
Privacy and Cookies Policy

GDPR privacy Policy

June 2025



In this Policy, "Record", "we", "us" and "our", refers to Record Currency Management Limited, registered in the United Kingdom with registered office at Morgan House, Madeira Walk, Windsor, Berkshire SL4 1EP. Record Currency Management Limited's company registration number is 01710736.

Record is committed to safeguarding information provided to us by any third parties ("you") (including its clients, investors and all visitors to the website www.recordcm.com (the "Website")) from which any individual can be identified, such as names, contact details and ID data ("Personal Information"). To the extent that any Personal Information is collected, it will be held in confidence in accordance with the Data Protection Legislation (as defined below). Please read the following Privacy and Cookies Policy which explains how we use and protect your information.

We will only use Personal Information which is provided to us, or otherwise obtained by us, as set out in this Policy. We will ensure that your Personal Information is handled in accordance with the "Data Protection Legislation" (meaning any law applicable from time to time relating to the processing of Personal Information and/or privacy as the same may be re-enacted, applied, amended, superseded, repealed or consolidated, including without limitation the UK General Data Protection Regulation (UK GDPR), the UK Data Protection Act 2018, the General Data Protection Regulation (EU) 2016/679, and the Privacy and Electronic Communications (EC Directive) Regulations 2003, in each case including any legally binding regulations, directions and orders issued from time to time under or in connection with any such law).

By visiting and/or contacting us through the Website (or otherwise engaging with us), you acknowledge that we may collect, use and transfer your Personal Information as set out in this Policy. Record reserves the right to change this Policy from time to time and you should therefore check this page frequently to ensure that you are happy with any changes.

For the purposes of the Data Protection Legislation, Record is deemed to be the "data controller" in respect of any Personal Information that you provide to us or we otherwise obtain about you.

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1. Personal Information that we collect from you

When you engage with us (e.g. sending us emails, contacting us via telephone or visiting or making an enquiry through the Website), you may provide Personal Information about yourself including your name and work contact details (e.g. work address, email address and telephone number). Although you engage with us as a professional or representative of an institutional investor, we are still likely to receive some Personal Information from you (e.g. email address, tax information, investment history and/or bank details). Where you make use of our Website we may also collect information about your use of the Website (e.g. your IP address and choice of web browser). Some of this Personal Information is collected and processed so we can perform a contract with an institutional investor in which you are affiliated, some for the purpose of legal compliance and some for the purposes of our legitimate business interests (namely to carry out and improve our business, analyse the use of our Website and services and support our staff, clients and investors).

In order to comply with our legal obligations and for training purposes, we record all calls made on certain employees' landline and mobile telephone lines.

Where you provide Personal Information on behalf of another individual, you are responsible for notifying that individual that you have provided their Personal Information to us and directing them to this Policy so they can see how we will process their Personal Information.

2. Personal Information that we receive from other sources

We may receive information from third parties who collect Personal Information from you and pass it on to us. For example (i) where we are conducting due diligence or deciding whether to acquire or invest in third parties we may also receive Personal Information concerning key personnel; (ii) where another individual makes an investment on your behalf, they may provide us with certain Personal Information to effect the transfer of the investment to you, such as your name and contact details; and (iii) your employer may provide your Personal Information to us in connection with a service they provide to us or in connection with services that we provide to our investors. Where this is the case the third party is responsible for informing you that they have shared your Personal Information with us, directing you to this Policy and obtaining any relevant consents from you to ensure you are happy with the ways in which your Personal Information will be shared. However, once we are holding it, we will only handle any person's Personal Information in accordance with this Policy.

3. Sensitive Personal Information

"Sensitive Personal Information" (sometimes also called "special category" personal information) is particular types of Personal Information, for example, information concerning an individual's race, ethnic origin, religious beliefs, health, political opinions or sexual orientation.

You may provide us with Sensitive Personal Information from time to time in connection with our provision of currency services or otherwise (for example, we may need to obtain information as to whether you are a politically exposed person as part of a "know your client" process or you may give us an indication of your religious beliefs in telling us your dietary requirements for an event). In such cases, the provision of this information is entirely voluntary, however, we may be unable to carry out some activities necessary to process your application, instructions or other requests without the provision of such information. For example, we may be unable to process application forms or similar requests. We will use any Sensitive Personal Information in accordance with the purpose for which it was (i.e. with your consent) and, where necessary, we may also process such information in the establishment, exercise or defence of legal claims.

Where we do receive Sensitive Personal Information, we will only keep such information for as long as strictly necessary in order to comply with our rights and obligations under the law.

4. What we do with your Personal Information

The law requires us to have a legal basis for collecting and using your personal data. We rely on one or more of the following legal bases:

Performance of a contract with you: Where we need to perform the contract we are about to enter into or have entered into with you.

Legitimate interests: We may use your personal data where it is necessary to conduct our business and pursue our legitimate interests, for example to prevent fraud and enable us to give you the best and most secure customer experience. We make sure we consider and balance any potential impact on you and your rights (both positive and negative) before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).

