

EDGBASTON INVESTMENT PARTNERS
PRIVACY POLICY

Edgbaston Investment Partners LLP and Edgbaston Partners Limited (hereafter, referred to collectively as “Edgbaston”, “we”, “us” or “our”) are committed to maintaining the confidentiality, integrity, and security of individuals whose data they process (unless otherwise stated, hereafter, referred to collectively as “you” or “yours”).

This policy sets out the means by which Edgbaston collects, uses and shares the personal data of its varying data subjects:

- (a) as processor on behalf of the Edgbaston Asian Equity (Jersey) Trust;
- (b) as controller in connection with the Edgbaston Asian Equity Trust ((a) and (b) are collectively referred to as the “Funds”);
- (c) through the use of its website (www.edgbastonip.com);
- (d) in applying for employment with Edgbaston;
- (e) through correspondence; and/or,
- (f) in its use of products and/or services.

It outlines your data protection rights under the UK GDPR (being the General Data Protection Regulation, Regulation (EU) 2016/679, as it forms part of UK domestic law by virtue of section 3 of the European Union (Withdrawal) Act 2018 including as further amended or modified) and EU data protection regime introduced by the General Data Protection Regulation (Regulation 2016/679) (“GDPR”). For California residents, this policy also outlines your data protection rights in accordance with the California Consumer Privacy Act (“CCPA”) and the California Privacy Rights Act (“CPRA”). If you provide Edgbaston with personal data about other individuals (including your representatives, agents, trustees and/or beneficiaries) you agree to provide each individual, whose data you provide to Edgbaston, with a copy of this Policy.

This website is not intended for children and we do not knowingly collect data relating to children throughout this website. Children should not access or use our website.

Categories of Data Subjects

A. Unitholders

The following section of this policy sets out how Edgbaston, as processor or controller of the Funds that it manages, will process personal data. References to “we”, “us” or “our” in this section, are referring to Edgbaston and the Funds. References to “you”, “your(s)” or “Unitholders” in this section, are referring to investors in the Funds.

The kind of information we hold about you

We may hold personal data about Unitholders, and prospective Unitholders (and / or your representatives, trustees and / or beneficiaries), which is provided to us by you directly as a result of your investment, or potential investment, in the Funds (by completing subscription forms, telephone calls and/or corresponding with us, for example) or which is provided to us by third parties.

We have grouped together the various types of data we may hold about you as follows:

- *Identity data*: may include names, titles, date of birth and pronoun preferences and personal identifiers such as your tax identification number;
- *Contact data*: may include addresses, telephone numbers and email addresses;
- *KYC data*: may include copies of identification documents such as passports and/or driving licences and utility bills;
- *Financial data*: may include the existence of and details of your units in the Funds and bank account details; and
- *Correspondence data*: may include any other data which you provide to us in correspondence, telephone calls and/or documents.

The actual data we hold will be dependent on the structure, regulatory status and / or tax status of the particular Fund in which Unitholders are invested. We may be required to process personal data relating to persons connected with you, including the name, contract details and signature of authorised signatories.

We do not knowingly collect any sensitive personal data or special categories of personal data about you in your capacity as a unitholder or a potential unitholder of the Funds (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data), nor do we knowingly collect any information about criminal convictions and offences.

How we will use the information about you and the basis on which we process your data

Your personal data may be processed by Edgbaston or its sub-processors (or any of their affiliates, agents, employees, delegates or sub-contractors) for the purposes detailed in the table below. Details of the legal basis relied upon to process your personal data is also included in this table.

Purpose / Activity	Type of Data	Legal Basis for Processing
Communicating information about investment products, including to provide you with information on Edgbaston and the Funds.	Identity, contact	Our legitimate interests of pursuing and developing our business and communicating with Unitholders
To allow us to administer and manage your holdings in the Funds.	Identity, contact, financial, KYC, correspondence	a) Performance of a contract to which you are a party or in order to take steps at your request prior to entering into such a contract b) Compliance with our legal and regulatory obligations c) Our legitimate interests of pursuing and developing our business

