

ASTERIA INVESTMENT MANAGERS PRIVACY NOTICE

This Privacy Notice is dated 23 November 2023.

At Asteria Investment Managers SA ("**Asteria IM**"), we respect your privacy and we are committed to protecting and safeguarding your Personal Data. We have developed policies and processes which are designed to provide for the security and integrity of your Personal Data. We are committed to Processing your Personal Data fairly and lawfully, and being open and transparent about such Processing.

1. Purpose of this Privacy Notice

This Privacy Notice explains how Asteria IM and Man Group plc ("**Man Group**"), its subsidiaries and its affiliates which are identified as Controllers in the table in Section 13 below (referred to collectively as "Man", "we", "us" or "our") process Personal Data about individuals outside our organisation with whom we interact, including but not limited to visitors to our website; clients and their personnel; vendors, service providers and other business contacts; visitors to our offices and tenants of our buildings; and registrants for Asteria IM's or Man Group events (together, "you").

Capitalised terms used in this Privacy Notice are defined in Section 15

This Privacy Notice may be updated from time to time and is available [here](#). Please regularly check this page to review any updates we might make to reflect changes in our practices or changes in applicable law and regulation.

Please note that this Privacy Notice only covers this website and does not regulate the privacy practices of third party websites which may be accessible through or linked to this website. References to "this website" in this Privacy Notice shall also be deemed to include <https://www.arcticdb.io>.

2. Processing your Personal Data

A. Collection of Personal Data

The Personal Data that we Process is collected or created from a variety of sources as follows:

When you provide us with your Personal Data	For example, you may do this when you register with us on our website, contact us via email, phone or by any other means.
When we create Personal Data in the ordinary course of managing and administering our business relationship with you	For example, we may create records of our interactions with you and details of your accounts with us or our accounts with you which may constitute Personal Data.
When you have chosen to make your Personal Data public	We may collect your Personal Data via social media to the extent that you choose to make your social media profile(s) publicly visible.

When we receive your Personal Data from third parties	<p>This could, for example, be from your employer or previous employer, our clients, our service providers or relevant legal and regulatory authorities.</p> <p>This might also include information obtained for the purposes of our “know your client” procedures (which include anti-money laundering processes, counter-terrorist financing procedures, politically exposed persons checks, and sanctions checks), background reference checks or other due diligence procedures.</p> <p>Such checks may be performed on you if you are connected with our clients, counterparties, service providers, investment opportunities, or we are considering employing you or otherwise establishing a business relationship.</p>
When you visit this website and when you register on this website	<p>For example, your device or browser may automatically disclose certain information (see <i>Electronic Identifying Data</i> in Section 2(B) below), some of which may constitute Personal Data.</p>

B. Types of Personal Data

In order to carry out the Processing activities set out in the table at Section 2(E) below, and where relevant to our relationship, the types of Personal Data that we Process include:

Personal Data Type	Examples
Identity Data	Your name (and in some cases proof of your name), username or similar identifier, marital status, title, date of birth or age, gender, signature and other similar information
Personal and business contact details	Your work or home address (and in some cases proof of address), phone, email, social media profile details and other similar information
Nationality or tax identification data	Your nationality, immigration and/or visa status, passport number(s), other government issued national identification number(s), place of birth, Green Card number(s), National Insurance number, tax residency and tax identification information, social security number(s), driving licence number(s), images of passports, driving licences or other proof of identity document(s) and other similar information
Family, life cycle and social circumstances	The name and contact details of next of kin, family members, emergency contact details, outside business interests such as hobbies or lifestyle choices that you include as part of your CV resume or other application document, dietary preferences and other similar information

Employment details	Your industry role, business activities, names of current and former employers, copies of your CV or resume and other similar information
Education and qualification data	Details of your education, professional and other qualifications, skills, experience and other similar information
Financial data	Your bank account details, tax calculations and/or returns, history of investment holdings and transactions, credit checks and other similar information
Communications data	Copies of communications with you, information about your use of our information and communications systems (where relevant) and copies of electronic communications and voice records (where relevant) made on our systems and other similar information
Transaction data	Details about payments to and from you, travel and other expenses and other similar information
Photos and CCTV images	Photographs that you provide or we obtain from publicly available sources, CCTV images from our office locations and other similar information
Electronic identifying data	IP addresses, cookies, activity logs, online identifiers, unique device identifiers, geolocation data and other similar information

