

US Privacy Policy (Privacy Notice & Opt-Out)

Privacy Policy

TT International Asset Management Ltd (“TT”) is subject to a number of international laws and regulations that require it to adopt policies and procedures to protect the “non-public personal information” of natural person consumers and customers and to disclose to such persons its policies and procedures for protecting that information. As a registered Investment Advisor firm, SEC Regulation S-P requires TT to develop appropriate safeguards for any record containing non-public personal information in order to ensure that such information is:

1. Kept secure and confidential,
2. Protected against reasonably anticipated threats to its security or integrity, and
3. Protected against unauthorised access or use that might result in substantial harm or inconvenience to its clients.

Additionally, when disposing of consumer report information, TT will take reasonable steps to protect the confidentiality of the records following such disposal and to guard against unintended or unauthorised disposals.

We are committed to protecting your privacy and want you to feel confident that when you provide us with information you can expect us to use it in a secure and private manner. TT’s US Privacy Policy explains what information it might collect, the ways in which it might collect that information and the ways in which TT might use that information.

In this Privacy Policy:

- “Data” means any personal and financial information about an individual (or corporations in countries in which this applies), including information that may constitute personal data under the EU Data Protection Directive and implementing laws;
- “Service Agents” refers to the third parties, including administrators, investment managers, custodians, transfer agents, securities brokers and other third party businesses that we use to conduct many aspects of our business;
- “we”, “us” or “our” means TT International Asset Management Ltd, any company owned by TT International Asset Management Ltd, their subsidiaries, funds managed by TT International Asset Management Ltd (“Funds”) and any associates, successors, assigns and transferees of any of them; and
- “you” and “your” means any individuals or in relation to which we may control or process Data.

Privacy Notice

In order to satisfy various US regulatory requirements, further to this policy, TT will also provide to individual consumers a clear and conspicuous US Privacy Notice that accurately reflects its privacy policies and practices no later than the time a customer relationship is established. TT will also send a subsequent US Privacy Notice at least once in any period of twelve consecutive months during which the customer relationship continues to exist.

How we Collect Data

We may collect Data about you:

- (a) when you or an agent of yours contacts us in relation to our business and services that we offer;
- (b) when you complete documents to retain us as an investment manager, adviser or consultant and otherwise during the course of our relationship with you;
- (c) from Service Agents and other third parties that assist us in conducting our business; and

(d) when you use our website.

Types of Data We Might Collect

During the course of our relationship with you we may collect and process Data about you, including:

- (a) personal information such as your name, address, telephone number, email address, your social security number or other tax identification number, age, employment information, and information on your family members;
- (b) corporate information;
- (c) details of the services we provide or have provided to you;
- (d) details of your purchases and redemptions of shares of the Funds;
- (e) detailed financial information, including details about your investment portfolio, income levels and sources of income, investment experience and investment objectives; and
- (f) information regarding relationships you have with banks and/or other financial institutions (including bank details).
- (g) Information we may receive from our due diligence, such as your credit worthiness and your credit history

How We Use Your Data

Your Data are collected in order effectively and properly to manage your account(s) with us. We may use the Data for a number of different purposes, including;

- (a) to provide to you investment services and to carry out obligations arising from any agreements entered into between you and us;
- (b) to provide you with information, products or services that you request from us (including through our website) or which we feel may interest you, where you have consented to be contacted for such purposes;
- (c) to make our procedures more efficient, to implement security measures and to combat fraud and other crimes; and
- (d) to notify you about changes to our products and services.

We may keep your information for a reasonable period for these stated purposes.

If at any time you wish to be removed from marketing mailing lists or for any limits to be applied with respect to marketing materials received by you, please let us know. You can do this by e-mailing info@ttint.com or by calling +44 (0)20 7509 1000.

How We Disclose Your Data

As we use Service Agents to conduct many aspects of our business, we may disclose to them and their affiliates Data that you have provided to us in order to fulfil the purposes for which we hold the Data. These Service Agents may disclose such Data to each other and to each other's affiliates in order to achieve the same purposes.

We and our Service Agents may also be required to disclose your Data to governmental agencies, self-regulatory organisations, industry associations and similar bodies in order to fulfil legal and regulatory requirements. In addition, the laws of certain countries and states give people involved in lawsuits and other legal proceedings the right under certain circumstances to obtain information from us and our Service Agents, including your Data. We and our Service Agents will comply with these laws to the extent we are required to do so.

We may at some stage re-organise or transfer all or part of our business. This may result in the transfer of your Data to new entities or third parties through which the whole or part of our business will be carried out. In such

circumstances, we shall use reasonable endeavours to contact you prior to disclosing your Data. You acknowledge this might not be technically or commercially feasible in all circumstances.

We will not sell your Data to any third party. We obtain from our Service Agents confidentiality agreements that prohibit them from selling or improperly using your Data.

How and Where We Store Your Data

To safeguard your Data we and our Service Agents maintain physical, electronic and procedural safeguards that are designed to comply with applicable legal standards.

The Data that we collect or hold in relation to you may be transferred to, and stored at, a destination outside the European Economic Area (“EEA”). It may also be processed by staff operating outside the EEA who works for us or for one of our Service Agents. In some cases, the laws of the destination country may not provide the same level of data protection as countries within the EEA. However, all Data wherever they are held by us will be afforded a high level of protection against any unauthorised or accidental disclosure, access or deletion. By submitting your Data you agree to this transfer, storing or processing.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your Data, we cannot guarantee the security of your Data transmitted to or by us electronically. Any such transmission is at your own risk.

Cookies

A cookie is a small element of data that a website can send to your computer’s browser so that your computer will be recognised by our website on your return. Cookies contain information that is transferred to your computer’s hard drive. Cookies allow our web server to recognise your computer on connection to our website in order to help improve your experience when you use our website and generally to help us maintain and improve the website for all users.

You may refuse to accept cookies by activating the relevant setting on your web browser that allows you to control the setting of cookies. However, for optimal use of our website we recommend that you do not block the recording of cookies on your computer as it may prevent you from accessing certain areas or features of our website.

For more information about cookies, please see the Information Commissioner’s website home page (<http://www.ico.gov.uk>).

Links to Other Websites

Our website may, from time to time, contain links to and from other websites. If you follow a link to any of these websites please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any Data to these websites.

Changes to this Policy

If TT adopts material changes to its privacy policies in the future, we will provide each customer with a revised notice reflecting the new privacy policies. Additionally, TT will make both its US Privacy Policy and US Privacy Notice

available to customers on request. Copies of TT's US Privacy Policy will be posted on our website (www.ttint.com). We recommend you check the contents of this page regularly to ensure that you are aware of any such changes.

Access to and Changes to Your Data

You have the right to access Data that we hold about you. For a copy of your Data, please contact the Data Protection Team (contactable at dataprotection@ttint.com). Please note that we may charge a small administrative fee in relation to any access requests.

We want to ensure that the Data we hold about you is accurate. You may ask us to correct or remove information you think is inaccurate by using the same contact details.

Consent

By continuing to provide us with Data, you consent to our use of your Personal Data as set out in this Privacy Policy. Please do not send us any Data if you do not want that Data to be used by us in this manner.

Contact

Questions, comments and requests regarding our US Privacy Policy are welcomed and should be sent:

- By e-mail to dataprotection@ttint.com
- By post to: TT International Asset Management Ltd, 62 Threadneedle Street, London, EC2R 8HP.