Purpose / Activity	Type of Data	Legal Basis for Processing
To update and maintain records for the Funds with regulators and service providers, including maintaining statutory registers.	Identity, contact, KYC, financial, correspondence	<ul style="list-style-type: none"> a) Compliance with our legal and regulatory obligations b) Our legitimate interests of ensuring effective and accurate record keeping
To carry out anti-money laundering checks and other actions in an attempt to detect, prevent, investigate and prosecute fraud and crime, which Edgbaston considers necessary for compliance with its or the Funds' legal obligations, for the performance of a task being carried out in the public interest and/or to pursue Edgbaston's or the Funds' legitimate interests (including for the prevention of fraud, money laundering, sanctions, terrorist financing, bribery, corruption and tax evasion).	Identity, contact, KYC, financial, correspondence	<ul style="list-style-type: none"> a) Performance of a contract to which you are a party or in order to take steps at your request prior to entering into such a contract b) Compliance with our legal and regulatory obligations c) Our legitimate interests of the prevention of fraud, money laundering, sanctions, terrorist financing, bribery, corruption and tax evasion
To prepare tax related information and to comply with legal, tax or regulatory obligations.	Identity, contact, KYC, financial, correspondence	<ul style="list-style-type: none"> a) Compliance with our legal and regulatory obligations
To (i) process and verify instructions, (ii) investigate and prevent fraud, (iii) detect, prevent, investigate and prosecute crime, (iv) enforce or defend our rights or responsibilities	Identity, contact, KYC, financial, correspondence data	<ul style="list-style-type: none"> a) in order to comply with any legal, regulatory or tax obligation b) to pursue our legitimate interests, of lawfully conducting our business
To scan and monitor emails sent to us (including attachments) for viruses or malicious software, to process and encrypt personal data to protect and manage email traffic, and to store personal data on our systems.	Identity, contact, correspondence	<ul style="list-style-type: none"> a) Our legitimate interests of document retention and IT security b) Compliance with our legal and regulatory obligations (including under data protection law)

Purpose / Activity	Type of Data	Legal Basis for Processing
Such other actions as are necessary to manage the activities and/or to comply with the legal obligations of the Funds and Edgbaston, including by processing instructions, monitoring and recording electronic communications (including telephone calls and emails) and enforcing or defending the rights and/or interests of the Funds or Edgbaston.	Identity, contact, KYC, financial, correspondence	<p>a) Compliance with our legal and regulatory obligations (including under data protection law)</p> <p>b) Our legitimate interests of pursuing and developing our business and monitoring email traffic</p> <p>c) Performance of a contract to which you are a party or in order to take steps at your request prior to entering into such a contract</p>

Where processing is being carried out on the basis that it is necessary for the pursuit of Edgbaston's or a third party's legitimate interests, we will only carry out such processing if such legitimate interests are not overridden by your interests, fundamental rights or freedoms. Edgbaston and/or the Funds do not anticipate being required to obtain your consent for the processing of your personal data. If Edgbaston and/or the Funds wish to use your personal data for other purposes which do require your consent, Edgbaston will contact you to request this.

Where we need to collect personal data by law or under the terms of a contract to which you are a party and you fail to provide that data when requested, we may not be able to perform the contract or enter a contract with you (and accordingly may be unable to register you as a Unitholder, or, if you are a current Unitholder, allow you to exercise all of your rights in connection with your investment). We will notify you if this is the case.

B. Job Applicants

The following section of this policy sets out how Edgbaston may process personal data (to the extent that Edgbaston is a data controller of the personal data that you provide) relating to applications for jobs or placements, and in relation to potential workers and contractors. Edgbaston is the data controller of the personal data that you provide or which is provided to or collected by Edgbaston during and/or in connection with any application for a position at Edgbaston.

The kind of information we hold about you

In connection with an application, we may collect, store, and use the following categories of personal data about you, which we have grouped together as follows:

- *Identity data*: may include your name, marital status, date of birth and gender;
- *Contact data*: may include address and post code, telephone number and personal email address;
- *Right to work data*: may include proof of identification (includes copies of passport photo page and utility bills) and residency status; and
- *Career data*: may include employment history, qualifications and other information contained in your CV and cover letter or email, information obtained from social media, including LinkedIn, details

of referees and references, qualifications (including copy certificates of academic and professional qualifications), screening questionnaires for verification by an outsourced firm with a summary of findings, and information provided to us during telephone calls, interviews and/or meetings with you.

