

SEP '25

LMR Partners Data Protection and Privacy Policy Summary

SEP 2025

lmr partners

LMR Investment Group¹

Data Protection and Privacy Policy Summary

LMR Partners ("LMR", "Firm") recognises the need to treat any personal information it processes during the course of its business activities in an appropriate and lawful manner. LMR maintains a Data Protection Policy ("the Policy")² to ensure it is compliant with the General Data Protection Regulation ("GDPR")³ and the Data Protection Law DIFC Law No. 5 of 2020. The Policy applies to all employees and outsourced service providers when personal data is processed. Any reference to LMR processing data can also be read to refer to third parties that process data on behalf of LMR, unless specified to the contrary.

All personal data will be collected and processed in accordance with the 'lawfulness of processing' ('legal basis') obligations under the GDPR. Generally, personal data relating to clients/investors and the Firm's employees will be for the purposes of 'legitimate interests'. However, each case will be considered and determined in line with the 'lawfulness of processing' requirements. Where deemed appropriate e.g. for marketing purposes, then freely given specific consent will be requested.

LMR makes use of services provided by various third-parties. Due diligence on these providers has been undertaken by LMR to ensure they are able to meet the standards expected by LMR and to satisfy LMR of their compliance with GDPR. Some of these entities will be involved in the transfer of, and the processing of, personal data on behalf of the firm and as such will be 'data processors'. LMR notes that some third parties have identified themselves as controllers due to the responsibility of determining how to process information.

LMR Partners maintain physical, electronic and procedural arrangements that comply with GDPR to safeguard the personal information that we hold. The firm restricts access to personal information to those employees who need to know that information. As far as is reasonably practicable, the firm ensures that personal information that they hold is accurate and they endeavour to keep such personal information up to date.

Information provided to data subjects, either as a result of the exercise of a data subject's rights or when informing the individual that their personal data is being collected and its purpose, will be free of charge. However, where such requests are excessive or noticeably unfounded then LMR reserves the right to charge a reasonable fee.

¹ LMR Investment Group includes LMR Partners LLP (UK), LMR Partners Limited (Hong Kong), LMR Partners LLC (US), LMR Partners AG (Switzerland), LMR Partners (DIFC) Limited (UAE), and LMR Partners (Ireland) Limited (Ireland).

² A copy of LMR's GDPR Data Protection Policy is available upon request.

³ The UK GDPR is the retained EU law version of the EU GDPR. LMR additionally has a distinct GDPR Privacy Policy for LMR Funds/Investors and a Privacy Notice that complies with CFTC Regulation 160 and SEC Regulation S-P which can be found on LMR's website.

