

# CQS (UK) LLP Privacy Notice

## Business Contacts and Website users

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This privacy notice (**Notice**) explains how CQS (UK) LLP, trading as Manulife | CQS Investment Management (**Manulife CQS, we, our, us**) processes your personal data, and your rights in relation to the personal data we hold.

This Notice concerns our processing of personal data of Manulife CQS' general business contacts, users of our website and individuals connected to assets managed by Manulife CQS (**you, your**). We also provide separate privacy notices (**Specific Notices**) to staff and job applicants, investors (and their representatives/agents) in funds managed or advised by Manulife CQS, and certain other individuals.

Manulife CQS is the data controller of your personal data and is subject to the Data Protection Act 2018 and the UK GDPR (together the "**DPA**").

This Notice is effective from May 2025 and supersedes any previous privacy notice or similar terms provided by us to you unless you have been provided with a Specific Notice that is relevant to your relationship with us (in which case the Specific Notice takes precedence).

## Your Rights

You have certain rights under the DPA including the right to:

1. obtain access to, and copies of, the personal data that we hold about you;
2. require that we cease processing your personal data;
3. require us to erase your personal data;
4. require us to restrict our data processing activities in relation to your personal data;
5. receive from us the personal data we hold about you, which you have provided to us, in a reasonable format specified by you, including for the purpose of you transmitting that personal data to another data controller; and
6. require us to correct the personal data we hold about you if it is incorrect or incomplete.

Please note that the above rights are not absolute, and requests may be refused where exceptions apply.

If you have any queries about these rights or how your personal data is used by us, you should contact the Client Service Department of Manulife CQS using the details below:

**Address:** CQS (UK) LLP, 4th Floor, One Strand, London, WC2N 5HR

**Attention:** Client Services

**Email:** CQSClientService@cqsm.com

**Tel:** +44 20 7201 6900

If you are not satisfied with how your personal data is used by us you can make a complaint to the Information Commissioner ([www.ico.org.uk](http://www.ico.org.uk)).

## How Your Personal Data is Collected

We will collect your personal data in a number of ways, for example:

- from the information you provide to us in meetings, correspondence or other communications with us;
- from third parties, for example broker/dealers, your agents, or our distribution agents;
- from publicly available sources;
- from your computer and software when you view our website.

## The Categories of Personal Data Collected

In the ways explained above, we may collect the following types of personal data about you:

- contact and communications information, including:
  - your contact details, including email address(es), telephone numbers and postal address(es);
  - records of communications and interactions we have had with you;
  - information provided by your computer and software when you visit our website, for example your IP address, browser and operating system information (note that we do not attempt to identify individuals using this information);
- identification, biographical, educational and social information, including, for example:
  - your name, title, gender, nationality and age;
  - your image and likeness (for example if we are meeting you in person);
  - your signature (for example when signing a contract or other document provided to us);
  - your activities, lifestyle information and social circumstances;
- work related information, including:
  - your professional activities and interests;
  - your involvement with and membership of industry bodies and professional associations;
  - other information about your employment and professional life;
  - the reasons you provide to us for requesting a login to our website, if applicable; and
  - other information which you provide in your communications with us.

## Why and How We Process Your Personal Data and with Whom it is Shared

### Legitimate Interests

We process your personal data because it is necessary for our or a third party's legitimate interests. Our "legitimate interests" include our commercial interests in operating our business in a professional, sustainable manner, in accordance with all relevant legal and regulatory requirements. In this respect, we use your personal data for the following:

- providing you with information about us;
- marketing to you (see the separate section on Marketing below);
- monitoring and recording telephone calls and emails and internet use in accordance with our IT policies;
- performing our role as an investment manager or investment adviser;
- when seeking advice on our rights and obligations, such as where legal advice is required.

In this respect your personal data may be shared with the following:

- other entities within our corporate group (Other Manulife CQS Entities), and investment funds (Funds) managed or advised by us or by Other Manulife CQS Entities; and
- our professional advisers (such as lawyers or accountants) where it is necessary to obtain their advice or assistance.

### Legal Obligations

We also process your personal data for our compliance with our legal or regulatory obligations. In this respect, we use your personal data for the following:

- to meet our compliance and regulatory obligations, such as compliance with anti-money laundering laws and the rules relating to the marketing of our Funds and services;
- monitoring and recording telephone calls and emails for compliance with our regulatory obligations;
- for the prevention and detection of crime, and in order to assist with investigations (including criminal investigations) carried out by the police and other competent authorities, such as the FCA.

### Marketing

We may send you information about potential investments, opinion pieces, and invitations to events.

If you object to receiving marketing at any time, you should contact us using the details above.

We may share your personal data with Funds and with third parties such as financial institutions who provide marketing services to us and with which we have marketing agreements in place.

We may also share your personal data with Other Manulife CQS Entities in order to coordinate marketing efforts between territories and prevent duplication of marketing.

If you object to us sharing your data in this way, you should contact us using the details above.

### International Transfers of Data

When sharing your personal data with third parties as set out in this Privacy Notice, some of those third parties may be located outside the UK. In these circumstances, your personal data will only be transferred on one of the following bases:

- the transfer is to a recipient in a country or territory subject to UK adequacy regulations in accordance with the DPA;
- the transfer is to a recipient that has entered into UK standard contractual clauses with us; or
- you have explicitly consented to the transfer.

If you wish to find out more about the transfer by us of your data outside the UK, then please contact us using the contact details above.

### Retention of Your Data

We will retain your personal data for as long as there is a business relationship between you and us.

After that time, other than your basic business contact information, we will retain your personal data only as long as it is required in order to satisfy our legal obligations.