

## CAMBIUM GLOBAL TIMBERLAND LIMITED

### PRIVACY NOTICE

Cambium Global Timberland Limited (incorporated in the Island of Jersey as a closed-ended investment company limited by shares with registered number 95719 as a closed-ended collective investment scheme with the JFSC and the Shares are listed on the Alternative Investment Market ("AIM") a market of the London Stock Exchange (the "**Company**", "**we**", "**us**" or "**our**") is committed to protecting the privacy of individuals whose data it processes ("**you**" or "**your**").

#### Structure of this notice

This privacy notice is provided in a layered format so you can click through to the section which relates to the information that we collect about you below.

1. IMPORTANT INFORMATION AND WHO WE ARE
2. CATEGORIES OF DATA SUBJECTS
  - (A) INVESTORS
  - (B) VISITORS TO OUR WEBSITE
3. DISCLOSURES OF YOUR PERSONAL DATA
4. INTERNATIONAL TRANSFERS
5. DATA SECURITY
6. YOUR LEGAL RIGHTS
7. FURTHER INFORMATION

#### 1. IMPORTANT INFORMATION AND WHO WE ARE

Cambium Global Timberland Limited (the "**Company**", "**we**", "**us**" or "**our**") is committed to protecting the privacy of individuals whose data it processes ("**you**" or "**your**") as a controller of data relating to shareholders and/or potential investors in the Company.

This privacy notice aims to give you information on how the Company collects and processes your personal data as a controller of data supplied by shareholders and potential investors in connection with holdings and/or investing in the Company including through your use of this website, by signing up to our newsletter and/or by sending us correspondence.

In addition, it outlines your data protection rights under the EU data protection regime introduced by the General Data Protection Regulation (Regulation 2016/679) (the "**GDPR**") and the Data Protection (Jersey) Law, 2018 (the "**New DPL**") (the GDPR and the New DPL together constituting the "**Data Protection Laws**").

This website is not intended for children and we do not knowingly collect data relating to children.

Please contact the Company c/o Praxis Fund Services(Jersey) Limited at Charter Place, 23/27 Seaton Place, St Helier, Jersey, JE1 1JY, Channel Islands(marked for the attention of the The Data Protection Manager) or by email to [DPM.PFS.Jersey@praxisifm.com](mailto:DPM.PFS.Jersey@praxisifm.com) if you have any queries in relation to the processing of your personal data under this notice. The Company may from time to time update this notice. Please refer back to this page regularly to see any changes or updates to this notice.

## **2. CATEGORIES OF DATA SUBJECTS**

### **(A) INVESTORS**

The following section of this notice sets out how the Company, as controller of personal data supplied by, and collected in relation to, shareholders and potential investors in the Company, will process such personal data.

We may hold personal data about investors in the Company which is provided to us by you directly as a result of your holding and/or investment in the Company (by completing application forms, through our website, telephone calls and/or corresponding with us) or which is provided to us by third parties including [tax authorities, government and competent regulatory authorities to whom we have regulatory obligations, publically available directories and sources, background check providers and credit, fraud and detection agencies and bankruptcy registers]<sup>1</sup>. We may also process personal data about individuals that are connected with you as an investor (for example directors, trustees, employees, representatives, beneficiaries, shareholders, investors, clients, beneficial owners or agents).

In connection with your holding and/or investment in the Company, we may collect, store, and use the following categories of personal information about you:

- information obtained from identification documentation (including name, former names, title, gender, contact details, including address, telephone number, personal email address, fax number, date and place of birth, nationality and national identify numbers (where applicable));
- employment history, qualifications, professional memberships, income and personal wealth, and details relating to your investment activity;
- professional references;
- tax status and tax identification numbers;
- shareholder reference number (SRN) (where applicable);
- bank account details, including bank name, account number and sort code;
- power of attorney details (where applicable);
- other information provided to conduct AML/CFT checks.