C. Sensitive Personal Data

We do not seek to collect or otherwise Process your Sensitive Personal Data, except where:

- the Processing is necessary for compliance with a legal or regulatory obligation (including anti-money laundering processes, counter-terrorist financing procedures, sanctions checks, politically exposed persons checks and, where relevant, political contribution checks which may include information about your political opinions or Criminal Offences Data);
- the Processing is necessary for the detection or prevention of crime (including the prevention of fraud) to the extent permitted by applicable law or regulation;
- you have made such Sensitive Personal Data public;
- the Processing is necessary for the establishment, exercise or defence of legal rights;
- the Processing is necessary for reasons of substantial public interest and occurs on the basis of an applicable law or regulation that is proportionate to the aim pursued and

provides for suitable and specific measures to safeguard your fundamental rights and interests; and

- we have in accordance with applicable law and regulation, obtained your explicit consent prior to Processing your Sensitive Personal Data (it should be noted that this legal basis is only used in relation to Processing that is entirely voluntary – it is not used for Processing that is necessary or obligatory in any way).

D. Criminal Offences Data

We will only Process Criminal Offences Data to the extent required or permitted by applicable law or regulation. Where appropriate, this includes Personal Data received by Man from background screening providers, which may include:

- Personal Data obtained as a result of sanctions, regulatory and law enforcement list screening; and
- details about any criminal convictions and offences (actual or alleged) that relate to you.

E. Purposes for which we may Process Personal Data

We will only Process your Personal Data when the law allows us to. Most commonly, we will Process your Personal Data where it is necessary for our legitimate interests, and your interests and fundamental rights do not override these. This means that we Process your information for purposes such as:

- for the provision of investment / asset management and ancillary services;
- for anti-money laundering, anti-bribery, “know your client” and other due diligence processes;
- to onboard new business relationships;
- to manage our relationship with you efficiently;
- to allow us to effectively and efficiently manage and administer the operation of our business, including the management of our properties and offices;
- for the prevention of fraud; and
- for managing risks to which our business is exposed.

Other common circumstances where we use your Personal Data are:

- Where we need to perform our obligations under the contract we have entered into with you.
- Where we need to comply with a legal or regulatory obligation.

On rare occasions, we may also use your Personal Data in the following situations:

- Where we need to protect your vital interests (or someone else’s interests).
- Where it is needed in the public interest.

There may be other occasions where we ask you for your consent for the Processing of your Personal Data, on such occasions we will only use your Personal Data for the purposes which we will explain at that time.

More specifically, we may Process your Personal Data in the following situations (please note that not all Processes will be relevant to you and your relationship with Man and some of these purposes may overlap):

Investment / asset management services	<ul style="list-style-type: none"> • To enable us to effectively carry out our function as investment / asset manager; and • to provide ancillary services to you.
Anti-money laundering, anti-bribery, “know your client” and other due diligence processes	<ul style="list-style-type: none"> • To fulfil our regulatory and legal obligations relating to the prevention of money laundering, anti-bribery, fraud prevention, counter-terrorist financing, politically exposed persons checks, sanctions, regulatory and law enforcement checks and any other “know your client” checks. • We may use third party services, such as the administrators of the funds managed by Asteria IM / Man Group entities or third party screening service providers to help with these Processes. • This includes confirming and verifying your identity, and screening against lists maintained by a third party which assists with this process (such as sanctions lists from governments around the world, as well as other information about individuals on this list which may include information about criminal convictions or political opinions, which has been obtained from publicly available sources, such as newspapers and company registrars).
New business onboarding	<ul style="list-style-type: none"> • To onboard new business relationships and comply with our internal policies and procedures.
Administration of any interests you may hold in Asteria IM	<ul style="list-style-type: none"> • To enable Asteria IM and its registrar to administer your investment in shares in Asteria IM; and • to maintain our shareholders’ register.
Provision of products and services to you	<ul style="list-style-type: none"> • To provide products and services you have requested; • to provide you with any information relating to such products or services; and • to respond to any comments you may send us.

