

This Privacy Notice explains how Los Angeles Capital Management LLC (“**Los Angeles Capital**”, “**LACM**”, “**we**”, “**us**” and “**our**”), collects, uses, shares and otherwise processes your Personal Data.

This Privacy Notice is for people who are located in the European Economic Area (“**EEA**”), which for purposes of this Privacy Notice is deemed to include the United Kingdom (“**UK**”) unless otherwise stated, and supplements our general [Privacy Statement](#). Our processing of Personal Data of people who are in the EEA is governed by the General Data Protection Regulation (the “**GDPR**”), which for purposes of this Privacy Notice is deemed to include the UK Data Protection Act of 2018 (“**UK GDPR**”) unless otherwise stated. For purposes of the GDPR, we are a data controller of your Personal Data. The GDPR requires us to provide certain information to you which is provided herein.

We may provide supplemental privacy notices on specific occasions when we are collecting or processing Personal Data about you so that you are fully aware of how and why we are using your Personal Data. Those supplemental notices should be read together with this Privacy Notice.

You are under no statutory, contractual, or other obligation to provide us with Personal Data, although it is not possible to use our website or the services we provide (collectively, the “**Services**”) without providing us with certain Personal Data.

Please take the time to read and understand this Privacy Notice.

Personal Data

The term “**Personal Data**” as used in this Privacy Notice means any information relating to you (such as your name, contact details, etc.) that identifies you or can reasonably be used to identify you. Personal Data does not include data from which you can no longer be identified such as anonymised, aggregated or de-identified data.

Personal Data That We Collect

The kinds of Personal Data we may collect include:

Information that you provide to us. This includes information about you that you give to us by completing forms online or by communicating with us, whether face-to-face, by phone, e-mail or otherwise, whether online or offline. This information may include:

- your full name, company name, job title, email address, mailing address, telephone and fax numbers, mobile telephone number, and other information you provide to us directly online, such as information collected for identification purposes; and
- other information that you provide to us in connection with the Services.

Information we collect or generate about you. We may collect information about you when you seek information about us or establish a business relationship with us on behalf of yourself or your organization. This information may include:

- information collected from your organization, such as details about authorised signatories;
- copies of any relevant trust deeds, partnership agreements, constitutions, articles of association or other corporate entity documents;
- information that you disclose to us via <http://www.lacapm.com> (our “**website**”), e.g., by submitting an online form; and
- information we automatically collect when you interact with our website via cookies and other similar technologies, such as technical and navigational information, including what pages you visited, when you entered or left the website, the number of times you visited the website and what site you came from prior to visiting the website. See our [Cookie Policy](#) for more information.

Information from other sources, such as publicly available sources.

We may combine the Personal Data and other information collected on our website with information collected from or about you in other contexts. We will treat such combined information in accordance with this Privacy Notice.

Use of Your Personal Data

Your Personal Data may be stored and processed by us in the following ways and for the purposes for which it was provided to us and for our business purposes, including:

- to perform our obligations and exercise our rights under a contract that Los Angeles Capital has entered into with you or your organization;
- for investments in a commingled fund, to perform our obligations and exercise our rights under a contract that we have entered into with a commingled fund, a third-party management company, fund administrator, fund transfer agent, and fund custodian;
- to provide you or your organization with our products, Services, and reporting;
- to communicate with you, including to notify you about important updates or changes to our products and Services, and address relevant inquiries or complaints;
- to meet our legal obligations and protect our legal rights, including, without limitation, to comply with recordkeeping, reporting, auditing, and tax obligations under applicable law (such as U.S. corporate, tax, sanctions, and anti-money laundering laws);
- for marketing and promotional purposes, consistent with applicable law (for example, we may use your Personal Data, such as your email address, to send you news and newsletters, or to otherwise contact you about our Services or information we think may be of interest to you);
- in the case of Personal Data related to your use of our email system, in order to enable the effective operation of the email system and ensure that it is used in accordance with our policies and procedures;

- in connection with our cybersecurity, incident response and business resiliency programs; and
- for any other purpose, with your consent.

