

# POLAR CAPITAL GLOBAL HEALTHCARE TRUST PLC

and

## PCGH ZDP PLC

### PRIVACY NOTICE

Polar Capital Global Healthcare Trust PLC and PCGH ZDP PLC (the “Company”, “we”, “us”, “our”) is the Data Controller in relation to information which is collected, stored and processed which belongs to its investors, service providers and suppliers.

The Company itself does not process any personal data, however it has appointed third-party processors such as Equiniti Limited as its registrar (“Equiniti”) and Polar Capital LLP (“Polar Capital”) as its investment manager to act as key Data Processors in relation to any personal data it may deal with.

Equiniti may obtain data directly from you in its role as registrar for the Company. Such personal data will be dealt with in accordance with the Equiniti privacy notice which can be found on its website at <https://privacy.equiniti.com>.

Polar Capital may obtain data directly from you in its role as investment manager for the Company. Such personal data will be dealt with in accordance with this Privacy Notice.

In addition, when you visit the Company’s website, we may also collect information about your usage of the website as well as information about you from e-mails, letters or any other correspondence between you and the Company.

The Company may update this Privacy Notice from time to time and will publish an up to date copy of the Privacy Notice from time to time on the Company’s website.

#### 1 Contact Details of the Controller

If you have any questions relating to your data or how it is collected or processed, please address them using the contact details below.

**Address:** Polar Capital Global Healthcare Trust Plc / PCGH ZDP PLC  
16 Palace Street, London, SW1E 5JD

**Email:** [data.protection@polarcapital.co.uk](mailto:data.protection@polarcapital.co.uk)

**Contact:** Boura Kym Tomlinson Cann – Polar Capital Group Chief Legal and Compliance Officer

#### 2 What Personal Data we hold on you

Please see below for a summary of the personal data which may be collected and processed about you, depending on your circumstance and your role:

Type of Information	Examples
	<i>Please note these examples are illustrative and non-exhaustive</i>
<b>Information about you:</b>	name, address, date of birth, marital status, nationality, contact information, payment details, identity verification documents, information relating to tax residency status,

	and preferred language, IP addresses, job title, place of employment.
<b>Information to contact you at work or home:</b>	name, address, telephone, and e-mail addresses.
<b>Information to identify you:</b>	Photographs, passport and/or driving licence details, electronic signatures.

### 3 Why do we need to collect and use your personal information?

In order to continue to provide services to you and in order to facilitate day to day business communications, your information may be processed in the manner described below:

<b>Purposes for which we need your personal information:</b>	<b>Examples</b> Please note that the examples are illustrative and non-exhaustive.	<b>Basis for Processing</b>
<b>Correspondence with you</b>	<ul style="list-style-type: none"> <li>When you email the Company your contact information will be stored within Polar Capital's email network;</li> <li>Letters received by the Company or Polar Capital in relation to your investment will be processed in order to deal with any queries or actions related to your correspondence.</li> </ul>	<ul style="list-style-type: none"> <li>To ensure we can remain in contact with you in order that you are kept informed about the investment you have.</li> </ul>
<b>Shareholder Register Analysis</b>	<ul style="list-style-type: none"> <li>Quarterly Shareholder Analysis is provided by Equiniti and circulated to the Company's directors as well as Polar Capital's Sales Team and corporate brokers.</li> </ul>	<ul style="list-style-type: none"> <li>In order for the Board and Polar Capital's Sales Team to be updated on changes in the shareholder register. Particular attention is paid to larger institutional holders, to monitor market activity, the impact on any discount, and to aid preparation for corporate actions.</li> </ul>
<b>Corporate Actions</b>	<ul style="list-style-type: none"> <li>During IPOs and Corporate Actions investor details are collected by the Polar Capital Sales Team and brokers.</li> </ul>	<ul style="list-style-type: none"> <li>For the purposes of monitoring potential and actual IPO investment. Data may be collected and held prior to, during and on completion of corporate actions.</li> </ul>
<b>Shareholder Servicing</b>	<ul style="list-style-type: none"> <li>To distribute marketing materials such as: factsheets, presentations etc;</li> <li>To invite investors to meetings;</li> </ul>	<ul style="list-style-type: none"> <li>In order to inform our investors of Polar Capital products and to ensure we are treating our customers fairly we process contact information in order that investors in Polar Capital</li> </ul>

	<ul style="list-style-type: none"> <li>To respond to enquires or investor requests for further information.</li> </ul>	products receive relevant updates relating to their investments. This is to fulfil Polar Capital business legitimate interests.
<b>Ongoing legal obligations</b>	<ul style="list-style-type: none"> <li>To comply with our legal obligations;</li> <li>To ensure that the information is being sent to the correct jurisdiction.</li> </ul>	<ul style="list-style-type: none"> <li>Polar Capital Global Healthcare Trust, PCGH ZDP and Polar Capital are subject to regulation in the UK, Europe and the US and as such we may require your data to ensure we are in compliance with regulations from these authorities from time to time.</li> </ul>

For further information on how Equiniti process your data, please access a copy of their privacy notice at <https://privacy.equiniti.com>.

