



# PRIVACY POLICY

## 1. INTRODUCTION

DYNAM CAPITAL, LTD. respects the privacy of its clients and contacts and visitors to its website and social media platforms.

Dynam Capital, Ltd. is a data controller in relation to any personal data of its clients and contacts and visits to its website and social media platforms. Personal data will be processed by Dynam Capital, Ltd. or on its behalf in compliance with the Data Protection (Bailiwick of Guernsey) Law, 2017 as amended and, to the extent applicable, European data protection legislation including the EU General Data Protection Regulation (Regulation (EU) 2016/679) and any other EU or national legislation which implements or supplements the foregoing.

This Privacy Policy explains how we collect, use, disclose, and safeguard your information. Please read this privacy policy carefully. If you do not agree with the terms of this Privacy Policy, please contact us immediately.

We reserve the right to make changes to this Privacy Policy at any time and for any reason. We will alert you about any changes by updating the “Last Updated” date of this Privacy Policy. Any changes or modifications will be effective immediately upon posting the updated Privacy Policy on our website [www.dynamcapital.com](http://www.dynamcapital.com), and you waive the right to receive specific notice of each such change or modification.

You are encouraged to periodically review this Privacy Policy to stay informed of updates. You will be deemed to have been made aware of, will be subject to, and will be deemed to have accepted the changes in any revised Privacy Policy after the date such revised Privacy Policy is posted.

## 2. COLLECTION OF YOUR INFORMATION

We may collect information about you in a variety of ways:

- If you register online or make an enquiry about any of our products and services;
- You voluntarily complete a customer survey or provide feedback on any of our social-media messages or via email;
- You voluntarily give us information about you during various activities including meetings, exhibitions, workshops etc.;
- Information from third parties, including personal information via social-media networks, such as LinkedIn, Facebook, Instagram, Twitter, or others, or if you provide your information to the third party and grant them permission to access this information.

The data we collect may include:

- Personal data: name, email address, employer, social media ‘handles’, telephone number, age, gender, hometown, interests etc.;
- Information our servers automatically collect when you access our website, such as your IP address, your browser type, your operating system, your access times.

## 3. USE OF YOUR INFORMATION

Having accurate information about you permits us to process your personal data for the following purposes and for the following legal bases:

- Email or contact you directly or indirectly with information about our clients' Funds, research, details on our products and services that you may be interested in (where you have given your consent to such processing or the processing is necessary for our legitimate interests to administer our business);
- Perform other business activities as needed (our legitimate interests to administer our business);
- With your consent, or with an opportunity for you to withdraw consent, we may share your information with third parties for marketing purposes, as permitted by law (where you have given your consent to such processing).

Dynam Capital, Ltd. will only use your personal information for the purposes for which it is collected unless they reasonably consider that they need to use it for another reason and that reason is compatible with the original purpose. If they need to use individual's data for an unrelated purpose, they will notify the individual and explain the legal basis which allows them to do so. Please note that Dynam Capital, Ltd. may process an individual's data without the knowledge or consent of the individual, where these are required or permitted by law.

To the extent that such personal data contains "special category data" such as, for example: data relating to racial or ethnic origin, political opinion, religious or philosophical belief, trade union membership or criminal data, then the processing of such data shall solely be for the purpose of complying with any duty imposed on us by an enactment.

#### **4. SECURITY OF YOUR INFORMATION**

We use administrative, technical, and physical security measures to help protect your personal information. While we have taken reasonable steps to secure the personal information you provide to us, please be aware that despite our efforts, no security measures are perfect or impenetrable, and no method of data transmission can be guaranteed against any interception or other type of misuse. Any information disclosed online is vulnerable to interception and misuse by unauthorized parties. Therefore, we cannot guarantee complete security if you provide personal information.

#### **5. SHARING PERSONAL DATA**

Dynam Capital, Ltd. may share your personal data with group companies and third parties (including bank, financial institution or other third-party lenders, IT service providers, auditors and legal professionals) under the terms of any appropriate delegation or contractual arrangement.

#### **6. OPTIONS REGARDING YOUR INFORMATION**

We would like to make sure you are fully aware of all of your data protection rights:

- **The right to access and port:** You have the right to request access to the personal data and to request that it be transmitted to another controller.
- **The right to object to processing:** You have the right to object to processing where personal data is processed for direct marketing purposes.
- **The right to rectification:** You have the right to request that we correct any information you believe is inaccurate. You also have the right to request that we to complete information you believe is incomplete.

- **The right to erasure:** You have the right to request that we erase your personal data under certain conditions.
- **The right to restrict processing:** You have the right to request that we restrict the processing of your personal data, under certain conditions.
- **Where we rely on consent to process the personal data, the right to withdraw consent at any time by contacting us via the contact details below.**

If you no longer wish to receive correspondence, emails, or other communications from us, you may opt-out by contacting us using the contact information provided below.

Further, you have the right to ask questions or complain about how Dynam Capital, Ltd. processes your personal data, including the right to complain to the relevant data protection regulator (The Data Protection Commissioner, at the Office of the Data Protection Authority, St Martin's House, Le Bordage, St Peter Port, Guernsey GY1 1BR).

## **7. RETENTION OF PERSONAL DATA**

Your personal data will be retained for the longest of the following periods:

- for us to carry out the purposes for which the data was collected;
- in order to establish or defend legal rights or obligations or to satisfy any reporting or accounting obligations; and/or
- any retention period that is required by data protection laws and any applicable laws or regulatory requirements.

## **8. PRIVACY POLICIES OF OTHER WEBSITES**

Our websites contain links to other websites. Our privacy policy applies only to our website, so if you click on a link to another website, you should read their privacy policy.

## **9. CHANGES TO OUR PRIVACY POLICY**

Dynam Capital, Ltd. keeps its privacy under regular review and places any update on its website. This Privacy Policy was last updated on June 2020.

## **10. CONTACT US**

If you have questions or comments about this Privacy Policy, the data we hold on you, or you would like to exercise one of your protection rights, please do not hesitate to contact us at:

DYNAM CAPITAL, LTD.

De Catapan House, Grange Road, St Peter Port, Guernsey, GY1 2QG

Email: [info@dynamcapital.com](mailto:info@dynamcapital.com)

Website: [www.dynamcapital.com](http://www.dynamcapital.com)