How we collect your data

We may collect personal data about candidates from the following sources: you, the candidate directly; recruitment agencies; background check providers; credit reference agencies; disclosure and barring services in respect of criminal convictions; your named referees; and data from third parties if from a publicly accessible source including Companies House records and social media (such as LinkedIn).

How we will use the information about you and the basis on which we process your data

Your personal data may be processed by Edgbaston or its sub-processors (or any of their affiliates, agents, employees, delegates or sub-contractors) for the purposes detailed in the table below. Details of the legal basis relied upon to process your personal data is also included in this table.

Purpose / Activity	Type of Data	Legal Basis for Processing
To assess your skills and qualifications, to consider your suitability for the position and to decide whether to enter into a contract with you.	Identity, right to work, career	a) Performance of (or taking steps prior to entering into) a contract b) Our legitimate interests of conducting a recruitment process and assessing your suitability for a role
To carry out background and reference checks, where applicable.	Identity, right to work	a) Compliance with our legal and regulatory obligations b) Our legitimate interests of conducting a recruitment process and assessing your suitability for a role
To communicate with you about the recruitment process.	Contact	a) Performance of (or taking steps prior to entering into) a contract b) Our legitimate interests of conducting a recruitment process
To keep records related to our hiring processes.	Identity, contact, right to work, career	a) Compliance with our legal and regulatory obligations, including under data protection laws b) Our legitimate interests of ensuring effective document management and retention, and defending ourselves against potential legal claims

Purpose / Activity	Type of Data	Legal Basis for Processing
To comply with legal or regulatory requirements.	Identity, contact, right to work, career	a) Compliance with our legal and regulatory obligations
To scan emails sent to us (including attachments) for viruses or malicious software, to process and encrypt personal data to protect and manage email traffic and to store personal data on our systems.	Identity, technical, contact	a) Our legitimate interests including for document management and retention purposes b) Compliance with our legal and regulatory obligations (including under data protection laws)
Such other actions as are reasonably necessary to manage our activities, including by processing instructions, monitoring and recording electronic communications (including telephone calls and emails), for regulatory purposes, enforcing or defending Edgbaston's rights and interests.	Identity, contact	a) Compliance with our legal and regulatory obligations (including under data protection law) b) Our legitimate interests of pursuing and developing our business, training our staff, documenting communications and monitoring email traffic

As noted above, we process personal data on the basis of our legitimate interests (including in order to decide whether to appoint you to work for us), to take steps prior to entering into a contract with you (or to perform said contract) and/or in order to comply with applicable laws. Once we receive your CV and/or covering letter, we may process that information to decide whether Edgbaston has any suitable vacancies and, if you meet the basic requirements, to be shortlisted for that role. If you do, we will decide whether your application is strong enough to invite you for an interview. If we decide to call you for an interview, we will use the information you provide to us at the interview to decide whether to offer you the work. If we decide to offer you the work, we will then take up references and we may carry out a criminal record or other checks before confirming your appointment.

If you fail to provide information when requested which is necessary for us to consider your application (such as evidence of qualifications or work history), we will not be able to process your application. For example, if we require a credit check or references for the role and you fail to provide us with relevant details, we will not be able to take your application further. You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making. We may share your personal data with employee screening and IT service providers for the purposes of processing your application.

Where processing is being carried out on the basis that it is necessary for the pursuit of Edgbaston's or a third party's legitimate interests, we will only carry out such processing if such legitimate interests are not overridden by your interests, fundamental rights or freedoms. Edgbaston and/or the Funds do not anticipate being required to obtain your consent for the processing of your personal data. If Edgbaston and/or the Funds wish to use your personal data for other purposes which do require your consent, Edgbaston will contact you to request this.

C. Edgbaston Website Users

The following section of this policy sets out how Edgbaston may process personal data (as a controller) relating to visitors to its website.

The kind of information we hold about you

Our website uses cookies as set out in our Cookies Policy (available in the Appendix), including essential and non-essential cookies (such as Google Analytics) which collect and process personal data (including IP addresses) to gain insights, including measuring users' engagement and site statistics and to improve the design and functionality of our website.

Personal data may also be collected about you from direct interactions with you, including by filling in forms and any email or other correspondence. This includes personal data you provide when you request information to be sent to you.

