you close your browser, while persistent cookies remain on your device after the browser is closed (for example to remember your user preferences when you return to the site).

Cookies we use are:

Cookie Name	Source	Purpose
cookie_notice_accepted	Cookie Notice Plugin	This session cookie implements a Microsoft technology which is essential for the operation of our websites. It assigns an identification number to each visitor so they can navigate the site correctly.
_ga, _gid, _ga_*	Google Analytics	Used to distinguish unique users and sessions for the purpose of compiling aggregated, anonymised statistical reports on website usage. These cookies enable Sciens Group to understand visitor behaviour in order to maintain, diagnose and improve the website. No personally identifiable information is collected