



Brooker Sukhothai Fund

Privacy Notice

The Brooker Sukhothai Fund Limited (BSFL or the Fund) is committed to protecting personal and other data that the company collects in the course of its business. This document gives notice of the policies involved in the collection of that data, the type of information and the possible uses, the safeguards, investors' rights and acceptances.

BSFL is a Mutual Fund incorporated in the Cayman Islands and operates under the Mutual Funds Law of the Cayman Islands. Personal data is held internally at BSFL, its manager, Brooker Dunn Asset Advisory (BDAAL) and at the Fund Administrator, SS&C Technologies Inc (SS&C). Personal data may also be held by intermediate agents who introduce investors to the Fund. This Policy document does not cover those agents who are directly responsible to the investors they introduce or act on behalf of, however the information received by the Fund, from those agents, is covered in this policy document.

In terms of the General Data Protection Regulation (GDPR) terminology, BSFL and BDAAL are data controllers and SS&C are data processors. There may be a need to engage with other service providers in meeting regulatory requirements. These possible other service providers would also be data processors.

Collection of Data

Personal data is collected through the following means :

1. Subscription forms
2. Details on emails
3. Documents, including regulatory documents (such as CRS forms) received through email, fax, courier or post.
4. Information received via the company service providers and agents.

The type of information the Fund might collect

1. Personal contact data, including email address(es), telephone and fax numbers, residential and/or business addresses.
2. Bank details received during the subscription and redemption processes.
3. Various details will be collected through the Anti-money Laundering (AML) and Know Your Customer (KYC) processes. This information may include passport information, details of residential address and other contact information possibly in addition to (1) above and other banking details as required, including sources of funds. Data relating to sources of Funds could be far reaching and will be held alongside other data collected.
4. Information required for regulatory filings and other regulatory requirements. The Fund is required to submit data collected for regulatory purposes. This mostly relates to, but is not restricted to agreements under the US Foreign Account Tax Compliance Act (FATCA) and OECD



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Common Reporting Standard (CRS) and the laws of the Cayman Islands where investors are required to complete self-certification forms. The information included on these forms may include personal tax information including tax residence and tax identification numbers. For the purposes of US FATCA, CRS, and previously under UKCDOT (UK Crown Dependencies and Overseas Territories), the Fund has entered into service agreements with SS&C Technologies Inc to collect and provide the reports to the Fund for the Fund to file with the Cayman Islands authorities, as required.

5. The value of the subscriptions and redemptions, including the monthly valuations of the investment in the Fund, is data that is maintained by the Fund and the Administrator.

Possible uses and sharing of information

The Fund operates in compliance with Cayman Islands regulations and strives to meet the best professional business practices for the industry.

Although the Fund collects and stores information it is not necessarily shared and will only be shared outside the company and the Administrator if there is a documented requirement. The company and the administrator do share information as required for each other's internal purposes, as well as for external authorities.

The collection of AML and KYC data is a requirement of regulators and international organizations including banks and service providers. This information may be required to be shared either under internal rules of doing business with service providers or as a regulatory requirement.

The Tax information collected in (4) above will be uploaded to the Cayman Islands Automatic Exchange of Information (AEOI) portal as required by the Cayman Island authorities. The Cayman Island authorities will exchange the uploaded information with other reporting country tax authorities depending on the data submitted by the investor.

Data Safeguards

BSFL is committed to safeguarding all the data it holds. The safeguards and policies to protect all data, including personal data of our investors, is reasonably designed to provide physical, procedural and electronic safety.

BSFL has signed a GDPR Supplemental Letter Agreement to include GDPR regulations in the relationship with SS&C, the Fund Administrator. BSFL considers SS&C to have adequate privacy policies and to be fully compliant with GDPR regulations. Further information and contact points for SS&C privacy policy can be found at <https://ssctech.com/about-us/privacy>

BSFL will not hold data for longer than 7 years unless required to by law and after this period BSFL will delete and shred the personal data no longer required.



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Investors rights to access, to complain, to object and to comment

Investors have a right to access the personal data held by BSFL. Investors can update or alter incorrect information and can place restrictions on use of data, other than where that data is required to be processed for regulatory purposes.

To comment or access the personal data held or to complain or object to data usage, investors can email contact@brookersukhothaifund.com

Investors can also lodge complaints with regulatory bodies that are set up to protect data in the investors' country of residence.

Acceptance of this Privacy Notice

Please note that there are a number of places that you may have agreed to the collection and use of your personal data during your involvement with BSFL. These include, but are not restricted to the Subscription document and reference to the PPM and the Self certification processes.

Further to those, by taking no action upon receipt of this Privacy Notice, you accept and agree to the collection and use of your personal data for the purposes set out above.

This policy is updated as required and the latest version is available at the email address contact@brookersukhothaifund.com

Updated on 31st October 2018