

Terms and conditions

Important information regarding the use of this website

The information on this website has been carefully prepared, and it is believed to be accurate when published. We do not, however, give or make any guarantee, representation, warranty or other promise or confirmation (whether express or implied) as to its accuracy or completeness.

By using this website you agree to these terms and conditions. If we amend or update these terms and conditions, which we may do without needing to give you any notice, your continued use of the website indicates your continued acceptance of the amended terms and conditions. If you do not agree to accept and be bound by these terms and conditions you should not use this website and should exit it immediately.

Issuing entity

This website and these terms and conditions are issued by:

Jacobi Asset Management Holdings Limited

Registered office: First Floor Thavies Inn House, 3-4 Holborn Circus, London, United Kingdom, EC1N 2HA. Registered in England No 13638181.

The Fund is issued by Jacobi Asset Management Holdings Limited (FCA: TBC), which is an appointed representative of Cadwyn Capital LLP (FCA:432985), which is authorised and regulated by the Financial Conduct Authority. You can access the FCA website at www.fca.org.uk.

Throughout these terms and conditions, Jacobi Asset Management (Holdings) Limited is referred to as "Jacobi".

Intended audience and use of website content

This website is targeted at and intended for the use of residents in the countries specifically listed as you enter the website. Please note that each country-specific section of this website is governed by that country's laws and regulations. It is your responsibility to be aware of and to observe all applicable laws and regulations of any relevant jurisdiction when accessing the information contained on this website. In particular, no offer or invitation is made to any US persons (being residents of the United States of America or partnerships or corporations organised under the laws of the United States of America or any state, territory or possession thereof), who are excluded from the services, funds and products offered in this site.

The funds described on this website are not available in all countries or to all investors. The information available on this website does not constitute an offer of, or an invitation to apply for or purchase, any securities. In particular, the information does not constitute an offer of, or an invitation to apply for or purchase, securities in any country or jurisdiction where such offer or invitation is unlawful or in which the person making such an offer is not qualified to do so or to whom it is unlawful to make such offer or solicitation.

The information contained in this website is directed only at persons in any country or jurisdiction where

access to that information and the use thereof is not contrary to local law or regulation. Users should only access those parts of the website that are targeted at their particular country or jurisdiction.

The information has been issued and approved by Jacobi and does not in any way constitute investment, legal, tax or other advice. Before making any investment you should read, understand and retain the relevant investment product or service documentation. You should remember that past performance of an investment is not a guide to future performance. If you are in any doubt about any of the information on this website or the suitability of any investment service or product to your needs, please consult your financial or professional adviser.

The funds offered by Jacobi are not generally considered suitable for private investors. Therefore, certain areas of the website are password-protected or require additional confirmation that you are an appropriately experienced or qualified investor. Jacobi may at its discretion refuse applications or requests for further information.

Privacy Policy

This Privacy Policy describes our policies and procedures on the collection, use and disclosure of your information when you use this website and tells you about your privacy rights and how the law protects you.

We use your personal data to provide information to you and improve this website. By using this website, you agree to the collection and use of information in accordance with this Privacy Policy.

Interpretation and Definitions

Interpretation

The words in which the initial letter is capitalized have meanings defined under the following conditions. The following definitions shall have the same meaning regardless of whether they appear in singular or in plural.

Definitions

For the purposes of this Privacy Policy:

- **Account** means a unique account created for You to access our website or parts of our website.
- **Company** (referred to as either "the Company", "we", "us" or "our" in this Agreement) refers to Jacobi.
- **Cookies** are small files that are placed on Your computer, mobile device or any other device by a website, containing the details of Your browsing history on that website among its many uses.
- **Country** refers to the United Kingdom
- **Device** means any device that can access the website such as a computer, a cellphone or a digital tablet.
- **Personal Data** is any information that relates to an identified or identifiable individual.

- **Website Provider** means any natural or legal person who processes the data on behalf of the Company. It refers to third-party companies or individuals employed by the Company to facilitate the website, to provide the website on behalf of the Company, to perform services related to the website or to assist the Company in analyzing how the website is used.
- **Third-party Social Media** refers to any website or any social network website through which a User can log in or create an account.
- **Usage Data** refers to data collected automatically, either generated by the use of the website or from the website infrastructure itself (for example, the duration of a page visit).
- **Website** refers to the website of Jacobi, accessible from <http://www.jacobiam.com>

Changes to the Privacy Policy

We may update Our Privacy Policy from time to time. We will notify you of any changes by posting the new Privacy Policy on this page.