Relationship management	<ul style="list-style-type: none"> • To enable us to efficiently manage our relationship with you or your business; • to keep our records up to date; • to maintain records of services provided and our interactions with you; and • to respond to any complaints we may receive from you and to seek to resolve these.
Manage service provider and distributor or intermediary relationships	<ul style="list-style-type: none"> • To enable us to manage how we work with other companies that provide services to us, the funds we manage and the investors in our funds.
Product development	<ul style="list-style-type: none"> • To assist in the development of new products and services.
Research	<ul style="list-style-type: none"> • To conduct market, client or investment research; and • to engage with you for the purpose of obtaining your views on our services, products and events.
Business and financial management	<ul style="list-style-type: none"> • To run our business in an efficient and proper manner, including managing our financial position, business capability, planning, communications, corporate governance (such as company registers and other company secretarial functions), audit, insurance, sales, event organisation and vendor management; • to enable third parties to provide us (or our clients or prospective clients) with services; • to respond to client due diligence requests; • to investigate and respond to client complaints; and • to manage the performance and security of our equipment, IT systems and electronic platforms, including administering access rights.
Risk management	<ul style="list-style-type: none"> • To effectively operate our audit, compliance controls and other risk management functions.
Legal, regulatory and compliance	<ul style="list-style-type: none"> • To operate effectively our legal, regulatory and compliance processes, including but not limited to those that relate to the maintenance of regulatory registrations and conflicts of interest management.

Investigations	<ul style="list-style-type: none"> • To detect, investigate and prevent breaches of legal obligations or internal and regulatory policies; and • to detect, investigate and prevent the commission of criminal offences, in each case in accordance with applicable law and regulation.
Fraud prevention	<ul style="list-style-type: none"> • To detect, prevent and investigate fraud or potential fraudulent activity.
Legal proceedings	<ul style="list-style-type: none"> • To establish, exercise or defend our legal rights.
Operation of Asteria IM's website and IT operations	<ul style="list-style-type: none"> • To operate and support Asteria IM's website; • to process your registration on Asteria IM's website; • to communicate and interact with you via Asteria IM's website; • to manage our IT systems and operations; and • to operate our IT security and audits.
Security	<ul style="list-style-type: none"> • To provide for physical security of our premises, staff, tenants of or visitors to those premises (including records of visits to our premises and CCTV recordings) and electronic security (including login records and access details, where you access our electronic systems).
Health and safety	<ul style="list-style-type: none"> • To perform health and safety assessments and recordkeeping; and • to comply with related legal obligations.
Marketing and event planning For more information in relation to our direct marketing activities, please see Section 3 below.	<ul style="list-style-type: none"> • To provide you with information concerning features, services, products, fund launches, corporate events and related information.
Suitability and appropriateness	<ul style="list-style-type: none"> • To determine your suitability to be granted access to Asteria IM's website; • to determine your eligibility for investment in the funds managed by Asteria IM; and • to satisfy other regulatory suitability and appropriateness requirements.

Should you require any further information in relation to the purpose for which we Process your Personal Data or our legal basis for doing so, please contact us using the contact details at Section 12 below.

3. Direct Marketing

We may Process your Personal Data to contact you by mail and email and on occasion by telephone, in order to provide you with information concerning features, services, products, fund launches, corporate events and related information from Asteria IM or any other entities within the Man Group that may be of interest to you, in accordance with applicable law and regulation. Additionally, we will also be Processing your Personal Data to maintain and update your contact information where appropriate.

Depending on our relationship with you, we may be required under applicable privacy and electronic communications regulations to request your prior consent to this type of Processing. Where we do ask you to consent, such consent will only apply to direct marketing communications from us and not communications for the purposes of any services we provide to you or in response to your queries.

Where we are not required to seek your consent under applicable law and regulation, we have a legitimate interest in Processing your Personal Data for the purposes of conducting marketing and prospecting, unless your interests outweigh these interests. If you do not wish to receive marketing communications from us you can opt out at any time by contacting us via the details provided in Section 112, or by electronically unsubscribing from emails we have sent to you.

After you unsubscribe, we will not send you further promotional emails, but we may continue to contact you to the extent necessary for the purposes of any services you have requested, responding to your queries or if we are required to process your Personal Data pursuant to applicable law and regulation, such as responding to government or regulatory queries.

4. Disclosure of Personal Data to third parties

We share your Personal Data with Asteria IM's staff and entities within Man Group for the business purposes described above, such as providing services to you and operating this website.

