

Hartree Privacy Policy

Effective Date: 17 December 2020

1. Introduction

The protection and security of your personal data are important to Hartree Partners (“**Hartree Partners**”, “**we**” or “**us**”). The purpose of this Privacy Policy is to outline how we deal with any personal data when you visit this website (“<http://www.hartreepartners.com/>”) (“**Website**”) and tell you about your privacy rights.

Our Website has been developed and is operated by Hartree Partners, LP of 1185 Avenue of the Americas, New York, NY 10036, United States of America who is the controller of your personal data processed in connection with our Website.

Please read this Privacy Policy to understand how we may process your personal data provided via our Website.

2. Types of Information Collected

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data). We may collect, use, store and transfer different kinds of personal data about you as follows:

- **Contact Data** includes name, address, email address and telephone number.
- **Employment Data** includes company you work for and job title.
- **Transaction Data** includes details about products or services your request from us.
- **Technical Data** includes information about how you use our website, internet protocol (IP) address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access our Website.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us.

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with products or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

3. Purposes for processing your personal data

We may process any personal data you provide to us to enable us to perform the contract entered into between you and us, to ensure our compliance with legal and regulatory requirements or for the purposes of our legitimate business interests, including the following:

- to enable us to carry out our obligations arising from any contracts and to provide you with the information, products and services that you request from us;
- to enable us to respond to an enquiry or other request you make when you contact us via our Website, including for customer services support;
- to comply with our legal obligations, standards, policies and procedures;
- to notify you about changes to our service;
- to enable us to issue a notice or corrective action to you in relation to any of our services,

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- if required;
- to better understand how you interact with our Website, including its functionality and features, and ensure that content is presented in the most effective manner; and
- to communicate and provide you with the relevant market information you have requested in our newsletters (by email).

4. Marketing

We may also use your personal data to send you marketing-related information (such as newsletters) from Hartree Partners where it is linked to the service we are providing you. You may unsubscribe at any time by clicking on the “unsubscribe” link at the bottom of each marketing communication.

Please note that where you opt-out of receiving marketing communications, we may still send you certain communications relating to your use of our service, such as service announcements, notices about information on the service and administrative messages.

5. Cookies

Our Website uses cookies to distinguish you from other users of our Website. This helps us to provide you with a good experience when you browse our Website and also allows us to improve our Website. A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer. Cookies contain information that is transferred to your computer's hard drive.

Cookies can be persistent by remaining on your computer until you delete them or be based on your browsing session where they delete once you close your browser.

We use the following cookies:

- **Strictly necessary cookies.** These are cookies that are required for the operation of our Website. They include, for example, cookies that enable you to log into secure areas of our Website.
- **Analytical or performance cookies.** These allow us to recognise and count the number of visitors and to see how visitors move around our Website when they are using it. This helps us to improve the way our Website works, for example, by ensuring that users are finding what they are looking for easily.

You can find more information about the individual cookies we use and the purposes for which we use them in the table below:

Cookie File	Purpose	Expiry
APISID, NID	Used by Google to display personalized advertisements on Google sites, based on recent searches and previous interactions.	2 years
NID	Used by Google to display personalized advertisements on Google sites, based on recent searches and previous interactions.	6 months
PREF	Used by Google to remember information that changes the way the Website behaves or looks, such as your preferred language or the region you are in.	9 months
SID, HSID	Used by Google to authenticate users, prevent fraudulent use of login credentials, and protect user data from unauthorized parties.	2 years

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GA	Registers a unique ID that is used to generate statistical data on how visitors use the Website.	2 years
GAT	Used by Google Analytics to throttle request rates, limiting the collection of data on high traffic sites.	24 hours
GID	Registers a unique ID used to generate statistical data on how visitors use the Website.	24 hours

Google is a third party who may also use cookies, over which we have no control. These third party cookies are mostly analytical cookies or performance cookies or targeting cookies. For further details on these cookies or to deactivate the use of these third party cookies, please see <https://policies.google.com/technologies/types>.

