

## PRIVACY POLICY

We take your privacy very seriously. Please read this privacy policy carefully as it contains important information on who we are and how and why we collect, store, use and share Personal Data relating to you or that of your directors, officers, employees and / or beneficial owners ("Personal Data"). It also explains your rights in relation to your Personal Data and how to contact us or supervisory authorities in the event you have a complaint.

We collect, use and are responsible for certain Personal Data about you. When we do so we are subject to the EU General Data Protection Regulation (Regulation 2016/679) ("GDPR") and we are responsible as 'controller' of that Personal Data for the purposes of those laws.

### 1. KEY TERMS

It would be helpful to start by explaining some key terms used in this policy:

We, us, our	means the investment manager to the Fund, Highlight Investment Management LLP.
Fund	means VT Highlight British Companies Fund.
ACD	means the Authorised Corporate Director for the Fund, Valu-Trac Limited.
Investment Manager	means the investment manager to the Fund, Highlight Investment Management LLP.
Personal Data	means any information relating to an identified or identifiable individual.

### 2. PERSONAL DATA WE COLLECT ABOUT YOU

We may collect and use the following Personal Data about you:

- your name and contact information, including email address and telephone number, residential address and mailing address if different;
- information about how you use our website

This Personal Data is required to enable us to provide you with information that you have requested. Your contact information is also used by the Investment Manager to enable it to provide investors with regular updates on the performance of the Fund if they request this.

### 3. HOW YOUR PERSONAL DATA IS COLLECTED

We collect most of this Personal Data directly from you. If you are a potential investor into the Fund and have contacted the Investment Manager, we are able to provide you with limited material in respect of the Fund, including the Key Investor Information Document and the prospectus of VT Highlight ICVC of which VT Highlight British Companies Fund is a sub-fund.

We may also collect Personal Data from cookies on the website of the Investment Manager—for more information on our use of cookies, please see our cookies policy.

#### **4. HOW AND WHY WE USE YOUR PERSONAL DATA**

Under data protection law, we can only use your Personal Data if we have a proper reason for doing so. In order to use your Personal Data, we rely on the following legal bases:

- (i) processing is necessary for us to enable your investment in the Fund;
- (ii) processing is necessary to comply with our legal obligations; and
- (iii) processing is necessary for the purposes of legitimate business interests pursued by us.

We collect and process your Personal Data in order to:

- prevent unauthorised access and modification to our systems; and
- provide updates on the performance of an investment in the Fund, in the form of quarterly factsheets.

#### **5. WHO WE SHARE YOUR PERSONAL DATA WITH**

We routinely share Personal Data with:

- third parties we use to help deliver investment services to you, e.g. the Fund Administrator

We only allow our service providers to handle your Personal Data if we are satisfied they take appropriate measures to protect your Personal Data. We also impose contractual obligations on service providers relating to ensure they can only use your Personal Data to provide services to us and to you. We may also share Personal Data with external auditors, eg in relation to audit of our accounts.

We may disclose and exchange information with law enforcement agencies and regulatory bodies to comply with our legal and regulatory obligations.

We may also need to share some Personal Data with other parties, such as potential buyers of some or all of our business or during a re-structuring. Usually, information will be anonymised but this may not always be possible. The recipient of the information will be bound by confidentiality obligations.

We will not share your Personal Data with any other third party.

#### **6. HOW LONG YOUR PERSONAL DATA WILL BE KEPT**

We will keep your Personal Data for as long as is necessary to provide the information that you have requested.

We will not retain your Personal Data for longer than necessary for the purposes set out in this policy. Different retention periods apply for different types of Personal Data.

When it is no longer necessary to retain your Personal Data, we will delete it.

## 7. TRANSFERRING YOUR PERSONAL DATA OUT OF THE EEA

To deliver services to you, it is sometimes necessary for us to share your Personal Data outside the European Economic Area (EEA), for example:

- with our service providers who may be required by law to report to regulatory authorities outside the EEA; or
- if you are based outside the EEA;

These transfers are subject to special rules under European and UK data protection law.

Not all non-EEA countries have the same data protection laws as the United Kingdom and EEA. Any transfer of personal data by us or any of our duly authorised delegates outside the EEA shall be subject to appropriate safeguards being in place in accordance with the conditions in the Data Protection Legislation. Please contact us if you wish to obtain more information on the appropriate safeguards. See **'How to contact us'** below.

## 8. YOUR RIGHTS

You have the following rights, which you can exercise free of charge:

Access	The right to be provided with a copy of your Personal Data (the right of access)
Rectification	The right to require us to correct any mistakes in your Personal Data
To be forgotten	The right to require us to delete your Personal Data—in certain situations
Restriction of processing	The right to require us to restrict processing of your Personal Data—in certain circumstances, e.g. if you contest the accuracy of the data
Data portability	The right to receive the Personal Data you provided to us, in a structured, commonly used and machine-readable format and/or transmit that data to a third party—in certain situations
To object	The right to object: —at any time to your Personal Data being processed for direct marketing (including profiling); —in certain other situations to our continued processing of your Personal Data, e.g. processing carried out for the purpose of our legitimate interests

Not to be subject to automated individual decision-making	The right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you
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For further information on each of those rights, including the circumstances in which they apply, please contact us or see the [Guidance from the UK Information Commissioner’s Office \(ICO\) on individuals’ rights under the General Data Protection Regulation](#).

If you would like to exercise any of those rights, please email, call or write to us — see below: ‘**How to contact us**’; and

- let us have enough information to identify you (e.g. your full name and address);
- let us have proof of your identity and address (a copy of your driving licence or passport and a recent utility or credit card bill); and
- let us know what right you want to exercise and the information to which your request relates.

## 9. KEEPING YOUR PERSONAL DATA SECURE

We have appropriate security measures to prevent Personal Data from being accidentally lost or used or accessed unlawfully. We limit access to your Personal Data to those who have a genuine business need to access it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

If you want detailed information from Get Safe Online on how to protect your information and your computers and devices against fraud, identity theft, viruses and many other online problems, please visit [www.getsafeonline.org](http://www.getsafeonline.org). Get Safe Online is supported by HM Government and leading businesses.

## 10. HOW TO COMPLAIN

We hope that we can resolve any query or concern you may raise about our use of your information.

The General Data Protection Regulation also gives you right to lodge a complaint with a supervisory authority, in particular in the European Union (or EEA) state where you work, normally live or where any alleged infringement of data protection laws occurred. The supervisory authority in the UK is the Information Commissioner who may be contacted at <https://ico.org.uk/concerns> or telephone: 0303 123 1113.

## 11. CHANGES TO THIS PRIVACY POLICY

This privacy notice was published in July 2024.

We may change this privacy notice from time to time.

## 12. HOW TO CONTACT US

Please contact us by post, email or telephone if you have any questions about this privacy policy or the information we hold about you.

Our contact details are shown below:

<b>Our contact details</b>
<p>c/o Highlight Investment Management LLP <a href="mailto:info@highlightim.com">info@highlightim.com</a></p> <p>You can also write to us at:</p> <p>Highlight Investment Management LLP 95a George Street Edinburgh EH2 3ES</p> <p>or call us on 0131 603 8210</p> <p>Note that telephone calls to Highlight Investment Management LLP may be recorded.</p>