Your personal data may be processed by the Company or its sub-processors (or any of their affiliates, agents, employees, delegates or sub-contractors) for the following purposes:

- (a) to provide you with information on the Company (including performance updates), which is being carried out to pursue the Company's legitimate interests;
- (b) to allow us to administer and manage your holding in the Company (including fee calculations and the payment of dividends) which are necessary for the Company to comply with applicable laws and/or in its legitimate interest;
- (c) to update and maintain records for the Company, including maintaining statutory registers, which is necessary to comply with the Company's legal obligations;
- (d) to carry out anti-money laundering checks and other actions in an attempt to detect, prevent, investigate and prosecute fraud and crime, which the Company considers necessary for compliance with the Company's legal obligations, for the performance of a task being carried out in the public interest and/ or to pursue the Company's legitimate interests (including for the prevention of fraud, money laundering, sanctions, terrorist financing, bribery, corruption and tax evasion);
- (e) to prepare tax related information in order to report to tax authorities in compliance with a legal obligation to which the Company is subject;
- (f) to scan and monitor emails sent to us (including attachments) for viruses or malicious software, to process and encrypt personal data to protect and manage email traffic, and to store personal data on our systems to pursue our legitimate interests including for document retention purposes; and
- (g) such other actions as are necessary to manage the activities and/or to comply with the legal obligations of the Company, including by processing instructions, [monitoring and recording electronic communications (including telephone calls and emails) for quality control, analysis and training purposes]<sup>2</sup> and enforcing or defending the rights and/or interests of the Company, in order to comply with the Company's legal obligations and/or to pursue the Company's' legitimate interests.

Where such processing is being carried out on the basis that it is necessary to pursue the Company's legitimate interests, such legitimate interests are not overridden by your interests, fundamental rights or freedoms. Such processing may include the use of your personal data for the purposes of sending you electronic marketing communications, in relation to which you can at any time subscribe by following the instructions contained in each marketing communication.

The Company does not anticipate being required to obtain your consent for the processing of your personal data as listed above. If the Company wishes to use your personal data for other purposes which do require your consent, the Company will contact you to request this.

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. [Details of retention periods for different aspects of your personal data are available in our retention policy which you can request from us by contacting us at c/o Praxis Fund Services (Jersey) Limited Charter Place, 23/27 Seaton Place, St Helier, Jersey, JE1 1JY, Channel Islands (marked for the attention of the The Data Protection Manager) or by email to [DPM.PFS.Jersey@praxisifm.com](mailto:DPM.PFS.Jersey@praxisifm.com)

## **(B) VISITORS TO OUR WEBSITE**

The following section of this notice sets out how the Company may process personal data (as a controller) about visitors to its website.

We may collect, use, store and transfer different kinds of personal data about you which you provide to us through our website: name, date of birth, address, email address, telephone numbers, technical data (including internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website, usage data (including information about how you use our website, products and services, and marketing and communications preferences (including your preferences in receiving marketing from us and your communication preferences).

[We do not collect any sensitive personal data or special categories of personal data about you through our website (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences

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

- direct interactions with you, including by filling in forms. This includes personal data you provide when you subscribe to our publications and/or request marketing to be sent to you.
- Automated technologies or interactions. As you interact with our website, 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. Technical data from the following parties:

- (a) analytics providers such as Google based outside the EU;
- (b) search information providers <https://support.cloudflare.com/hc/en-us/articles/200170156-What-does-the-Cloudflare-cfuid-cookie-do>

We will use your personal data in the following circumstances: where it is necessary for our legitimate interests, or those of a third party (including in relation to the sending of electronic marketing communications) and where your interests and fundamental rights are not overridden by those interests, or where we need to comply with a legal or regulatory obligation.

Your personal data may be processed by the Company or its sub-processors (or any of their affiliates, agents, employees, delegates or sub-contractors) for the following purposes:

- to send you updates on the performance of the Company, newsletters, invitations to events and other electronic marketing communications which we will do (a) on the basis of our legitimate interests if you are an investor in the Company or if we are sending electronic marketing communications to corporate subscriber email addresses (eg name@company.com) or (b) with your consent;
- to use data analytics to improve our website, marketing, customer experiences on the basis of our legitimate interests;
- to comply with legal or regulatory requirements;
- to scan and monitor emails sent to us (including attachments) for viruses or malicious software, to process and encrypt personal data to protect and manage email traffic, and to store personal data on our systems to pursue our legitimate interests including for document retention purposes; and
- such other actions as are necessary to manage the activities of the Company, including by processing instructions, [monitoring and recording electronic communications (including telephone calls and emails) for quality control, analysis and training purposes] and enforcing or defending the rights and/or interests of the Company, in order to comply with their legal obligations and/or to pursue their legitimate interests.

