

Data Protection Information for EEA Persons

In the course of our correspondence and other dealings with you, we will receive information relating to you and/or, where you act as an agent or a representative of a legal person or other entity (rather than a natural person), information relating to other officers, directors, partners, members or employees of that legal person or other entity (such information, “**personal information**”). Such information is further described under the section headed “What personal information will be collected and used?” If the personal information you provide to us does not relate to you, you agree to provide the disclosures set out below to the individuals whose personal information you have provided.

Personal information of EEA investors is subject to certain legal safeguards specified in the General Data Protection Regulation (2016/679) (“**GDPR**”) and any secondary and domestic legislation implementing the GDPR (together, the “**Data Protection Legislation**”). The Data Protection Legislation prescribes the way in which we may collect, retain and handle personal information. Tweedy, Browne Company LLC (the “**Investment Manager**” or “**we**”) is a ‘controller’ of your personal information for the purposes of the GDPR, and may process, or arrange the processing of, your personal information in connection with your investment with the Investment Manager.

Who do we share your personal information with?

The Investment Manager may share certain of your personal information with the following categories of third parties for the following reasons:

- advisers (e.g. auditors, legal counsel and tax advisers) and other service providers to the Investment Manager relating to or in connection with its business and operations;
- affiliates of the Investment Manager for the purpose of the management of the Investment Manager’s business; brokers, prime brokers, custodians, banking and other financial services providers to enable the Investment Manager to provide services and operate its business; and
- law enforcement agencies; regulatory or tax authorities; and other governmental or public agencies or authorities in order to comply with legal or regulatory obligations or at their request in furtherance of their objectives.

They may in turn use the services of their affiliates or service providers to process your personal information where necessary or appropriate. Where we share your personal information with a third party, we generally take steps to ensure the recipients of that personal information will process it appropriately.

What are the lawful bases for processing your personal information?

We have reviewed the purposes and appropriateness of our activities, and those of the processors of your personal information, in each case, as related to the processing of your personal information.

The lawful bases for processing your personal information are as follows:

Performance of contract: to ensure the ability of the Investment Manager to perform its obligations under an investment advisory contract and/or other contractual documents that together form the basis for an investor’s contractual relationship with the Investment Manager, and certain pre-contractual steps. If an investor does not provide the personal information requested, it will not be possible to accept the investor’s investment.

Legal obligations: the Investment Manager, its affiliates and funds or vehicles advised by the Investment Manager are required to comply with legal and regulatory requirements applicable to them, including, for example, any regulatory or tax reporting requirements; to carry out money laundering/terrorist financing checks, conflict checks, for purposes of fraud prevention, to comply with any applicable auditing or financial reporting requirements; and to comply with information disclosure requests from regulatory, tax or other governmental or public authorities.

In addition to the above lawful bases for processing your personal information, your personal information will also be processed on the basis of the legitimate interests of the Investment Manager, including its legitimate interests:

- to exercise and comply with the rights and obligations at law or under regulation of the Investment Manager and, where appropriate, the funds or vehicles managed by the Investment Manager (where such obligations are set out under the laws of countries outside the European Economic Area (“EEA”), or under a contract to which we are a party);
- to manage and administer our business and to improve our business relationships;
- to communicate with you in respect of any products offered by us;
- to undertake risk assessment and operational control exercises; for statistical and trend analysis; for systems administration, operation, testing and support; and to ensure the security of our information systems;
- to help detect, prevent, investigate, and prosecute fraud and/or other criminal activity;
- to disclose information to a governmental, tax or regulatory body, financial market, broker or other intermediaries, counterparties, court, auditors or other third parties and to conduct compliance activities, when this is in our interests, or in the interests of any of our clients, including where the laws of the member states of the European Economic Area do not require us to do the same;
- to establish, exercise or defend legal claims; and in order to protect and enforce the rights, property, or safety of the Investment Manager and any fund or other vehicle advised by the Investment Manager, or to assist our clients or investors or others to do the same;
- to investigate and respond to any complaints about the Investment Manager and its business or any incidents relating to the Investment Manager and to help maintain quality and to deal with complaints and disputes; and
- to make certain assessments about your eligibility for an investment product offered by us.