We process Personal Data based on the following legal bases:

- to perform our obligations and exercise our rights in connection with any contract that Los Angeles Capital has entered into with you or your employer;
- to discharge our legal and regulatory obligations;
- in order to establish, exercise or defend our legal rights or for the purpose of legal proceedings;
- as necessary for our legitimate business interests (or the legitimate interests of one or more of our affiliates), such as:
 - allowing us to effectively and efficiently administer and manage the operation of our business; or
 - maintaining compliance with internal policies and procedures;
- you have consented to us doing so.

Disclosure of Personal Data to Third Parties

We may disclose your Personal Data to our affiliates for the purposes of:

- the management and administration of our business and our affiliates' business; and
- assessing compliance with applicable laws, rules and regulations, and internal policies and procedures across our business and our affiliates' businesses.

We will take steps to ensure that the Personal Data is accessed only by our and our affiliates' employees who have a need to do so for the purposes described in this Privacy Notice.

We may also share your Personal Data with third parties outside of our corporate group for the following purposes:

- to third party agents, service providers, and contractors for the purposes of providing services to us, including administrators, transfer agents, broker-dealers, technology and communication service providers, law firms, accountants, consultants, auditors, and other professional advisers. These service providers may collect, process, and retain information about you, in accordance with applicable laws, directly on behalf of us. These third parties will be subject to confidentiality requirements and they will only use your Personal Data as described in this Privacy Policy;
- if we sell any of our business or assets, we may disclose your Personal Data to the prospective buyer for due diligence purposes, and if we are acquired by such third party, we will disclose your Personal Data to the third party buyer; and
- to the extent required by law, for example, if we are under a duty to disclose your Personal Data in order to comply with any legal or compliance obligation, or to establish, exercise or defend our legal rights.

International Users

Your information is maintained and processed by Los Angeles Capital, its affiliates and our third-party service providers in the United States, and may also be maintained, processed, and stored in other jurisdictions that may have different data protection laws than those in your country of residence. In the event that your information is transferred in these ways, please note that we comply with applicable legal requirements governing the transfer of information across borders. By using the Services, you agree to and acknowledge these transfers.

You can obtain more details about the protection given to your Personal Data when it is transferred outside the EEA (including a copy of the standard data protection clauses which we have entered into with recipients of your Personal Data) by contacting us in accordance with the “Contacting us” section below.

Retention and Protection

How long we hold your Personal Data for will vary. The retention period will be as long as necessary to fulfill the purpose for which we are using your Personal Data or as long as required by law or to fulfill our legal obligations.

We will use a variety of physical, electronic, and procedural safeguards to protect your Personal Data from loss, misuse, and unauthorised access, disclosure, alteration, and destruction in accordance with applicable law. Note that despite our best efforts, no data security measures can fully guarantee security all of the time.

Your Rights

You have a number of legal rights in relation to the Personal Data that we hold about you, including:

- the right to obtain information regarding the processing of your Personal Data and access to a copy of the Personal Data;
- where consent is the basis for us processing your Personal Data, and we do not have another legal basis for processing the Personal Data, the right to withdraw your consent at any time;
- in some circumstances, if you have provided Personal Data to us, the right to receive some Personal Data in a structured, commonly used and machine-readable format and/or request that we transmit such Personal Data to a third party where this is technically feasible;
- the right to request that we correct your Personal Data if it is inaccurate or incomplete;
- the right to request that we erase your Personal Data in certain circumstances, provided that in some cases we are legally entitled or required to refuse that request (e.g., if the Personal Data is subject to a legal hold);

- the right to request that we restrict our processing of your Personal Data in certain circumstances, provided that in some cases we are legally entitled to refuse that request; and
- 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 in the “Contacting us” section below.

Children's Privacy

Our Services are not intended for children under the age of 16 and we do not knowingly process Personal Data of children under this age.

Contacting Us

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 contact us by email at privacy@lacapm.com or regular mail as follows:

Los Angeles Capital Management LLC
Attn: Compliance Department
11150 Santa Monica Blvd. Suite 200
Los Angeles, California 90025

You have the right to file a complaint concerning our processing of your Personal Data with your national (or in some countries, regional) data protection authority. The EU Commission has a list of national and regional data protection authorities available [here](#).

Updated: 5 October 2022