Legal obligation: We may use your personal data where it is necessary for compliance with a legal obligation that we are subject to. We will identify the relevant legal obligation when we rely on this legal basis.

Consent: We rely on consent only where we have obtained your active agreement to use your personal data for a specified purpose, for example if you subscribe to an email newsletter.

We will only use your Personal Information in order to (a) provide our services, (b) provide client or investor relations and support to an institutional client or investor with which you are affiliated, (c) in our legitimate interests to improve our Website and services, (d) comply with our own legal and regulatory obligations, including in relation to financial promotion, applicable anti-money laundering and counter-terrorist financial legislation, the Common Reporting Standard and FATCA, and (e) for our internal business processes, including providing support to our staff.

Where you have explicitly consented at the time we collected your Personal Information or where we otherwise have a right to do so, we may also use your Personal Information to let you know about any of our services that may be of interest and/or inform you about important changes or developments to our services by email.

Where you or your employer (or any other entity you work for) provides services to us, you and/or they may provide us with some of your Personal Information in connection with the provision of the services, such as your name, business contact details and other ID information. We will only process such Personal Information in connection with the provision of the services (such as using your contact details to discuss the services) and in accordance with this Policy. In addition, where necessary, we may also share your Personal Information with our institutional investors or other third parties in order to provide our services (e.g. if you or your business provides investor administration services, we may share your business contact details with our investors so that they can contact you.)

If you change your mind about us using your Personal Information in the ways described in this Policy, please let us know by contacting us at GDPRqueries@recordcm.com. You may also opt-out of receiving marketing emails from us by following the instructions outlined in the email.

5. How we share your Personal Information

Where it is necessary for the performance of our contract with an institutional client or investor in which you are affiliated or for our internal business processes, we may share your Personal Information with counterparty banks, certain third parties, such as our professional advisers, service providers, regulatory bodies, auditors, technology providers and any duly authorised agents or related, associated or affiliated companies of the foregoing for the same purposes.

By submitting your Personal Information to us, you acknowledge that such third parties may receive and process your Personal Information. We ask all third parties to treat your Personal Information securely and in accordance with this Policy and will take reasonable steps to enforce this. We will never sell your data.

In addition, it may be necessary to disclose your Personal Information if we are under a duty to disclose your Personal Information in order to comply with any legal obligation (such as anti-money laundering or anti-terrorism financing obligations), carry out an internal investigation, enforce our Terms and Conditions on our Website and any other agreement, or protect the rights, property, or safety of Record, our Funds, our group companies and our clients, directors, employees or other personnel. This includes exchanging information with other companies and organisations for the purposes of fraud protection and prevention.

In exceptional circumstances, if we are sold or merged with another company we may disclose your information to a potential buyer, including your Personal Information and other information concerning your relationship with us so that they can continue to provide the services you have requested.

6. Our security measures and information about when we delete data

We will only retain your Personal Information for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your Personal Information for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for Personal Information, we consider the amount, nature and sensitivity of the Personal Information, the potential risk of harm from unauthorised use or disclosure of your Personal Information, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

Where you have chosen a password which allows you to access certain parts of the Website, such as the section entitled "Client Login" or "Investor Login", you are responsible for keeping this password confidential. We advise you not to share your password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure and, although we will take steps to protect your Personal Information, we cannot guarantee the security of your Personal Information transmitted via the Website; any transmission is therefore at your own risk.

Some of our premises use CCTV for the purpose of crime prevention, however, this is under the control of a third party and therefore you should consult any notices they display and their privacy statements for more information.

7. Transferring Personal Information outside of the UK or EEA

Any Personal Information provided to Record will be transferred to and stored on Record's servers in the UK. We take steps to protect your Personal Information from unauthorised access and against unlawful processing, accidental loss, destruction and damage.

In processing your Personal Information, it will sometimes be necessary for us to transfer your Personal Information outside the UK or European Economic Area ("EEA") to counterparty banks, our staff and our third-party service providers. It may also be accessed by staff operating outside the UK or EEA who work for us or for one of our suppliers or group companies. This includes people engaged in, among other things, the provision of support services to us. We will take all steps reasonably necessary to ensure that your Personal Information is treated securely and in accordance with this Policy and the Data Protection Legislation when it is processed in, or otherwise accessed from, a location outside the UK or EEA. This means that we will only transfer your Personal Information to our non-UK/European offices and Funds and to third parties based outside the UK or EEA if that party (a) is situated in a country that has been confirmed by the UK data protection authorities or (where appropriate) the European Commission to provide adequate protection to Personal Information, (b) has agreed (by way of a written contract incorporating the UK International Data Transfer Agreement or other "model clauses" approved by the UK data protection authorities or the European Commission, or by some other form of approved data transfer mechanism) to provide all protections to your Personal Information as required by the Data Protection

Legislation or (c) we have your explicit consent to do so (such as where you have requested a service from one of our Funds situated outside the UK or EEA).

