

Jan'26

GDPR Privacy Policy Statement LMR Partners LLP

Dec 2025

lmr partners

LMR Partners LLP ("Firm") is a company registered in England and Wales with company number OC347294. LMR Partners LLP is authorised and regulated by the Financial Conduct Authority ("FCA") with Firm Reference Number 504126.

For the purposes of the General Data Protection Regulation ("GDPR"), LMR will be the 'controller' of the personal data you provide. Please read the following information carefully to understand LMR's practices in relation to the treatment of your personal data. Should you have any questions, please email LMR at Compliance@lmpartners.com.

What data privacy principles does the Firm adhere to?

- LMR will process all personal data in a lawfully, fair and transparent manner;
- LMR will only collect personal data where it is necessary;
 - For LMR to provide a service to you;
 - For you to provide a service to LMR;
 - For LMR to keep you informed of its products and services; or
 - For LMR to comply with its legal and regulatory obligations.
- The personal data collected by LMR will be adequate, relevant and limited to what is necessary in relation to the specific purpose for which your data will be processed;
- LMR will take all reasonable steps to ensure that personal data is accurate and, where necessary, kept up to date;
- LMR will maintain personal data in a form that permits identification no longer than is necessary for the purposes for which the personal data has been collected for processing, in accordance with LMR's record retention requirements as mandated by the Financial Conduct Authority;
- LMR will hold and process personal data in a manner that ensures appropriate security;
- LMR will only share personal data where it is necessary to provide the agreed service or where it is necessary for LMR to comply with its legal and regulatory requirements.
- LMR will only utilise a service provider based outside of the UK for the processing of personal data where this is strictly necessary to facilitate our services to you. In all cases, we will ensure service providers are fully compliant with GDPR, or deemed equivalent, ahead of transferring any personal data.

What personal data does the Firm collect and why?

In the course of providing products/services to you, LMR may collect information that is considered personal information (e.g. name, contact details, address, passport number, driving licence).

As a client, contact or employee of LMR, we will require some personal information to verify your identity and have the applicable relationship with you. Some of this information may be required to satisfy legal obligations (e.g. to comply with obligations arising under the money laundering regulations whereas other information may be required in connection with the provision of services to you). The information collected will vary depending on the service LMR provides to you, or you provide to LMR, but typically includes:

- Personal information: Such as your name, date of birth, passport number or national insurance number;
- Contact information: Including your address, telephone number and email address.

Where does the Firm store my personal data?

LMR has comprehensive policies and procedures in place to ensure your personal data is kept safe and secure, with these including:

- Data encryption;
- Firewalls;
- Intrusion detection;
- 24/7 physical protection of the facilities where your data is stored (i.e. data centres);
- Background checks for employees that access physical facilities; and
- Security procedures across all service operations.

How long does the Firm retain personal data?

As a regulated entity, LMR is required to maintain its books and records for a prescribed period (five years from either the ceasing of a business relationship, or, in the case of non-clients, from the making of a record – or alternatively, for seven years, where specifically requested to do so by the Financial Conduct Authority). As such, information that falls in scope of either of these requirements is retained in line with the mandated timeframe.

Any information that is outside the scope of this requirement will be retained whilst relevant and useful, and destroyed where this ceases to be the case or where the data subject specifically requests this.

How have I been categorised in accordance with GDPR?

The GDPR requires LMR to inform you of the legal basis on which we maintain your personal data. Typically, LMR will reach out to you personally to confirm this; however, as a general rule the following is applicable:

- Clients – Information is maintained on the basis of contractual obligation and/or legitimate interests (where relevant);
- Service providers – Information is maintained based on contractual obligation; and
- Database/marketing contacts – Information is maintained based on legitimate interest.

What are my rights?

Once you have provided your details to LMR, you have certain rights which apply, depending on your relationship with LMR, the information you have shared with us and LMR's legal and regulatory obligations.

- You have the right to request a copy of the information that we hold about you. If you would like a copy of some, or all, of your personal information, please email LMR. LMR will provide this information to you within one month (with the ability to extend this by an additional two months where necessary), free of charge.
- You have the right to request that the information LMR holds about you is erased under certain circumstances including where there is no additional legal and/or regulatory requirement for LMR to retain this information.
- As a client, you have the right to request that any information LMR holds about you be provided to another company in a commonly used and machine-readable format, otherwise known as 'data portability'.
- You have the right to ensure that your personal information is accurate and up to date, or where necessary rectified. Where you feel that your personal data is incorrect or inaccurate and should therefore be updated, please email LMR.
- You have the right to object to your information being processed, for example for direct marketing purposes.
- You have the right to restrict the processing of your information, for example limiting the material that you receive or where your information is transferred.

- You have the right to object to any decisions based on the automated processing of your personal data, including profiling.
- You have the right to lodge a complaint with the Information Commissioner's Office (<https://ico.org.uk/concerns/>) if you are not happy with the way that we manage or process personal data.

Will I be notified of changes to this policy?

LMR may, from time to time, review and update this policy. Compliance maintains the latest version of this policy and where the changes are deemed material, it will make you are aware of these.

Who should I direct questions to?

If you have any questions, concerns or complaints about the practices contained within this Privacy Policy, or regarding how LMR has handled your data, please email LMR at Compliance@lmpartners.com. Alternatively, you may write to LMR at address: 9th Floor, Devonshire House, 1 Mayfair Place, W1J 8AJ

Disclaimer

This document is issued in the United Kingdom (UK) by LMR Partners LLP (LMR), which is authorized and regulated by the UK Financial Conduct Authority (FCA). This document is being supplied to you solely for informational purposes only, does not constitute an offer to sell or solicitation of an offer to buy shares of the Fund in any jurisdiction, and is not to be construed as an offering memorandum, advertisement or prospectus. Please refer to the relevant Fund's prospectus for full details on the Fund's material terms (including risk factors, conflicts of interests, fees and charges, and regulatory and tax considerations), before deciding whether to invest in the Fund. Prospective investors are urged to consult with their own advisers to obtain legal, tax, investment, or other advice. Portfolio information may not represent realisable values. Past performance is not necessarily indicative of future results and the Fund's performance may be volatile. LMR's investment strategies may be speculative and involve a substantial degree of risk. The strategies may be leveraged and engage in other speculative investment practices that may increase the risk of investment loss.

LMR Partners LLP, registered office 9th Floor, Devonshire House, 1 Mayfair Place, W1J 8AJ, partnership registered in England and Wales number OC347294.

Imr partners

Imrpartners.com