For any queries regarding the specific legal obligations we are required to comply with while processing your data, please contact Polar Capital's Compliance Department at [data.protection@polarcapital.co.uk](mailto:data.protection@polarcapital.co.uk) for further information.

In instances where your personal information is processed to carry out our legal duty or to carry out our contract of investment with you, your refusal to provide the information required may lead to us not being able to facilitate our responsibilities towards your investment, such as providing you with updates on the Company.

Where we are collecting from and processing personal data for you for our legitimate interests, you have the right to object to this processing. This right is addressed in Section 8. Please be aware that although the processing of some data is categorised as under our legitimate interest, this is to meet legal obligations from outside of the EU.

## 5 How long do we keep your data for?

Your data will not be kept for longer than is required to fulfil our obligations in point 3.

Where your data is required to be maintained to comply with a legal obligation in relation to your investment in the Company, we may be required to retain such data for 7 years following the end of your investment, or longer if the relevant regulatory authority requires.

## 6 Transfers of Data to Third Countries

All the personal data processed by Polar Capital is processed by their staff in the UK, however, for the purposes of IT hosting and maintenance, emails containing personal data are located on servers based in Canada. In order to ensure safeguards in relation to this transfer, we maintain administrative, technical and contractual safeguards designed to protect personal information we obtain directly from you against accidental, unlawful or unauthorized destruction, loss, alteration, access, disclosure or use.

Polar Capital's websites are hosted by Huguenots Services Limited who may act as data controller on behalf of your personal data. Please contact them for further information on their Privacy Policy in relation to your personal data at <http://www.huguenots.co.uk/#>.

For further information on Equiniti's transfers to third countries, please access a copy of their privacy notice at <https://privacy.equiniti.com>.

## 7 How do we protect your personal information?

We have security arrangements in place to guard against unauthorised access, improper use, alteration, destruction or accidental loss of your personal information.

We take appropriate organisational and technical security measures and have rules and procedures in place to ensure that any personal information we hold on computer systems is not accessed by anyone it shouldn't be.

When we use third party organisations to process information on our behalf we ask them to demonstrate their compliance with our security requirements, any instructions we may give them and their compliance with relevant data protection legislation throughout the time they work for the Company. These organisations take their instructions from us and their obligations with regard to what information they process and what they can do with it are agreed in the contracts we have with them.

## 8 Your Rights

You are entitled to exercise certain rights in relation to your data as of 25 May 2018. These rights may be subject to statutory restrictions, where they are applicable. The rights include:

- The right to access your data;
- The right to rectify any errors in your data;
- The right, in certain circumstances, to erase your data;
- The right to restrict the processing of your data;
- The right, in certain circumstances, to object to your data being processed;
- The right to withdraw consent; and
- The right to complain

Requests to access your data under the GDPR are free. However, please be aware that if the request is considered unfounded, excessive or repetitive, we reserve the right to charge a fee for access.

Where data is provided by you on the basis of consent, you are within your rights to withdraw that consent at any time. Withdrawal of consent may result in benefits that were otherwise provided to you being withdrawn.

Please note that where your personal data is processed for the purposes of our legitimate interests, you have a right to object to such processing and the Company and its appointed service providers will no longer process the personal data until it can be demonstrated that we have compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defence of legal claims.

## 9 Complaints

If you have an issue with the Company using your data in any way detailed in this notice, or you believe that your data is not being treated in the way described herein, please contact [data.protection@polarcapital.com](mailto:data.protection@polarcapital.com) or write to Data Protection at Polar Capital, 16 Palace Street, London, SW1E 5JD so that we can resolve any issue.

If you would like further information on how Equiniti process your personal data, please contact them by email at [DPO@equiniti.com](mailto:DPO@equiniti.com) or by post at Data Protection Officer, Equiniti, Highdown House, Yeoman Way, Worthing, West Sussex, BN99 3HH.

The Information Commissioners Officer ('ICO') is the supervisory authority in the UK for data protection. You may contact them should you have a complaint to make regarding the treatment of your personal data.

**Website:** <https://ico.org.uk/global/contact-us/>

**Address:** Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

**Tel:** 0303 123 1113