In addition, we may disclose your Personal Data in accordance with applicable law and regulation to:

- Governmental, legal, regulatory, tax or similar authorities, ombudsmen, central and/or local government agencies; and/or law enforcement officials (if mandated by law and regulation or if required for the protection of our legitimate interests);
- anti-fraud services in relation to data on known or suspected fraudulent activity;
- third party service providers who Process Personal Data on behalf of Asteria IM in the provision of activities in the ordinary course of business, including but not limited to: providers of website hosting and maintenance, provision of website analytics and online advertising;
- third parties to whom you request us to send your Personal Data;
- third party Processors (such as payment services providers and banks);
- our professional advisers (such as our auditors, accountants, financial advisers and lawyers);
- entities within the Man Group or subcontractors to which certain duties have been delegated;

- any relevant party, claimant, law enforcement agency or court, to the extent necessary for the establishment, exercise or defence of legal rights in accordance with applicable law and regulation;
- any relevant party for the purposes of prevention, investigation, detection or prosecution of criminal offences or the execution of criminal penalties, including safeguarding against and the prevention of threats to public security in accordance with applicable law and regulation;
- to any relevant party in connection with our anti-money laundering, anti-bribery, anti-fraud or “know your client” requirements (including third party service providers which carry out sanctions checks on our behalf). Such service providers may also keep Personal Data which we provide, or which you provide to them direct, in order for them to provide identity verification services to other organisations; and
- any relevant third party acquirer(s), in the event that we sell or transfer all or any relevant portion of our business or assets (including in the event of a reorganisation, dissolution or liquidation) or the assets or business of our funds.

We do not share your Personal Data with others for marketing purposes unless you agree to this.

5. Transfers of Personal Data outside the European Economic Area, the United Kingdom, Switzerland, Jersey and Guernsey

Due to the international nature of this website and the nature of Asteria IM's / Man Group activities and the service providers we use, your Personal Data may be collected, transferred and stored in any country worldwide, including but not limited to countries in which Asteria IM / Man Group or their sub-contractors conduct their business activities. Some of these countries may not have been deemed by the relevant data regulators to have the same level of protection as countries in respect of which EEA, United Kingdom, Swiss, Jersey or Guernsey data protection law applies.

We ensure that such transfers are protected by appropriate safeguards or are otherwise permitted under applicable law. Where we transfer your Personal Data to a country outside of the EEA, the United Kingdom, Switzerland, Jersey and Guernsey, this can be done in the following ways:

- The country to which the Personal Data is transferred may be approved under the adequacy decisions of the relevant supervisory authority;
- the recipient may have agreed to standard contract clauses that require them to protect the Personal Data;
- the recipient uses Binding Corporate Rules which are approved by relevant supervisory authorities and require them to protect the Personal Data; or
- in other circumstances, the law may permit us to otherwise transfer your Personal Data outside the EEA, the United Kingdom, Switzerland, Jersey and Guernsey.

You may obtain more details of the safeguards in place to protect your Personal Data when it is transferred outside the EEA, the United Kingdom, Switzerland, Jersey and Guernsey, including a copy of such safeguards by contacting us via the details provided in Section 12.

6. Data Retention

How long we hold your Personal Data will vary. The retention period will be determined by various criteria, including the purposes for which we are Processing your Personal Data (as it will need to be kept for as long as is necessary for such purpose), legal and regulatory obligations (which may set a minimum period for which we have to keep your Personal Data) and our internal policies, which take into consideration the purpose for which we hold the Personal Data.

7. Security of your Personal Data

We have extensive controls in place to maintain the security of our information and information systems. Appropriate controls (such as restricted access) are placed on our computer systems. Physical access to areas where Personal Data is gathered, processed or stored is limited to authorised staff. We operate layers of safeguards and defences designed to ensure that Asteria IM is able to operate safely. Amongst other things, such controls are designed to detect, respond and recover in case of any adverse events that may arise.

