



# Privacy Policy

We understand that you entrust us with your personal information. That's why we are committed to maintaining that trust and safeguarding and preserving your privacy.

This Privacy Policy together with the materials referred to in it describes how we handle the personal information which we collect from you or which you provide to us.

Your use of our website and the provision of information to us (by whatever means) indicates your acceptance of our Privacy Policy and you consent for us to collect and use your personal information according to this policy. Please take a moment to read and familiarise yourself with the steps we take to protect your personal information.

## Information we collect from you

We\* may collect and process personal information about you from any of the following sources:

- **Information you give us.** You may give us information about yourself by filling in forms on our website or by corresponding with us by phone, e-mail or otherwise. This includes information you provide when you submit documentation to us, register to use our website, subscribe to our services, transact in our funds, interact with our personnel and when you provide feedback. The information you give us may include your name, date of birth, address, tax identification number, e-mail address and phone number, financial and bank information.
- **Information we collect about you.** With regard to each of your visits to our site we may automatically collect technical information, including the Internet Protocol (IP) address used to connect your computer to the internet and your login information, and information about your visit, including, for example, pages visited, reports and documents downloaded and videos watched.
- **Information we receive from other sources.** We work closely with a number of third parties who provide services to us and may receive information about you from them.
- Other sources with your consent or with the consent of your representative.

## Where we store your personal information

We maintain physical, electronic, and procedural safeguards to protect personal information. All information we store electronically is stored on our secure servers. We have servers that are located in the European Economic Area (EEA), as well as outside the EEA. The information that we collect from you may be transferred to, and stored at, a destination outside the EEA and may also be processed by personnel operating outside the EEA who work for us or for one of our service providers. When you provide us with your personal information, you agree to its transfer, storing and processing.

Even though we have taken significant steps to ensure that your personal information is not misused, we cannot fully eliminate security risks associated with the storage, use and transmission of personal information.

We store your personal information for as long as we reasonably believe is necessary in connection with the provision of products and services to you. We are obliged by law and by our regulators to keep certain information associated with your account for a period after your account has been closed.

## We may use information held about you in all or any of the following ways

- To meet our legal and regulatory requirements
- To carry out our obligations to you and to provide you with the information, products and services that you request from us

- To ensure that content on our website is presented to you in the most effective manner
- To improve our products and tools
- To notify you about changes to our products or services

## **Disclosure of your information**

**We will not sell your personal information or share it with third parties for use in marketing their products and services.**

We may share your personal information with any current or future members of the Orbis Group of companies. In order to provide an efficient and legally compliant service, and for the performance of any contract we enter into with you, we may also share your information with selected third party service providers, including those that provide professional, legal or accounting advice, their affiliates, agents or delegates and to their successors who may process the information in various jurisdictions. We require these service providers to maintain the confidentiality of personal client information received, and to use the information only in the course of providing such services.

We may, and our service providers may, disclose your personal information to third parties under applicable law or regulation, or to regulatory or law enforcement officials and where necessary to prevent illegal activities, such as fraud. Also regulatory authorities or law enforcement officials in the jurisdictions to which any data is transferred may require the disclosure of such information.

## **Cookies**

We use cookies and similar tools on our website to improve its performance and enhance your user experience. Cookies are small text files which a website may put on your computer when you first visit a site or page. The cookie will help our website to recognise your device the next time you visit. We use the term "cookies" in this policy to refer to all files that collect information in this way. For information on how cookies are used on our website and how to manage and delete cookies please see [here](#).

## **Links to other websites**

Our website may contain links to other websites of interest. However, once you have used these links to leave our site, you should note that we do not have any control over that other website and cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites. Please note that Orbis is not affiliated with, nor does it sponsor or endorse, any linking websites owned by third parties and it does not endorse any product or service offered by such linking sites.

## **Changes to our Privacy Policy**

We update our Privacy Policy from time to time. Updated versions of this policy will be posted on our website and, where appropriate, will be sent to you by email. This policy is effective from April 2015.

## **Contact**

If you have any questions, comments or queries regarding our Privacy Policy please contact us at [clientservice@orbis.com](mailto:clientservice@orbis.com).

*\* Investors in Orbis SICAV should note that Orbis SICAV is the data controller under Luxembourg law of 2 August 2002 on the protection of persons with regard to the processing of personal data. Investors in Orbis SICAV should refer to the Data Protection section of the Orbis SICAV prospectus for a more detailed description of the treatment of their personal information and their rights under Luxembourg law.*