

Policy information

Platform privacy statement

14 July 2022



1 Introduction

- 1.1 This Privacy Statement sets out how we collect and process your personal data (including any data you may provide through this website, <https://app.treasuryspring.com>) when you engage with us, sign up to our newsletter or invest in any of our products or services.
- 1.2 It is important that you read this privacy policy together with any other privacy policy or fair processing policy we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy policy supplements other notices and privacy policies and is not intended to override them.
- 1.3 This privacy policy is issued by TreasurySpring Management (Jersey) Limited (the “**Manager**”) for and on behalf of itself, TreasurySpring Limited, TreasurySpring Advisors Limited, TreasurySpring Investments (Jersey) ICC, and its other group entities and/or underlying investment vehicles including in connection with the issue of any shares in certain incorporated cells of TreasurySpring Investments (Jersey) ICC, as listed in the schedule to this privacy policy (as updated from time to time) (the “**Cells**”), so that when we mention “TreasurySpring”, “we”, “us” or “our” in this privacy policy, we are referring to the relevant company, entity, Cell etc. in the TreasurySpring group responsible for processing your data.
- 1.4 When you purchase a product or service from us, including investing in one of our fixed-term funds, the Manager will generally be the controller, unless we notify you otherwise. In relation to this website, the Manager is the controller and is responsible for this website on behalf of the TreasurySpring group.
- 1.5 In limited circumstances, certain of our service providers including R&H Fund Services (Jersey) Limited (the “**Administrator**”) and other service providers may also process your personal information when conducting administrative and other activities relating to our products or services. Where they are required to do so in order to comply with their own legal and regulatory obligations, they will do so as data controllers.
- 1.6 We may from time to time publish further privacy notices in connection with specific products and/or investment vehicles which shall complement the provisions of this privacy notice.

2 The personal information we process

- 2.1 The personal information about you that we may process includes: your name, your employer, job title and contact details, date of birth, marital status, tax residence information, payment details for payment details for any dividend and redemption proceeds, KYC/CDD information and any personal information provided in communications or dealings with us.
- 2.2 When you visit our website, we may collect personal data about your use of our systems, including your IP address, login data, browser type, time zone setting, locations, operating systems, username and passwords, usage data, marketing preferences, aggregated data.
- 2.3 We may also collect and process personal data regarding people connected to you, either by way of professional (or other) association or by way of family relationship.
- 2.4 Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

3 Where we obtain your personal information:

- 3.1 We collect your personal information from the following sources:
 - 3.1.1 personal information which you give to us, including but not limited to:
 - (a) information you give to us;
 - (b) such other forms and documents as we may request that are completed in relation to the administration/management of any investment in any relevant Cell;
 - (c) information gathered through client due diligence carried out as part of our compliance with regulatory requirements; or
 - (d) any personal information provided by way of correspondence with us by phone, e-mail or otherwise;
 - 3.1.2 personal information we receive from third party sources, such as:
 - (a) entities in which you or someone connected to you has an interest;
 - (b) your legal and/or financial advisors;
 - (c) other financial institutions who hold and process your personal information;

- and
 - (d) credit reference agencies and financial crime databases for the purposes of complying with our regulatory requirements;
- 3.1.3 personal information received in the course of dealing with advisors, regulators, official authorities and service providers by whom you are employed or engaged or for whom you act; and
- 3.1.4 personal data which we collect as a result of your use of our website:
- (a) we collect information when you complete forms and send us information; and
 - (b) we will usually collect information indirectly by using cookies and other analytical technologies to help us improve your experience – please read our [Cookies Policy](#) to find out more.

4 Why we collect your personal information:

- 4.1 When processing your personal data in relation to the above, we rely on the following lawful grounds and for the following purposes:
- 4.1.1 the processing is necessary to perform a contract we are about to enter into or have entered into with you, for instance, including:
- (a) to provide or register you to receive products or services from us or as a new client;
 - (b) disclosing your personal information to any bank, financial institution or other third party lender providing any form of facility, loan, finance or other form of credit or guarantee;
 - (c) to manage your relationship with us and communicate with you in relation to services we provide you;
- 4.1.2 the processing is necessary for our legitimate interests, provided your interests and fundamental rights do not override those interests, for instance, including:
- (a) operating our website;
 - (b) to carry out statistical analysis or market research;
 - (c) to investigate and respond to complaints and help maintain our service and to train our staff;
 - (d) facilitating the administration of our entities and service providers;
 - (e) monitoring and recording telephone and electronic communications and transactions;

