

Hartree Privacy Policy

Effective Date: 25 May 2018

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 you provide to us while visiting this website (“<http://www.hartreepartners.com/>”) (“**Website**”).

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 via our Website.

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

By visiting our Website, you are accepting the terms of this Privacy Policy. Any external links to other websites are clearly identifiable as such, and we are not responsible for the content or the privacy policies of these other websites.

2. Types of Information Collected

We may process your personal data when you request a good or service from us, we will collect your personal data in order to process your request and otherwise contact you following a purchase. The type of information we may collect from you may include contact details (including name, address, email address and telephone number) and employment details (including job title).

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 compliance with local legal and regulatory requirements and 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, 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 at any time unsubscribe by clicking on the “unsubscribe” link at the bottom of each marketing communication.

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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. Information about cookies

(a) Cookies and other similar technologies

A cookie is a small data file that is placed on your computer or mobile device by your web browser when you visit a website. It is a tool that stores information about website visits, recognizes you and your preferences each time you visit our website, and ensures website functionality and generally improving your experience of a website.

A cookie file can contain information such as a user ID that the site uses to track the pages you have visited, but the only personal data a cookie can contain is information you supply yourself. A cookie cannot read data off your hard disk or read cookie files created by other sites.

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.

You can find more information about cookies from these websites: www.allaboutcookies.org and www.aboutcookies.org.

(b) Cookies used on Website

We use other tracking technologies, such as third party tags. Please note that some parts of our Website use cookies which are applied by third parties (such as Google) over which we have no control. These cookies are likely to be analytical/performance cookies or targeting cookies and may include the following:

Cookie File	Description
APISID	Used by Google to store user preferences and information of Google maps
NID	Used by Google to store user preferences and information of Google maps
PREF	Used by Google to store user preferences and information of Google maps
SID	Used by Google to store user preferences and information of Google maps
HSID	Used by Google to store user preferences and information of Google maps

For further details on these cookies, please see <https://policies.google.com/technologies/types>.

You have the right to decide whether to accept or reject cookies. If you don't want to receive cookies, you can modify your browser so that it notifies you when cookies are sent to it or you can refuse cookies altogether. You can also delete cookies that have already been set. If you wish to restrict or block web

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browser cookies which are set on your device then you can do this through your browser settings; please visit your browser's help menu for further details. Please note that if you choose to reject cookies, doing so may impair some of our web site functionality.

6. Sharing your personal data

We may share your personal data with:

- our affiliated companies;
- Government bodies and agencies in the UK and overseas (for example, the Financial Conduct Authority) to comply with our legal and regulatory obligations;
- a prospective seller or buyer in the event of a sale or purchase of any Hartree Partners business or asset so that the buyer can continue to provide you with information and services;
- 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 authorised requests from government authorities or where required by law, including for national security. Where we are required by law, we may also disclose your personal data where it is necessary to enforce or apply our Website Terms, this Privacy Policy 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 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.

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.

8. Storing your Personal Data

Your personal data collected via our Website will be stored on servers located in an EU member state. It may also be processed by Hartree Partners staff in the United States 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 also share your personal data with service providers which may be located in a jurisdiction whose laws may not be the equivalent to your own jurisdiction. When we share your personal data with service providers, we will ensure contractual safeguards are in place to protect your personal data.

We have implemented appropriate safeguards, to protect your personal data when it is transferred. For access to copies of these agreements please contact the Hartree GDPR Team by email at GDPR@hartreepartners.com or by mail at Hartree Partners, LP of 1185 Avenue of the Americas, New York, NY 10036 for the attention of Legal (GDPR). We will process any request in line with any local laws and our policies and procedures.

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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 unauthorised 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 European Economic Area ('EEA'): You may have the right to: request (a) access 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.

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 us 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 Legal (GDPR). We will process any request in line with any local laws and our policies and procedures. If you are located in the EEA, you have the right to lodge a complaint about how we process your personal data with the supervisory authority in your country.

10. 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. Please check back frequently to see any updates or changes to this Privacy Policy.

11. Contact Us

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