We have grouped together the various types of data we may hold about you as follows:

- *Identity data*: may include your name and title;
- *Contact data*: may include addresses, telephone numbers and personal and work email addresses;
- *Technical data*: may include IP addresses, your login data, browser type and version, time zone setting and location, internet server provider's domain name, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website;
- *Marketing preference data*: may include details of whether you have opted in or opted out of receiving marketing, and details of the types of marketing you wish to receive;
- *Usage data*: includes information about how you use our website, products or services, including data collected from our use of cookies; and
- *User type data*: includes information relating to the type of website user you are (for example, institutional investor, or private investor).

We do not knowingly collect any sensitive personal data or special categories of personal data about you through our website (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we knowingly collect any information about criminal convictions and offences through our website.

How we will use information about you and the basis on which we process your data

Your personal data may be processed by Edgbaston or its sub-processors (or any of their affiliates, agents, employees, delegates or sub-contractors) for the purposes detailed in the table below. Details of the legal basis relied upon to process your personal data is also included in this table. We will use your personal data in the following circumstances: where it is necessary for our legitimate interests, or those of a third party and where your interests and fundamental rights are not overridden by those interests, or where we need to comply with a legal or regulatory obligation, or (where personal data is processed in connection with the use of non-essential cookies) with your consent.

Where we need to collect personal data by law or in connection with our website and you fail to provide that information, we may not be able to give you full access to our website.

Purpose / Activity	Type of Data	Legal Basis for Processing
To send you updates on the performance of the Funds, investment letters, fact sheets, invitations to events and other electronic communications.	Identity, contact, user type, marketing preference	a) Our legitimate interests of pursuing and developing our business b) Your consent, if so required
To use data analytics to gain insights and improve our website, including as further detailed in our Cookies Policy.	Technical, usage, user type	a) Our legitimate interests (to understand user behavior and improve our website) b) Your consent (where personal data is processed in connection with the use of non-essential cookies)
To comply with legal or regulatory requirements.	Identity, contact, technical, user type	a) Compliance with our legal and regulatory obligations (including under data protection law)
To scan emails sent to us (including attachments) for viruses or malicious software, to process and encrypt personal data to protect and manage email traffic, and to store personal data on our systems.	Identity, contact data, technical	a) Our legitimate interests including for document retention purposes b) Compliance with our legal and regulatory obligations (including under data protection law)
Such other actions as are necessary to manage the activities of Edgbaston and/or the Funds, including by processing instructions, monitoring and recording electronic communications (including telephone calls and emails) and enforcing or defending the rights and/or interests of Edgbaston and/or the Funds.	Identity, contact, technical, usage, user type	a) Compliance with our legal, tax or regulatory obligations b) Our legitimate interests (including to allow us to effectively conduct our business, process instructions, provide services and enforce or defend our rights)

Links to websites

Where the website provides links to other websites, Edgbaston is not responsible for the data protection/privacy/cookie usage policies of such other websites, and you should check these policies on such other websites if you have any concerns about them. If you use one of these links to leave our website, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting a linked website and such websites are not governed by this policy. You should always exercise caution and review the privacy policy applicable to the website in question.

D. Business Contacts and Service Providers

The following section of this policy sets out how Edgbaston may process personal data (as a controller) about its business contacts and (current, previous and/or potential) service providers (and employees of service providers) and data subjects that have provided a business card to, or have corresponded with, an employee of Edgbaston.

The kind of information we hold about you

We may collect, use, store and transfer different kinds of personal data about you which you provide to us.

We have grouped together the various types of data we may hold about business contacts of Edgbaston as follows:

- *Identity data:* may include names and dates of birth;
- *Contact data:* may include contact details;
- *Financial data:* may include bank account details, invoices and other financial information;
- *Marketing preference data:* may include details of whether you have opted in or opted out of receiving marketing, and details of the types of marketing you wish to receive; and
- *Career data:* may include place of work and job title.

How we will use the information about you and the basis on which we process your data

Your personal data may be processed by Edgbaston or its sub-processors (or any of their affiliates, agents, employees, delegates or sub-contractors) for the purposes detailed in the table below. Details of the legal basis relied upon to process your personal data is also included in this table.

Where we need to collect personal data by law or under the terms of a contract to which you are a party and you fail to provide that data when requested, we may not be able to perform the contract or enter a contract with you (and accordingly may not be able to continue our relationship with you and (if you are a service provider) we may not be able to pay you). We will notify you if this is the case.