8. Your rights

You have a number of legal rights in relation to the Personal Data that is held about you by us, including:

- You have a right to obtain certain information regarding the Processing of the Personal Data and to access your Personal Data.
- If your Personal Data is inaccurate or incomplete, you have the right to request corrections to it.
- In certain circumstances, you have the right to receive some Personal Data in a structured, commonly used and machine-readable format.
- You have the right to ask us to transfer some of your Personal Data to other organisations, where this is technically feasible. Please note that this right only applies to Personal Data which you have provided to us.
- You have a right to ask us to erase or “restrict” your Personal Data in some circumstances. Please note that there may be circumstances where you ask Asteria IM to erase your Personal Data but we are nevertheless legally entitled to retain it.
- Where we Process your Personal Data because the Processing is in our, or a third party’s, legitimate interests, then you may object to this Processing. Please note that there may be circumstances where you object to, or ask Asteria IM to restrict its Processing of your Personal Data but we are legally entitled to continue Processing your Personal Data or to refuse that request.
- In the limited circumstances in which we have asked for your consent to Process your Personal Data for a specific purpose, you may withdraw your consent at any time. Once we have received notification that you have withdrawn your consent, we will no longer process your Personal Data for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

These rights may be limited, for example, if fulfilling your request would reveal Personal Data about another person, or if you ask us to delete information which we are required by law and regulation to keep or have compelling legitimate interests in keeping.

You also have a right to complain to a supervisory authority for data protection. This may either be the supervisory authority in the place of your habitual residence, your place of work, or the place where you consider that there has been a breach of data protection law.

To exercise any of these rights, please use the contact details provided in Section 12.

9. Your duties

Where our business relationship is with a corporate entity, we will Process Personal Data about such entity's directors, officers, employees and ultimate beneficial owners.

If you have received this Privacy Notice on behalf of such a corporate entity, you must inform your directors, officers, employees and ultimate beneficial owners (as appropriate) that Asteria IM Processes their Personal Data as well as the purpose for which we Process it.

10. Cookies

Like many websites, we may also use cookies. A cookie is a piece of data stored on a user's hard drive containing information about a user's use of a website. We use cookies in order to make the website work, or work more efficiently, as well as to provide information to us. We use the following cookies:

- **"Session based" cookie.** This is essential for parts of the website to operate and has already been set. It is used to maintain the state of a user's actions so as not to constantly request the same information from them within a "session".
- **"Essential" cookie.** This is essential for parts of the website to operate – for example, it lets us know that you have completed page 1 of a form and that we should now serve page 2.
- **"Remember me" cookie.** This is a permanent cookie which can remember who you are once you have logged into the website so you are not asked to log in again for future visits. You will be asked for your consent before agreeing to the use of this function.
- **"Analytics" cookie.** This is used to collect information about how you use our site, such as where you have come to the site from and which website pages you have visited. We use the information to help us improve the website.
- **"Advertising" cookie.** This is used to show adverts that are more relevant to your interests. For example, advertising cookies may include cookies placed by third party advertising networks to group you with other users into interest groups and show you advertisements likely to be of interest to those groups. These cookies also help to limit the number of times that you see an advertisement as well as to help measure the effectiveness of advertising campaigns and to allow us to pay advertisers. The cookies remember you have visited a website and this information is shared with other organisations such as advertisers.

You can enable or disable cookies by modifying the settings in your browser; however, you may not be able to use all of the features of the website if cookies are disabled. It is not technically possible for your settings to be carried with you between your browsers and devices. As such, you will need to make your preferred changes to these settings from each browser you use. You can find out how to disable/enable cookies at: www.allaboutcookies.org.

11. Third Party Cookies

When you use the website, you may receive cookies that are set by third parties, including e.g. Google, for the purposes described above. We do not control the setting of these third

party cookies. In the event you require more information about the use of these third party cookies and how to manage them, we suggest you review the relevant third party websites listed below.

HOST	TYPE	THIRD PARTY	PRIVACY POLICY
Google.com	Advertising	Google Ireland Limited	Google
Linkedin.com	Advertising	LinkedIn Corporation	LinkedIn
Twitter.com	Advertising	Twitter, Inc.	Twitter

12. Contact Details

For electronic communications, please contact:

Contact	Issue
privacy@man.com	If you have any questions, concerns or wish to exercise your rights set out in Section 8.
DPincident@man.com	If you believe there is a potential data protection breach and wish to inform us of such breach.
esupport@man.com	If you want to amend your website registration details or your preferences, please let us know and we will correct, update or remove your details.