When processing your personal information, we will comply with the relevant requirements under the GDPR as applicable to us.

What personal information will be collected and used?

The types of personal information relating to you that the Investment Manager may process may include, for example:

- name, business and/or private email address, postal address and/or telephone number, date of birth, nationality and gender;
- domicile and other geographic location data;
- bank account details, source of wealth information, account information, bank statements, payment instructions, and tax identification number;
- information relating to regulatory status or eligibility to make investments; and
- copies of passports and other documentation required for identity or address verification purposes.

How do we use your personal information?

We will process your personal information in order to market our investment products, to process queries, undertake normal investment business activities in order to offer our services and manage assets on behalf of clients, to exercise our rights at law or under contract and, where required, in order to comply with applicable legal and regulatory obligations. This may include, without limitation, establishing investor eligibility, preventing fraud, carrying out money laundering checks or conflict checks, and reporting to national and international regulatory bodies.

We may also process personal information to manage and administer our business and to improve relationships with our clients and service providers, and for marketing and business development activities.

We may share your personal information with third parties (including legal advisers and law enforcement agencies) in order to respond to investigations, court orders, legal process, or to investigate, prevent or take action regarding illegal activities, suspected fraud, or as otherwise as required by law.

We may also use personal information in order to provide you with information about investments or products you may be interested in. If you object to being contacted in respect of prospective products, please contact the Investment Manager at info@tweedy.com.

Transfers of your personal information outside Europe.

We may share certain of your personal information with advisers, service providers and regulatory, tax or other governmental or public authorities outside the EEA. Accordingly, your personal information may be transferred to at least the following jurisdictions:

- U.S.A.
- Switzerland
- United Kingdom*
- Canada

Where we share your personal information with persons outside of the EEA we will, where possible, take appropriate steps to ensure it is adequately protected in compliance with the requirements of the Data Protection Legislation. We may seek to do this by entering into appropriate data transfer agreements with third party recipients of your personal information incorporating standard contractual clauses approved by the European Commission governing the transfer of data outside the EEA. Please contact us if you would like a copy of the standard contractual clauses.

** Upon the withdrawal of the United Kingdom from the relevant international treaties.*

How long is your personal information retained?

We will not retain your personal information for longer than is necessary in relation to the purposes for which your personal information is processed. Generally, the Investment Manager will retain your personal information concerning your investment for up to 7 years after you have exited your investment. Certain more limited information relating to your investment may be kept for longer periods. Personal information may be retained for longer if it is required by law, or by a tax or regulatory authority, a law enforcement agency or other governmental or public body, or considered necessary in order to allow the Investment Manager or a fund or vehicle managed by the Investment Manager, or their affiliates, to act in accordance with their specific set of circumstances, for example, in light of an actual or potential legal action or a regulatory investigation.

Your rights in relation to the personal information we process about you.

You have various rights under the Data Protection Legislation in relation to your personal information. These include:

- the right to request access to your personal information;
- the right to have your personal information rectified;
- the right to have your personal information erased in certain circumstances;
- the right to request that your personal information is only used for restricted purposes;
- (if the lawful basis for processing your personal information is legitimate interest) the right to object to your personal information being processed, for example, for marketing;
- (in some circumstances) the right to require certain of your personal information to be transferred to you or a third party; and
- the right to lodge a complaint with the relevant data regulator in your jurisdiction.

You can seek to exercise any of these rights by contacting us at info@tweedy.com

Questions or complaints

If you have any questions or complaints regarding the processing of your personal information, please contact us directly.

Complaints regarding the processing of your personal information by the Investment Manager may also be made directly to the relevant data protection regulator in the EU.