Purpose / Activity	Type of Data	Legal Basis for Processing
To hold your personal data on our system and to contact you.	Identity, contact, financial, career	<ul style="list-style-type: none"> a) Our legitimate interests, including in connection with using the services that you provide b) Performance of a contract to which you are a party or in order to take steps at your request prior to entering into such a contract
In respect of suppliers, to allow us to process payments and orders in respect of any goods and services provided.	Identity, contact, financial	<ul style="list-style-type: none"> a) Performance of a contract to which you are a party to allow us to process payments and orders in respect of any goods and services provided

Purpose / Activity	Type of Data	Legal Basis for Processing
To send you updates on the performance of the Funds, investment letters, fact sheets, invitations to events and other electronic marketing communications.	Identity, contact, marketing preference	a) Our legitimate interests of marketing our services b) Your consent, if so required
To comply with legal or regulatory requirements.	Identity, contact, financial	a) Compliance with our legal and regulatory obligations (including requirements to monitor our IT systems to comply with data protection law)
To scan emails sent to us (including attachments) for viruses or malicious software, to process and encrypt personal data to protect and manage email traffic, and to store personal data on our systems.	Identity, contact, financial	a) Our legitimate interests to store personal data on our systems including for document retention purposes b) Compliance with our legal and regulatory obligations (including under data protection law)
Such other actions as are reasonably necessary to manage the activities of Edgbaston and/or the Funds, including by processing instructions, monitoring and recording electronic communications (including telephone calls and emails) and enforcing or defending the rights or interests of Edgbaston and/or the Funds.	Identity, contact, financial	a) Compliance with our legal, tax and regulatory obligations b) Our legitimate interests of pursuing and developing our business

Where processing is being carried out on the basis that it is necessary for the pursuit of Edgbaston's or a third party's legitimate interests, we will only carry out such processing if such legitimate interests are not overridden by your interests, fundamental rights or freedoms.

Disclosure of your Personal Data

We may disclose your personal data to third parties who are providing services to Edgbaston and/or the Funds, including custodians, depositaries, fund administrators, transfer agents and similar, IT service providers, event management providers, background and/or credit reference services, processors of the Funds (including printers, registrars, company secretarial services, administrators) telephone service providers, document storage providers and backup and disaster recovery service providers.

We may also disclose personal data we hold to third parties:

- in the event that we sell any business or assets, in which case we may disclose personal data we hold about you to the prospective and actual buyer of such business or assets; and/or
- if we are permitted by law to disclose your personal data to that third party or are under a legal obligation to disclose your personal data to that third party.

Where we disclose your personal data to third parties, those third parties may in certain circumstances require to process your personal data for purposes and means which they determine. For example, they may need to use your information to comply with their own legal obligations, including under anti-money laundering legislation. In those cases, the relevant service provider will be acting as a controller in respect of your personal data, and its use of your personal data will be subject to its privacy notice (which they are required by law to make available to you).

Data Retention

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for and in accordance with applicable law and regulation. Details of retention periods for different aspects of your personal data are included within our document retention policy. If you provide us with additional information about you, in particular by email or on telephone calls, we may, for regulatory reasons, be required to store the record. We ask that you do not disclose any such information to us if you are uncomfortable with it being stored on our systems to comply with our regulatory obligations.

Change of Purpose

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis that allows us to do so. We may process personal information without your knowledge or consent, where this is required or permitted by law or regulation.

International Transfers

Your personal data may be transferred to external services providers. Where these service providers are based outside the UK and/or European Economic Area (“EEA”) and your personal data is transferred out of these areas by us, we ensure a similar degree of protection is afforded to it. Please contact us if you want further information on the potential transfer of your personal data outside of the UK and/or EEA.

