

IMPORTANT INFORMATION
MARKETING PRIVACY NOTICE

Marketing Privacy Notice

This Privacy Notice describes how SEI Investments (Europe) Limited collects, uses and shares the information you provide to us and the information we collect in the course of operating our business and our websites.

In this Privacy Notice when we refer to SEI Investments (Europe) Limited or “we”/“us”/“our” we mean SEI Investments (Europe) Limited and also other companies and entities that are associated with us. You can find contact details for our other locations in the Contact Us section of our website.

We may revise this Privacy Notice at any time by amending this page. You are expected to check this page from time to time to take notice of any changes we make, as they are binding on you.

- This Privacy Notice describes:
- The information that we collect and where we get it from
- How we use the information we collect
- How we share information with third parties
- Keeping your information and information security
- Your choices and rights
- Cookies

THE INFORMATION THAT WE COLLECT AND WHERE WE GET IT FROM

“Personal information” is any information that can be used to identify you or that we can link to you and which we have in our possession or control. We will collect and process the personal information that you provide to us, including when you email us or contact us through various channels as follows:

- When you sign up for newsletters, webinars, events or obtain services from us or when you contact us with queries or respond to our communications the personal information you provide may include your full name, title, telephone number, email address and content, date and time of your email correspondence and information about your employer or your business.
- If you are a client of SEI Investments (Europe) Limited you will provide us with personal information when you or the company you represent becomes a client. If you are not a client we may collect or receive your personal information because you are involved in one of our client’s matters.
- We use various technologies to collect and store information when you visit our websites. We may, for example, collect information about the type of device you use to access the websites, your IP address and your geographic location, the operating system and version, your browser type, the content you view and features you access on our websites, the web pages and the search terms you enter on our websites. For information about how we use Cookies and the choices you may have, please see our Cookies Privacy Notice.

INFORMATION WE OBTAIN FROM OTHER SOURCES

- If we collect or receive your personal information in the context of our provision of services we might receive information from third parties such as your employer, other parties relevant to the services we are providing (e.g. counterparties in transactions) and others such as regulators and authorities. That information could include your name, contact details, employment details and other information relevant to the services that we are providing to our client.

HOW WE USE THE INFORMATION WE COLLECT

We may do the following with your personal information:

- Use it to provide services to the relevant client
- Use it to engage in marketing and business development activity in relation to our services. This may include sending you newsletters, updates, marketing communications and other information that may be of interest to you
- To comply with and regulatory obligations that we have to discharge
- Use it to establish, exercise or defend our rights or for the purpose of legal proceedings
- Record and monitor your use of our websites or our other online services for our business purposes which may include analysis of usage, measurement of site performance and generation of marketing reports
- Use it for our legitimate business interests, such as undertaking business research and analysis, managing the operation of our websites and our business
- Use it to look into any complaints or queries you may have, and
- Use it to prevent and respond to actual or potential fraud or illegal activities.

Also, we may collate, process and share any statistics based on an aggregation of information held by us provided that any individual is not identified from the resulting analysis and the collation, processing and dissemination of such information is permitted by law.

GROUNDS FOR USING YOUR PERSONAL INFORMATION

We rely on the following grounds to process your personal information, namely:

- **Consent** - we may (but usually do not) need your consent to use your personal information. You can withdraw your consent by contacting us (see below).
- **Performance of a contract** - we may need to collect and use your personal information to enter into a contract with you or to perform our obligations under a contract with you.
- **Legitimate interest** - we may use your personal information for our legitimate interests, some examples of which are given above.
- **Compliance with law or regulation** - we may use your personal information as necessary to comply with applicable law/regulation.

HOW WE SHARE INFORMATION WITH THIRD PARTIES

We share personal information with our international offices and the various companies and entities that make up our international network. As a result, your personal information may be transferred to locations outside Europe as well as within it for the purposes described above.

We may also share your personal information outside SEI. This may include:

- Third party agents/suppliers or contractors, bound by obligations of confidentiality, in connection with the processing of your personal information for the purposes described in this Privacy Notice.
- Third parties relevant to the services that we provide. This may include, but is not limited to, counterparties to transactions, other professional service providers, regulators, authorities, governmental institutions and stock exchanges.
- To the extent required by law, regulation or court order, for example, if we are under a duty to disclose your personal information in order to comply with any obligation.

Where we transfer your personal information outside Europe, we will ensure that it is protected and transferred in a manner consistent with requirements applicable to the information. This can be done in a number of different ways, for instance:

- The country to which we send the personal information may be approved by the European Commission
- The recipient may have signed a contract based on “model contractual clauses” approved by the European Commission, obliging them to protect your personal information, or
- Where the recipient is located in the US, it may be a certified member of the EU-US Privacy Shield scheme.

In other circumstances, the law may permit us to otherwise transfer your personal information outside Europe. In all cases, however, any transfer of your personal information will be compliant with applicable data protection law.

KEEPING YOUR INFORMATION AND INFORMATION SECURITY

How long we hold your personal information for will vary and will depend principally on:

- The purpose for which we are using your personal information - we will need to keep the information for as long as is necessary for the relevant purpose, and
- Obligations - laws or regulation may set a minimum period for which we have to keep your personal information.

We will ensure that the personal information that we hold is subject to appropriate security measures.

YOUR CHOICES AND RIGHTS

You have a number of rights in relation to the personal information that we hold about you and you can exercise your rights by contacting us using the details set out below. These rights include:

- Obtaining information regarding the processing of your personal information and access to the personal information which we hold about you. Please note that there may be circumstances in which we are entitled to refuse requests for access to copies of personal information.
- Requesting that we correct your personal information if it is inaccurate or incomplete.
- Requesting that we erase your personal information in certain circumstances. Please note that there may be circumstances where you ask us to erase your personal information but we are legally entitled to retain it.
- Objecting to, and requesting that we restrict, our processing of your personal information in certain circumstances. Again, there may be circumstances where you object to, or ask us to restrict, our processing of your personal information but we are legally entitled to refuse that request.
- In some circumstances, receiving some personal information in a structured, commonly used and machine-readable format and/or requesting that we transmit those information to a third party where this is technically feasible. Please note that this right only applies to personal information which you have provided to us.
- Withdrawing your consent, although in certain circumstances it may be lawful for us to continue processing without your consent if we have another legitimate reason (other than consent) for doing so.
- Lodging a complaint with the relevant data protection authority, if you think that any of your rights have been infringed by us.
- We can, on request, tell you which data protection authority is relevant to the processing of your personal information.

COOKIES

Visit seic.com/en-gb/privacy-policy for information on our Cookie Privacy Notice.

CONTACT US

If you would like further information on the collection, use, disclosure, transfer or processing of your personal information or the exercise of any of the rights listed above, please contact us. You can do this by writing to our Data Protection Officer at:

SEI Investments (Europe) Limited

1st Floor Alphabeta,

14-18 Finsbury Square

London EC2A 1BR

Phone: +44 (0)20 3810 8000

Email: DataProtectionOfficer@seic.com

Alternatively, if you are a resident in the European Union ("EU"), please contact our EU Representative, SEI Investments – Global Fund Services Limited, by email at the following address: Art27rep@seic.com

As we do not have an establishment in the EU, we have appointed a representative, based in Ireland, in accordance with Regulation (EU) 2016/679 ('the GDPR') Article 27, where EU residents may address any issues or queries relating to our processing of your Personal Data to.

SEI New ways.
New answers.®