- (i) for quality, business analysis, training and related purposes in order to improve service delivery;
 - (ii) keeping our systems secure; and
 - (ii) for investigation and fraud prevention purposes, for crime detection, prevention, investigation and prosecution of any unlawful act (or omission to act); and
 - (f) to recommend products/services that may be of interest to you;
- 4.1.3 the processing is necessary to comply with our legal and regulatory obligations, for instance, including:
- (a) to comply with our statutory/regulatory and legal requirements;
 - (b) collecting, processing, transferring and storing customer due diligence, source of funds information and verification data under applicable anti-money laundering and terrorist financing laws and regulations;
 - (c) liaising with or reporting to any regulatory authority (including tax authorities) with whom we are either required to cooperate or report to, or with whom we decide or deem it is appropriate to cooperate in relation to an investment; and
 - (d) to help prevent, detect, investigate, and prosecute fraud and/or other criminal activity;
- 4.1.4 the processing is necessary for the purposes of any legal proceedings, obtaining legal advice or establishing, exercising or defending legal rights;
- 4.1.5 (on exceptional occasions) where we have obtained your consent to processing your personal information for a specific purpose; and
- 4.1.6 on rare occasions, where it is needed in the public interest.

5 Sharing personal information

- 5.1 We may share your personal information with our group companies and third parties, including the Administrator, banks, financial institutions or other third party lenders, IT service providers, auditors and legal professionals) to enable us to provide services to you. The group companies and third parties to which your information may be transferred are based in the following jurisdictions: Jersey and United Kingdom.
- 5.2 Where we share your information with a third party, we require the recipients of that personal information to put in place adequate measures to protect it, including by entering into appropriate data transfer agreements such as the EU standard contractual clauses. If you would like further information about the safeguards we have in place to protect your personal information, please contact treasuryspring@rhfsl.com.
- 5.3 Our website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

6 Retention of personal information

- 6.1 Your personal information will be retained for as long as required:
- 6.1.1 for the purposes for which the personal information was collected;
 - 6.1.2 in order to establish or defend legal rights or obligations or to satisfy any reporting or accounting obligations; and/or
 - 6.1.3 as required by data protection laws and any other applicable laws or regulatory requirements.
- 6.2 If you would like further information about our retention policies, please contact treasuryspring@rhfsl.com.

7 Access to and control of personal information

- 7.1 You have the following rights in respect of the personal information about you that we process:
- 7.1.1 the right to access and port personal information;
 - 7.1.2 the right to rectify personal information;
 - 7.1.3 the right to restrict the use of personal information;
 - 7.1.4 the right to request that personal information is erased; and
 - 7.1.5 the right to object to processing of personal information.
- 7.2 You also have the right to lodge a complaint about the processing of your personal information either with us, with the Office of the Information Commissioner in Jersey (<https://jerseyoic.org>) or the data protection authority in the EU member state of your usual residence or place of work or to the Information Commissioner's Office (ICO), 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 any supervisory body, so please contact us in the first instance.
- 7.3 Where we have relied on consent to process your personal information, you have the right to withdraw consent at any time.
- 7.4 If you wish to exercise any of the rights set out in this paragraph 7, please contact treasuryspring@rhfsl.com.

8 Inaccurate or amended information

Please let us know as soon as possible if any of your personal information changes (including your correspondence details).

Questions

If you have any questions about this Privacy Statement or how we handle your personal information (e.g. our retention procedures or the security measures we have in place), or if you would like to make a complaint, please contact treasuryspring@rhfsl.com.

This Privacy Statement is up-to-date as of 14 July 2022 and kept under regular review. It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.



Schedule

The incorporated cells of TreasurySpring Investments (Jersey) ICC as at the date of this Privacy Statement are as follows:

- TreasurySpring Aspen FTF IC
- TreasurySpring Azalea FTF IC
- TreasurySpring Bluebird FTF IC
- TreasurySpring Cassia FTF IC
- TreasurySpring Coral FTF IC
- TreasurySpring CP FTF IC
- TreasurySpring Dahlia FTF IC
- TreasurySpring Equinox FTF IC
- TreasurySpring IG Lending FTF IC
- TreasurySpring IG Lending 2 FTF IC
- TreasurySpring Protea FTF IC
- TreasurySpring Quercia FTF IC
- TreasurySpring Viola FTF IC

Additional incorporated cells of TreasurySpring Investments (Jersey) ICC shall be established by it from time to time and this Privacy Policy will apply to any such newly incorporated cells.



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