We will let you know via email and/or a prominent notice on our website, prior to the change becoming effective and update the "Last updated" date at the top of this Privacy Policy. You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

Cookie Policy

Tracking Technologies and Cookies

We use cookies and similar tracking technologies to track the activity on our website and store certain information. Tracking technologies used are beacons, tags, and scripts to collect and track information and to improve and analyze our website. The technologies we use may include:

- **Cookies or Browser Cookies:** A cookie is a small file placed on Your Device. You can instruct your browser to refuse all Cookies or to indicate when a cookie is being sent. However, if You do not accept Cookies, You may not be able to use some parts of Our website. Unless you have adjusted Your browser setting so that it will refuse Cookies, Our website may use Cookies.
- **Flash Cookies:** Certain features of Our website may use local stored objects (or Flash Cookies) to collect and store information about Your preferences or Your activity on Our website. Flash Cookies are not managed by the same browser settings as those used for Browser Cookies.
- **Web Beacons:** Certain sections of Our website and Our emails may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit the Company, for example, to count users who have visited those pages or opened an email and for other related website statistics (for example, recording the popularity of a certain section and verifying system and server integrity).

Cookies can be "Persistent" or "Session" Cookies. Persistent Cookies remain on Your personal computer or mobile device when You go offline, while Session Cookies are deleted as soon as You close Your web browser.

We use both Session and Persistent Cookies for the purposes set out below:

Necessary / Essential Cookies

Type: Session Cookies

Administered by: Us

Purpose: These cookies are essential to provide You with services available through the website and to enable You to use some of its features. They help to authenticate users and prevent fraudulent use of user accounts. Without these Cookies, the services that You have asked for cannot be provided, and We only use these Cookies to provide You with those services.

Cookies Policy / Notice Acceptance Cookies

Type: Persistent Cookies

Administered by: Us

Purpose: These Cookies identify if users have accepted the use of cookies on the website.

Functionality Cookies

Type: Persistent Cookies

Administered by: Us

Purpose: These cookies allow us to remember choices You make when You use the website, such as remembering Your login details or language preference. The purpose of these cookies is to provide You with a more personal experience and to avoid You having to re-enter Your preferences every time You use the website.

Collecting and Using Your Personal Data

Types of Data Collected

Personal Data

While using Our website, We may ask You to provide Us with certain personally identifiable information that can be used to contact or identify You.

Personally identifiable information (PII) may include, but is not limited to:

- Email address
- Usage Data

Usage Data

Usage Data is collected automatically when using the website.

Usage Data may include information such as Your Device's Internet Protocol address (e.g. IP address), browser type, browser version, the pages of Our website that You visit, the time and date of Your visit, the time spent on those pages, unique device identifiers and other diagnostic data.

When You access the website by or through a mobile device, We may collect certain information automatically, including, but not limited to, the type of mobile device You use, Your mobile device unique ID, the IP address of Your mobile device, Your mobile operating system, the type of mobile Internet browser You use, unique device identifiers and other diagnostic data.

We may also collect information that Your browser sends whenever You visit Our website or when You access the website by or through a mobile device.

Use of Your Personal Data

The Company may use Personal Data for the following purposes:

- **To provide and maintain Our website**, including monitoring the usage of Our website.
- **To manage Your Account:** to manage Your registration as a user of the website. The Personal Data You provide can give You access to different functionalities of the website that are available to You as a registered user.
- **For the performance of a contract:** the development, compliance and undertaking of the purchase contract for the products, items or services You have purchased or of any other contract with Us through the website.
- **To contact You:** To contact You by email, telephone calls, SMS, or other equivalent forms of electronic communication, such as a mobile application's push notifications regarding updates or informative communications related to the functionalities, products or contracted services, including the security updates, when necessary or reasonable for their implementation.
- **To provide You** with news, special offers and general information about other goods, services and events which we offer that are similar to those that You have already purchased or enquired about unless You have opted not to receive such information.
- **To manage Your requests:** To attend and manage Your requests to Us.
- **For business transfers:** We may use Your information to evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, sale or transfer of some or all of Our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which Personal Data held by Us about Our website users is among the assets transferred.
- **For other purposes:** We may use Your information for other purposes, such as data analysis, identifying usage trends, determining the effectiveness of Our promotional campaigns and evaluating and improve Our website, products, services, marketing and Your experience.

We may share Your personal information in the following situations:

- **With Website Providers:** We may share Your personal information with Website Providers to monitor and analyze the use of Our website, to contact You. Some of Our Website Providers may be located outside the United Kingdom and may be subject to different Data Protection law.
- **For business transfers:** We may share or transfer Your personal information in connection with, or during negotiations of, any merger, sale of Company assets, financing, or acquisition of all or a portion of Our business to another company. Some of Our business transfers may take

place to locations outside the United Kingdom and may be subject to different Data Protection law.

- **With Affiliates:** We may share Your information with Our affiliates, in which case we will require those affiliates to honour this Privacy Policy. Affiliates include Our parent company and any other subsidiaries, joint venture partners or other companies that We control or that are under common control with Us. Some of Our Business Affiliates may be located outside the United Kingdom and may be subject to different Data Protection law.
- **With business partners:** We may share Your information with Our business partners to offer You certain products, services or promotions. Some of Our business partners may be located outside the United Kingdom and may be subject to different Data Protection law.
- **With Your consent:** We may disclose Your personal information for any other purpose with Your consent.
- **As required by law or regulation:** There may be situations where law or regulation requires us to share Your data with appropriate authorities.