Where any transfer takes place under a written contract, you have the right to request a copy of that contract and may do so by contacting us at GDPRqueries@recordcm.com.

By submitting your Personal Information to us, you acknowledge this transfer, storing or processing of your Personal Information.

8. Your legal rights

You have a number of rights under data protection laws in relation to your personal data.

You have the right to:

- Request access to your personal data (commonly known as a "subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- Request erasure of your personal data in certain circumstances. This enables you to ask us to delete or remove personal data 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 data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) as the legal basis for that particular use of your data (including carrying out profiling based on our legitimate interests). In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which overrides your right to object. You also have the absolute right to object any time to the processing of your personal data for direct marketing purposes.
- Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- Withdraw consent at any time where we are relying on consent to process your personal. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.
- Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in one of the following scenarios:
 1. If you want us to establish the data's accuracy;
 2. Where our use of the data is unlawful but you do not want us to erase it;
 3. Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or
 4. You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

If you wish to exercise any of the rights set out above please contact us at GDPRqueries@recordfg.com

NO FEE USUALLY REQUIRED

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 could refuse to comply with your request in these circumstances.

WHAT WE MAY NEED FROM YOU

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.

TIME LIMIT TO RESPOND

We try to respond to all legitimate requests within one month. Occasionally it could 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.

9. Complaints

Should you have any queries or complaints in relation to how we use your Personal Information, please contact us at GDPRqueries@recordcm.com. Should you wish to take any complaints or queries further, you have the right to contact the Information Commissioner's Office, the UK regulator for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

Our Website may, from time to time, contain links to and from third-party 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 websites or their related policies. Please check these policies before you submit any Personal Information via these websites.

10. Our use of cookies

A cookie is a small file that is sent to your browser from a web server and is stored on your computer. Cookies help us to analyse web traffic and identify which pages of our Website are being used.

Cookies set by the Website owner (in this case, Record) are called "first party cookies". Cookies set by parties other than the Website owner are called "third party cookies". Third party cookies enable third party features or functionality to be provided on or through the Website (e.g. like advertising, interactive content and analytics). The parties that set these third party cookies can recognise your computer both when it visits the Website in question and also when it visits certain other websites.

Our Website also uses cookies to respond to you as an individual so that it can tailor its operations to your needs by gathering and remembering information about your preferences as well as enabling you to log in to and use the sections entitled "Client Login" and "Investor Login". We only use this information for statistical analysis purposes and then it is removed from our systems.

A cookie in no way gives us access to your computer or any information about you, other than information about how you use the Website and the Personal Information you choose to share with us (including Personal Information you automatically share with us by way of your browser settings).

There are specific types of first and third party cookies served through our Websites.. In particular, we use the following cookies:

(a) Strictly necessary cookies. These cookies are essential in order to enable you to move around the Website and use its features, such as accessing secure areas.

(b) Performance cookies. These cookies collect information about how visitors use our Website, for instance, which pages visitors go to most often and if they get error messages from the web pages. These cookies don't collect information that identifies a visitor; all information these cookies collect is aggregated and therefore anonymous. It is only used to improve how our Website works.

(c) Functionality cookies. These cookies are used to identify unique visitors to Websites. If you log in to the Websites, these are the cookies that allow us to remember who you are and what your preferences are so that we can provide you with access to pages personal to you, for example, your account pages or your selected font size. These cookies can help to keep your visit to the site secure.

(d) Session cookies. These cookies allow us to identify your device as you use the Website, so that you are not treated as a new visitor each time you go to another part of the Website.

(e) Analytics and customisation cookies: These cookies collect information that is used either in aggregate form to help us understand how our Website is being used or how effective our marketing campaigns are, or to help us customise our Website for you.

(f) Social networking cookies: These cookies are used to enable you to share pages and content that you find interesting on our Website through third party social networking and other websites.

We may use banners and pop-ups from time to time to give you options around cookie use. You have the right to decide whether to accept or reject cookies. You can exercise your cookie preferences by clicking on the appropriate opt-out links provided.

You can also manage cookie use via your browser settings (this will allow you to refuse the setting of all or some cookies) and your browser provider may ask you to confirm your settings. If you choose to reject cookies, you may still use our Website though your access to some functionality and areas of our website may be restricted. As the means by which you can refuse cookies through your web browser controls vary from browser-to-browser, you should visit your browser's help menu for more information.

You can find more information about the specific cookies here: www.allaboutcookies.org.

11. Changes to this Privacy and Cookies Policy

Record may amend this Policy at any time without notice. By continuing to use the Website and making use of our services you acknowledge that we shall process your Personal Information in accordance with the updated Policy. If you are not happy with any changes that we make, you should not use or access (or continue to use or access) the Website and/or our services. Any changes to this Policy will be posted on the Website.

12. Our contact information

If you have any questions (including relating to transfers of your Personal Information outside the UK and EEA), please feel free to contact us by email at GDPRqueries@recordfg.com.



Listen
Understand
Deliver

recordfg.com