Data Security

Edgbaston has put in place measures designed to ensure the security of the personal data it collects and stores about you. It will use its reasonable endeavours and comply with law to protect your personal data from unauthorised disclosure and/or access, including through the use of network and database security measures, but it cannot guarantee the security of any data it collects and stores. We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

Your Legal Rights

You have a number of rights in relation to the data we hold about you. These include:

- the right of access to your personal data. This enables you to receive a copy of the personal data we hold about you and to obtain information about how we process it.
- the right to request correction of the personal data if it is incomplete or inaccurate.
- in some circumstances, the right to request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for continuing to process it. We may continue to retain your personal data if we are entitled or required to maintain it.
- the right to object to, or to request that we restrict, our processing of your personal data in some circumstances, such as where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal data for direct marketing purposes.
- in some circumstances, the right to request the transfer of your personal data to another party.
- withdraw your consent. If we are processing your personal data on the basis of your consent, you have the right to withdraw such consent at any time. Withdrawing your consent will not affect the lawfulness of processing based on consent before its withdrawal. To withdraw your consent or to opt out of receiving marketing communications, please contact us at sshepherd@edgbastonip.com.
- Make a complaint. If you complain to us, we will respond to your complaint without undue delay and acknowledge your complaint within 30 days, in accordance with the law. You also have the right to make a complaint at any time to the Information Commissioner's Office, the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the regulator.

Edgbaston will not discriminate against an individual as a result of them exercising their legitimate individual privacy rights pursuant to applicable legislation. If you wish to exercise any of the rights set out above, please contact Stephen Shepherd (sshepherd@edgbastonip.com or +44 (0)20 7258-3180). Please note that dependent on circumstances, Edgbaston may not be permitted to comply with such a request.

Accessing Your Data

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances. We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response. We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

Changes to Your Data

The personal data we hold about you needs to be accurate and up-to-date in order to comply with data protection law. Please let us know of any changes to your personal data so that we can correct our records.

Sale of Information

Edgbaston does not offer an opt-out from the sale of personal information because Edgbaston does not engage in the sale of personal information under any circumstances. Furthermore, Edgbaston does not sell or share personal information with third parties for cross-context behavioural advertising, whether or not for monetary or other valuable consideration.

Changes to this Policy

We may update this privacy policy from time to time, and will communicate such updates through our website. We may also notify you from time to time about the processing of your data. On at least an annual basis, Edgbaston provides copies of its privacy policy to its Unitholders. Unitholders may request a copy of the current privacy policy at any time by contacting Edgbaston's Investor Relations representative(s) at clients@edgbastonip.com.

Further Information

Edgbaston Investment Partners LLP and Edgbaston Partners Limited are incorporated in England and Wales. Our registered office is at 105 Piccadilly, London, W1J 7NJ.

If you have any queries about this policy or your personal data, or you wish to submit an access request or raise a complaint about the way your personal data has been handled, please do so in writing and address this to Stephen Shepherd (sshepherd@edgbastonip.com), Chief Compliance Officer at Edgbaston Investment Partners LLP (registered number OC401960), 105 Piccadilly, London W1J 7NJ.

APPENDIX COOKIES POLICY

This cookie policy sets out the basis on which the website operated by Edgbaston Investment Partners LLP and Edgbaston Partners Limited (hereafter, referred to collectively as “Edgbaston” “we”, “us” or “our”) at www.edgbastonip.com uses cookies and similar technologies.

Please read this cookie policy carefully as it contains important information on who we are and how we use cookies and other similar storage and access technologies (“SATs”) on our website. This policy should be read together with our Privacy Policy which sets out how and why we collect, store, use and share personal information generally, as well as your rights in relation to your personal information and details of how to contact us and supervisory authorities if you have a complaint.

Third Party Sites

Throughout our website we may link to other websites owned and/or operated by certain third parties. These other third party websites may also use cookies or similar technologies in accordance with their own separate policies. For privacy information relating to these other third party websites, please consult their policies as appropriate.

Cookies

A cookie is a small text file which is placed onto your device (eg computer, smartphone or other electronic device) when you use our website. We use cookies on our website. These help us operate certain key functions of the site, including to track, measure, and analyse website traffic and user behaviour.

Consent to Use Cookies and Changing Settings

We will ask for your consent to place cookies or other similar technologies on your device, except where they are essential for us to provide you with a service that you have requested.

You can withdraw any consent to the use of cookies or other similar technologies or manage any other such preferences by clicking on the cookie icon at the footer of any page on our site. It may be necessary to refresh the page for the updated settings to take effect.