If we consider it necessary to obtain your consent in relation to the use of your personal data (such as for sending emails to individuals that have not invested in the Company), we will contact you to request this consent. In such circumstances, we will provide you with full details of the personal data that we would like and the reason we need it, so that you can carefully consider whether you wish to consent. If you decide to provide your consent, you have the right to withdraw your consent at any time, although that will not affect the lawfulness of processes based on consent before its withdrawal. To withdraw your consent or to opt out of receiving marketing communications, please contact us at c/o Praxis Fund Services (Jersey) Limited, Charter Place, 23/27 Seaton Place, St Helier, Jersey, JE1 1JY, Channel Islands (marked for the attention of the The Data Protection Manager) or by email to [DPM.PFS.Jersey@praxisifm.com](mailto:DPM.PFS.Jersey@praxisifm.com) or following the unsubscribe instructions included in each electronic marketing communication. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

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. [Details of retention periods for different aspects of your personal data are available in our retention policy which you can request from us by contacting us at c/o Praxis Fund Services (Jersey) Limited,

Charter Place, 23/27 Seaton Place, St Helier, Jersey, JE1 1JY, Channel Islands (marked for the attention of the The Data Protection Manager) or by email to [DPM.PFS.Jersey@praxisifm.com](mailto:DPM.PFS.Jersey@praxisifm.com).

Where the website provides links to other websites, the Company is not responsible for the data protection/privacy/cookie usage policies of such other websites, and you should check these policies on such other websites if you have any concerns about them. If you use one of these links to leave our website, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting a linked website and such websites are not governed by this notice. You should always exercise caution and review the privacy policy applicable to the website in question.

**Cookies:** A cookie is a small file which asks permission to be placed on your computer. Once you agree, the file is added and the cookie helps analyse web traffic or lets you know when you visit a particular website. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences.

We use traffic log cookies to identify which pages are being used. This helps us analyse data about web page traffic and improve our Website by tailoring it to the needs of users. We only use this information for statistical analysis purposes.

Overall, cookies help us provide a better website by enabling us to monitor which pages users find useful and which they don't. A cookie does not give us access to a user's computer or any information about them, other than the data they choose to share with us.

The browsers of most computers, smartphones and other web-enabled devices are usually set up to accept cookies. If your browser preferences allow it, you can configure your browser to accept all cookies, reject all cookies, or notify you when cookies are set. Each browser is different, so check the "Help" menu of your browser to learn about how to change your cookie preferences.

However, please remember that cookies are often used to enable and improve certain functions on our website. [If you choose to switch certain cookies off, it will affect how our website works and you may not be able to access all or parts of our website.]<sup>3</sup>

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly.

You can find more information about the individual cookies that we use and the purposes for which we use them below:

Cookie	Cookie Name	Purpose
Google Analytics	<i>utma</i>	Used to distinguish users and sessions. The cookie is created when the javascript library executes and no existing utma cookies exists. The cookie is updated every time data is sent to Google Analytics. [Duration 2 years from set/update]
	<i>utmb</i>	Used to determine new sessions/visits. The cookie is created when the javascript library executes and no existing __utmb cookies exists. The cookie is updated every time data is sent to Google Analytics. [Duration 30mins from set/update]
	<i>utmc</i>	Not used in ga.js. Set for interoperability with urchin.js. Historically, this cookie operated in conjunction with the __utmb cookie to determine whether the user was in a new session/visit. [Duration end of browser session]
	<i>utmz</i>	Stores the traffic source or campaign that explains how the user reached your site. The cookie is created when the javascript library executes and is updated every time data is sent to Google Analytics. [Duration 6 months from set/update]

For further details on cookies (including how to turn them off) can be found at [www.allaboutcookies.org](http://www.allaboutcookies.org).

### 3. DISCLOSURES OF YOUR PERSONAL DATA

We will not disclose personal information we hold about you to any third party except as set out below.

We may disclose your personal data to other members of our group, to third parties who are providing services to us, including IT service providers, processors of the Company (including the investment manager, printers, registrars, administrators, depositaries, custodians) telephone service providers, document storage providers, backup and disaster recovery service providers and to tax authorities, appointed tax agents, appointed professional advisers, including legal advisers and those providing shareholder related services, stock brokers and market makers, Banks and other regulated financial services providers, global payment service providers, technology service providers used in the administration (including voting arrangements) of company AGMs, EGMs and other statutory meetings, registry and depositary interest service providers, corporate sponsored nominee service providers and their authorised sub-processors.