Retention of Your Personal Data

The Company will retain Your Personal Data only for as long as is necessary for the purposes set out in this Privacy Policy. We will retain and use Your Personal Data to the extent necessary to comply with Our legal obligations (for example, if we are required to retain Your data to comply with applicable laws), resolve disputes, and enforce Our legal agreements and policies.

The Company will also retain Usage Data for internal analysis purposes. Usage Data is generally retained for a shorter period of time, except when this data is used to strengthen the security or to improve the functionality of Our website, or We are legally obligated to retain this data for longer time periods.

Transfer of Your Personal Data

Your information, including Personal Data, is processed at the Company's operating offices and in any other places where the parties involved in the processing are located. It means that this information may be transferred to — and maintained on — computers located outside of Your state, province, country or other governmental jurisdiction where the data protection laws may differ from those from Your jurisdiction.

Your consent to this Privacy Policy followed by Your submission of such information represents Your agreement to that transfer.

The Company will take all steps reasonably necessary to ensure that Your data is treated securely and in accordance with this Privacy Policy and no transfer of Your Personal Data will take place to an organization or a country unless there are adequate controls in place including the security of Your data and other personal information.

Some transfers of Your personal data may be made to locations outside the United Kingdom and may be subject to different Data Protection law.

Disclosure of Your Personal Data

Business Transactions

If the Company is involved in a merger, acquisition or asset sale, Your Personal Data may be transferred. We will provide notice before Your Personal Data is transferred and becomes subject to a different Privacy Policy.

Law enforcement

Under certain circumstances, the Company may be required to disclose Your Personal Data if required to do so by law or in response to valid requests by public authorities (e.g. a court or a government agency).

Other legal requirements

The Company may disclose Your Personal Data in the good faith belief that such action is necessary to:

- Comply with a legal obligation
- Protect and defend the rights or property of the Company
- Prevent or investigate possible wrongdoing in connection with the website
- Protect the personal safety of users of the website or the public
- Protect against legal liability

Security of Your Personal Data

The security of Your Personal Data is important to Us, but remember that no method of transmission over the Internet or method of electronic storage is 100% secure. While We strive to use commercially acceptable means to protect Your Personal Data, We cannot guarantee its absolute security.

Children's Privacy

Our website does not address anyone under the age of 13. We do not knowingly collect personally identifiable information from anyone under the age of 13. If You are a parent or guardian and You are aware that Your child has provided Us with Personal Data, please contact us. If We become aware that We have collected Personal Data from anyone under the age of 13 without verification of parental consent, We take steps to remove that information from Our servers.

If We need to rely on consent as a legal basis for processing Your information and Your country requires consent from a parent, We may require Your parent's consent before We collect and use that information.

Links to Other Websites

Our website may contain links to other websites that are not operated by Us. If You click on a third party link, You will be directed to that third party's site. We strongly advise You to review the Privacy Policy of every site You visit.

We have no control over and assume no responsibility for the content, privacy policies or practices of any third party sites or services.

Identity theft and fraud

What is identity theft and fraud?

Identity fraud is where someone impersonates You without Your knowledge or consent or uses Your personal information to obtain money, goods or services. More information on the types and incidences of identity fraud is available from the FCA website (opens in a new window), which contains tips on how to protect Yourself, what to do if it happens to You and contact details of organisations that can help.

How does identity theft and fraud occur?

It can occur when someone fraudulently represents a legitimate company - either online or by telephone - and tricks You into divulging personal information. A common method is phishing, the act of sending an email that fraudulently represents a legitimate company and lures You into revealing personal and financial information that could then be used for identity theft. In addition, these fraudulent emails may contain trojans or viruses. A trojan is a computer programme that may seem innocent but has been designed to damage Your computer or send confidential information over the internet to another computer. A virus is a computer programme that runs on Your computer without Your knowledge. If You are in any doubt about whether an email is genuine do not open it or click on any links it contains.

How can I spot a scam or phishing email?

Initially, phishing emails look genuinely like those from financial services companies. They may have an official-looking logo and information taken from legitimate websites. However, there are things You should look out for:

- Jacobi Asset Management, or its associates, will never contact You by telephone or email asking You to verify Your account details. You should not respond to any email asking You to verify Your account number or sign-on details, or seeking similar confirmations, which purports to be from Jacobi Asset Management.
- Beware of links in emails. Always check financial websites carefully to make sure the web address is correct and is not spelt slightly differently.
- Genuine emails from Jacobi Asset Management may contain links. However, we will not send any email with links to the online sign-in page.

What should I do if I have received a suspicious email?

- Forward the suspicious email to jacobi@jacobiam.com
- Delete the email.
- Do not respond to or access any links contained within the email.

Contact Us

If You have any questions about this Privacy Policy, You can contact us by email at jacobi@jacobiam.com.