All written communications should be directed to:

Man Group
Data Protection
Riverbank House
2 Swan Lane
London EC4R 3AD
United Kingdom

13. Controllers

Controller entity	Address
Asteria Investment Managers SA	Rue de Lausanne 15, 1201 Geneva, Switzerland
Man Group plc	22 Grenville Street, St Helier, Jersey JE4 8PX, Channel Islands

Man Group Treasury Limited	22 Grenville Street, St Helier, Jersey JE4 8PX, Channel Islands
AHL Partners LLP	Riverbank House, 2 Swan Lane, London EC4R 3AD, United Kingdom
Financial Risk Management Limited	Riverbank House, 2 Swan lane, London, EC4R 3AD, United Kingdom
FRM Investment Management Limited	PO Box 173, Royal Chambers, St Julian's Avenue, St Peter Port, Guernsey, GY1 4HG, Channel Islands
GLG Partners LP	Riverbank House, 2 Swan Lane, London EC4R 3AD, United Kingdom
Man (Europe) AG	Austrasse 56, 9490 Vaduz, Liechtenstein
Man Asset Management (Ireland) Limited	70 Sir John Rogerson's Quay, Dublin 2, Ireland
Man Fund Management Guernsey Limited	PO Box 173, Royal Chambers, St Julian's Avenue, St Peter Port, Guernsey, GY1 4HG, Channel Islands
Man Fund Management UK Limited	Riverbank House, 2 Swan Lane, London EC4R 3AD, United Kingdom
Man Global Private Markets (UK) Limited	Riverbank House, 2 Swan Lane, London EC4R 3AD, United Kingdom
Man Group Investments Limited	Riverbank House, 2 Swan Lane, London EC4R 3AD, United Kingdom
Man Group Japan Limited	PO Box 173, Royal Chambers, St Julian's Avenue, St Peter Port, Guernsey, GY1 4HG, Channel Islands
Man Group Operations Limited	Riverbank House, 2 Swan Lane, London EC4R 3AD, United Kingdom
Man Group Services Limited	Riverbank House, 2 Swan Lane, London EC4R 3AD, United Kingdom
Man Group UK Limited	Riverbank House, 2 Swan Lane, London EC4R 3AD, United Kingdom
Man Investments (CH) AG	Huobstrasse 3, 8808 Pfäffikon SZ, Switzerland
Man Investments AG	Huobstrasse 3, 8808 Pfäffikon SZ, Switzerland
Man Solutions Limited	Riverbank House, 2 Swan Lane, London EC4R 3AD, United Kingdom

Numeric Investors LLC	470 Atlantic Avenue, 6 th Floor, Boston, MA 02210
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14. EEA, United Kingdom, Swiss, Jersey and Guernsey Data Regulators

You can find out more information about your rights by contacting the EEA data regulator in your jurisdiction, or the jurisdiction of the relevant Controller which in Ireland is the Data Protection Commission (website at dataprotection.ie), or the UK's Information Commissioner's Office (website at <https://ico.org.uk>), the Swiss Federal Data Protection and Information Commissioner (website at <https://edoeb.admin.ch/>) the Jersey Office of the Information Commissioner (website at <https://jerseyoic.org/>) or the Guernsey Office of the Data Protection Commissioner (website at <https://dataci.gg>).

15. Defined Terms

Term	Definition
Binding Corporate Rules	A set of legally enforceable rules authorising Personal Data transfers to non-EEA based controllers or processors.
Controller	The entity that decides how and why Personal Data is Processed. In many jurisdictions, the Controller has primary responsibility for complying with applicable data protection laws.
Criminal Offences Data	Information about criminal convictions and offences (actual or alleged), including reports from the Disclosures and Barring Service and other similar information.
Man Group	(i) Man Group plc; (ii) any company or other entity which directly or indirectly controls, is controlled by or is under common control with Man Group plc (including any holding company or subsidiary, each within the meaning of section 1159 of the Companies Act 2006); and (iii) any limited partnership or limited liability partnership whose general partner or managing member is an entity in (ii) above, but excluding any investment fund in relation to which Man Group plc or an entity or partnership in (ii) or (iii) above provides investment management, advisory, marketing or related services.
Personal Data	Information that is about any individual, or from which any individual is identifiable.
Process or Processed or Processing	Anything that is done with any Personal Data, whether or not by automated means,

	such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure, or destruction.
Processor	Any person or entity that Processes Personal Data on behalf of the Controller (other than employees of the Controller).
Sensitive Personal Data	Personal Data about race or ethnicity, political opinions, religious or philosophical beliefs, trade union membership, physical or mental health, sexual life or orientation, genetic or biometric or any other information that may be deemed to be sensitive under applicable law.