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.

#### **4. INTERNATIONAL TRANSFERS**

The Company is a controller incorporated in Jersey and as such will be bound to comply with the New DPL. As the Company will be processing personal data of shareholders and potential investors who are in the European Union, the Company will also be required to comply with the GDPR. The New DPL substantially mirrors the requirements of the GDPR in relation to the processing of personal data and it is hoped that Jersey's existing adequacy ruling by the European Commission for data protection purposes will be unaffected or reconfirmed.

Some of the external service providers used by the Company are based in jurisdictions outside of Jersey and the European Economic Area (EEA) that are not deemed to have data protection frameworks that are equivalent to those of the EEA or are not designated jurisdictions under Jersey data protection legislation so their processing of your personal data will involve a transfer of data outside the EEA.

Whenever your personal data is transferred out of the EEA by us, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission. For further details, see European Commission: Adequacy of the protection of personal data in non-EU countries.
- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe. For further details, see European Commission: Model contracts for the transfer of personal data to third countries.
- Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US. For further details, see European Commission: EU-US Privacy Shield.

Please contact us if you want further information on the specific mechanism used when transferring your personal data out of the EEA.



## **5. 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 employees, 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.

## **6. YOUR LEGAL RIGHTS**

In certain circumstances, by law you have the right to:

- Request access to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- Request rectification (correction) of the personal information that we hold about you without undue delay. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- Request erasure of your personal information without undue delay. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- Object to processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- Data portability and to request the transfer of your personal information to another party.
- Receive personal data in a structured, commonly used and machine-readable format.
- Notification of rectification, erasure and restrictions.

- Withdraw your consent. If we are processing your personal data on the basis of your consent, you have the right to withdraw such consent at any time. Withdrawing your consent will not affect the lawfulness of processes based on consent before its withdrawal. To withdraw your consent or to opt out of receiving marketing communications, please contact us at c/o Praxis Fund Services (Jersey) Limited, Charter Place, 23/27 Seaton Place, St Helier, Jersey, JE1 1JY, Channel Islands (marked for the attention of the The Data Protection Manager) or by email to [DPM.PFS.Jersey@praxisifm.com](mailto:DPM.PFS.Jersey@praxisifm.com) or follow the unsubscribe instructions included in each electronic marketing communication. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.
- The right to lodge a complaint and the right to judicial review in certain situations.

If you wish to exercise any of the rights set out above, please contact us in writing at c/o Praxis Fund Services (Jersey) Limited, Charter Place, 23/27 Seaton Place, St Helier, Jersey, JE1 1JY, Channel Islands (marked for the attention of the The Data Protection Manager) or by email to [DPM.PFS.Jersey@praxisifm.com](mailto:DPM.PFS.Jersey@praxisifm.com).

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

You have the right to make a complaint at any time to the Office of the Information Commissioner Commissioner the Jersey supervisory authority for data protection issues (<https://oicjersey.org/>). We would, however, appreciate the chance to deal with your concerns before you approach the ODPC so please contact us in the first instance at our address given below.

## **7. FURTHER INFORMATION**

If you have any queries about this notice or your personal data, or you wish to submit an access request or raise a complaint about the way your personal data has been handled, please do so in writing and address this to us c/o Praxis Fund Services (Jersey) Limited, Charter Place, 23/27 Seaton Place, St Helier, Jersey, JE1 1JY, Channel Islands (marked for the attention of the The Data Protection Manager) or by email to [DPM.PFS.Jersey@praxisifm.com](mailto:DPM.PFS.Jersey@praxisifm.com)

Issues or concerns individuals have regarding their personal data can also be brought to the attention of the ODPC. The details of the ODPC are set out below.

The Office of the Information Commissioner  
Office of the Information Commissioner  
4th Floor  
1 Liberty Place  
St Helier  
Jersey

JE2 3NY  
Email: [enquiries@oicjersey.org](mailto:enquiries@oicjersey.org)  
Telephone: +44 (0)1534 716530

Cambium Global Timberland Limited is incorporated in the Island of Jersey under the Companies (Jersey) Law, 1991, as amended, as a close ended investment company limited by shares with registered number 95719 and registered as a registered closed-ended collective investment scheme with the JFSC.

Data Protection and Privacy Policy

December 2019