You can find more information about cookies in general, please see www.allaboutcookies.org and www.aboutcookies.org.

You can block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our website.

6. Sharing your personal data

We may share your personal data with:

- our affiliated companies;
- Government bodies and agencies in your jurisdiction and overseas (for example, the UK Financial Conduct Authority) to comply with our legal and regulatory obligations;
- third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy; and
- our service providers that we engage to provide services for us. Where we provide your personal data to third party services providers, they are required to keep your personal data confidential and secure, and must only use your personal data as instructed by us.

We may also disclose your personal data where required to respond to authorized requests from government authorities or where required by law, including for national security. Where required by law, we may also disclose your personal data where necessary to enforce or apply our Website Terms or other agreements, to investigate or protect the rights, property or safety of Hartree Partners and our group companies, our products and services and our personnel, customers, distributors or business partners or to prevent or take action regarding illegal activities or fraud, situations involving potential threats to the safety of any person or as evidence in litigation or investigations.

7. Keeping your Personal Data Secure

We will take all reasonable steps (including appropriate technical and organisational measures) to ensure your personal data is processed securely to protect the confidentiality, integrity and availability of your personal data and in accordance with this Privacy Policy.

The nature of the Internet is such that we cannot guarantee or warrant the security of any information you transmit to us via the Internet and any transmission is at your own risk.

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8. Storing your Personal Data

Your personal data collected via our Website will be stored on servers located in the United Kingdom. It may also be processed by, and transferred to, Hartree Partners staff or by one of our service providers operating in the United States, India or Singapore. This includes individuals engaged in, among other things, administration of an enquiry or request you make via our Website or the provision of support services.

We have implemented appropriate safeguards, to protect your personal data when it is transferred. Please contact our Hartree Data Protection Group by email at GDPR@hartreepartners.com if you want further information on the specific mechanism used by us when transferring your personal data out of the United Kingdom or European Economic Area or by mail at Hartree Partners, LP of 1185 Avenue of the Americas, New York, NY 10036 for the attention of Hartree Legal (Data Protection Group).

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. To determine the appropriate retention period for personal information, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure of your personal data, the purposes for which we process your personal information and whether we can achieve those purposes through other means, and the applicable legal requirements.

9. Your Rights

You may inform us of any changes to your personal data, and in accordance with our obligations under applicable data protection laws we will update or delete your personal data accordingly. To find out what personal data we hold on you or to have your personal data updated, amended or removed from our database, please contact us using our contact information below.

Residents of the United Kingdom and European Economic Area ('EEA'): You may have the right to: request (a) access the to your personal data we hold about you; (b) request we correct any inaccurate personal data we hold about you; (c) request we delete any personal data we hold about you; (d) restrict the processing of personal data we hold about you; (e) object to the processing of personal data we hold about you; and/or (f) receive any personal data we hold about you in a structured and commonly used machine-readable format or have such personal information transmitted to another company. You also have the right to lodge a complaint about how we process your personal data with the supervisory authority for data protection issues in your country.

We may ask you for additional information to confirm your identity and for security purposes, before disclosing information requested to you.

To exercise any of your rights in connection with your personal data, please contact our Hartree Data Protection Group by email at GDPR@hartreepartners.com or by mail to Hartree Partners, LP of 1185 Avenue of the Americas, New York, NY 10036 for the attention of Hartree Legal (Data Protection Group). We will process any request in line with any local laws and our policies and procedures.

10. Third-Party Links

This Website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our Website, we encourage you to read the privacy policy of every website you visit.

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11. Changes to this Privacy Policy

Any changes to this Privacy Policy in the future will be posted on this page and, where appropriate, notified to you by e-mail.

12. Contact Us

If you have any questions about the processing of personal data via this Website, please contact our Hartree Data Protection Group by email at GDPR@hartreepartners.com or by mail to Hartree Partners, LP of 1185 Avenue of the Americas, New York, NY 10036 for the attention of Hartree Legal (Data Protection Group). If you contact us, we will do our utmost best to address any concerns you may have about our processing of your personal data.