Our Use of Cookies

The table below provides more information about the cookies we use and why:

Name	Purpose	Whether technology is essential for us to provide services you have requested or whether your consent is required
cf_clearance	<i>A cookie set by cloudflare to acknowledge the visitor has been verified as human</i>	<i>Essential (so we will not request your consent before using this technology)</i>

Name	Purpose	Whether technology is essential for us to provide services you have requested or whether your consent is required
edgbaston_investment_partners_session	Set by the framework our site is built on to identify a specific "session". In this specific instance, the intention is to persist data across page loads.	Essential (so we will not request your consent before using this technology)
XSRF-TOKEN	Set by the framework to prevent "cross site forgery requests"	Essential (so we will not request your consent before using this technology)
__Secure-1PAPISID	Used by Google to authenticate users, protect against fraudulent use, and support secure delivery of Google services such as Google Maps.	Essential (so we will not request your consent before using this technology)
__Secure-1PSID	Maintains user sessions and enables secure login and interaction with Google services embedded on the site, including Google Maps.	Essential (so we will not request your consent before using this technology)
__Secure-1PSIDCC	Provides protection against unauthorised access and helps detect fraudulent login attempts relating to Google services.	Essential (so we will not request your consent before using this technology)
__Secure-1PSIDTS	Supports security measures by managing session timing and helping to prevent misuse of Google services.	Essential (so we will not request your consent before using this technology)
__Secure-3PAPISID	Used by Google for security, service integrity, and authentication when Google Maps content is delivered from third-party Google domains.	Essential (so we will not request your consent before using this technology)
__Secure-3PSID	Stores encrypted account information used to authenticate users and prevent fraudulent use of Google services.	Essential (so we will not request your consent before using this technology)
__Secure-3PSIDCC	Helps protect Google services from abuse by detecting suspicious sign-in behaviour and fraudulent activity.	Essential (so we will not request your consent before using this technology)
__Secure-3PSIDTS	Used to manage secure session states and timing to ensure the integrity of Google service interactions.	Essential (so we will not request your consent before using this technology)
__Secure-BUCKET	Assists with load balancing and routing requests to ensure stable and reliable delivery of Google services such as Maps.	Essential (so we will not request your consent before using this technology)
__Secure-ENID	Used for security purposes, including safeguarding user data and preventing unauthorised access to Google services.	Essential (so we will not request your consent before using this technology)
AEC	Ensures that requests made within a browsing session are from the user and not from malicious actors (cross-site request forgery protection).	Essential (so we will not request your consent before using this technology)
APISID	Used by Google to store user preferences and protect Google services from abuse while enabling secure map functionality.	Essential (so we will not request your consent before using this technology)

Name	Purpose	Whether technology is essential for us to provide services you have requested or whether your consent is required
HSID	Contains encrypted security records used to authenticate users and prevent fraudulent use of Google services.	Essential (so we will not request your consent before using this technology)
NID	Supports security and service integrity, helping Google Maps function correctly and reliably.	Essential (so we will not request your consent before using this technology)
SAPISID	Used to uniquely identify the user's browser for security, authentication, and fraud prevention purposes.	Essential (so we will not request your consent before using this technology)
SEARCH_SAMESITE	Helps ensure cookies are sent in a secure context and protects against cross-site request forgery attacks.	Essential (so we will not request your consent before using this technology)
SID	Stores encrypted user authentication information to support secure delivery of Google services.	Essential (so we will not request your consent before using this technology)
SIDCC	Provides additional protection and security checks to prevent abuse and unauthorised access.	Essential (so we will not request your consent before using this technology)
SSID	Used to store security-related information to authenticate users and safeguard Google services.	Essential (so we will not request your consent before using this technology)
cookie_consent	Stores the user's cookie consent and privacy preference status.	Non-essential so we will request your consent before using this technology
_ga _ga_<container-id> (Google Analytics 4 (GA4))	This is a web analytics service provided by Google Inc which uses cookies to show us how visitors found and explored our site, and how we can enhance their experience. It provides us with information about the behaviour of our visitors (eg how long they stayed on the site, the average number of pages viewed) and also tells us how many visitors we have had.	Non-essential so we will request your consent before using this technology

How to turn off all cookies and the consequences of doing so

If you do not want to accept any cookies, you may be able to change your browser settings so that cookies (including those which are essential to the services requested) are not accepted. If you do this, please be aware that you may lose some of the functionality of our website.

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