



Privacy Notice

This regulatory notice is solely for your information. You do not need to take any action in relation to it.

This Notice was updated on 03 September 2025.

Introduction

Tyndall Investment Management, a trading name of Odd Asset Management Limited (“the firm, we, us, our”) are the ‘data controller’ in relation to your personal data that we hold, because we control the storage and use of that personal data. TIM is committed to safeguarding the privacy of the personal data we collect and process. This Privacy Notice forms part of our commitment to be open and fair with all individuals whose personal data we process and to provide details around how we process such personal data and what we do with it.

For example, as part of our customer onboarding process, we will collect your personal data, such as your name, address, telephone number, email address, financial information, employment details and passport details. This information is used to verify your identity and, where necessary, to assess your creditworthiness for the service you have requested.

We do this as part of our legal obligations as a regulated provider of financial services and to safeguard our business and our clients from fraud and other criminal activity.

TIM has appointed a member of staff with responsibility for data protection matters, who can be contacted via emailing compliance@tyndallim.co.uk.

Background

The General Data Protection Regulation (“GDPR”) sets out what organisations can and cannot do with your personal data. ‘Personal data’ is information that identifies individuals directly or from which individuals can be identified indirectly. It is designed to give individuals greater control over their personal data and to ensure that organisations handle that data in a lawful, fair, and transparent manner.

As a regulated firm, we are committed to complying with GDPR and the UK Data Protection Act 2018, ensuring your personal information is protected, used responsibly, and only for legitimate business purposes.

Purpose

One of the requirements of GDPR is that we provide you with details about how we process your personal data. ‘Processing’ includes obtaining, recording or storing personal data and carrying out any tasks using the personal data. This notice also describes your data protection rights, including a right to object to some of the processing which we carry out.



Your rights

Under the GDPR you have the following rights:

- Right of access: To obtain access to, and copies of, the personal data that we hold about you;
 - Right to be informed: to know how we collect, use and store your personal data
 - Right to object: to object to the processing of your personal data for certain purposes, including direct marketing communications.
 - Right to erasure: To require us to erase your personal data;
 - Right to restrict processing: To require us to restrict our data processing activities;
 - Right to data portability: To receive from us the personal data we hold about you which you have provided to us, in a reasonable format specified by you, including for the purpose of you transmitting that personal data to another data controller;
 - Right to rectification: To require us to correct the personal data we hold about you if it is incorrect; and
- Rights in relation to automated decision-making and profiling: to not be subject to decisions made solely by automated means without meaningful human involvement, where this has legal or significant effects on you.

Please note that the above rights are not absolute, and we may be entitled to refuse requests where exceptions apply.

If you have any questions about how we use your personal data, or you wish to exercise any of the rights set out above, please contact our Compliance Officer using the following email: compliance@tyndallim.co.uk. or by writing to Tyndall Investment Management at:

5-8 The Sanctuary
Westminster
London
SW1P 3JS

Private client investment management: clients of the firm

Data Processing

We process our clients' personal data for a number of different purposes such as managing your assets, understanding your aims and objectives, reporting to you on the services we provide, for verifying your identity and carrying out regulatory checks, in order to compile regulatory returns, for complying with various laws and regulations to which we are subject, to keep in contact with you and to invite you to events or meetings which may be of interest to you and for obtaining information in relation to your use of our website.

Under the existing agreements we have in place with your custodian bank and investment administrators (such as Pershing Securities Limited and Raymond James Investment Services Limited) we will share and process information with these nominated 3rd parties.

Lawful grounds

There are a number of reasons why we process your personal data. Our primary objective for doing so is that it enables the firm to manage your assets. The lawful grounds for the firm to process your



data is that it is necessary for the performance of our contract with you. It is therefore necessary for compliance with a legal obligation and for the purpose of our legitimate interests.

Our specific legitimate interests served by the processing also include ensuring our services are compliant with our regulatory obligations and to ensure that we provide the best possible client service including the administration of your portfolio.

The lawful grounds relating to the provision of reporting to you are that it is necessary for the performance of our contract with you and is necessary in order to comply with our contract with you and is necessary to satisfy a legal obligation and it is necessary for the purpose of our legitimate interests. Our specific legitimate interests served by the processing include ensuring our services are provided in a regulatory compliant manner and ensure that we provide the best possible client service.

Verifying your identity and carrying out regulatory checks

The lawful grounds for processing are that it is necessary for compliance with a legal obligation and it is necessary for the purpose of our legitimate interests. Our specific legitimate interests served by the processing include the prevention of fraud and other financial crime and for ensuring that our services comply with the relevant regulatory requirements.

Regulatory reporting

The lawful grounds for processing are that it is necessary for the performance of our contract with you and enables us to comply with our regulatory obligations and it is necessary for the purpose of our legitimate interests. We have a legitimate interest in ensuring our services are delivered in a regulatory compliant manner.

Adherence to regulatory requirements

The lawful grounds for processing are that it is necessary for the performance of our contract with you and for compliance with a legal obligation and regulatory requirements and therefore it is necessary for the purpose of our legitimate interests. We have a legitimate interest in ensuring our services are delivered in a regulatory compliant manner.

Understanding your aims and objectives

The lawful grounds for processing are that it is necessary for the performance of our contract with you and therefore it is necessary for the purpose of our legitimate interests. Our specific legitimate interests served by the processing include ensuring that your investments are suitable for your needs, you are provided with the best possible client service.

Inviting you to meetings and other events which we think may be of interest to you

The lawful ground for processing is that it is necessary for the purpose of our legitimate interests. Our specific legitimate interests served by the processing include ensuring that you receive the best possible client service from us.

Obtaining information in relation to your use of our website

The lawful ground for processing is that it is necessary for the purpose of our legitimate interests. Our specific legitimate interests served by the processing include understanding how our website is used in order that we can improve its content and for enhancing ensuring our network and information security.



Private client investment management: potential clients

Data Processing

Where you provide us with your data, including name, address, telephone numbers, email addresses, date of birth, financial circumstances and portfolio information, we will process this information in order to recommend the most appropriate service to you, to keep in contact with you and to invite you to events or meetings which may be of interest to you and for obtaining information in relation to your use of our website.

Lawful grounds

There are a number of reasons why we process your personal data. The lawful grounds for the firm to process your data is that it is necessary for the purpose of our legitimate interests.

Our specific legitimate interests served by the processing also include ensuring that any and all services that we propose are compliant with our regulatory obligations.

Verifying your identity and carrying out regulatory checks

The lawful grounds for processing are that it is necessary for compliance with a legal obligation and it is necessary for the purpose of our legitimate interests. Our specific legitimate interests served by the processing include the prevention of fraud and other financial crime and for ensuring that our services comply with the relevant regulatory requirements.

Understanding your aims and objectives

The lawful grounds for processing are that it is necessary for the purpose of our legitimate interests. Our specific legitimate interests served by the processing include ensuring that your proposed investments are suitable for your needs, you are provided with the best possible client service.

Inviting you to meetings and other events which we think may be of interest to you

The lawful ground for processing is that it is necessary for the purpose of our legitimate interests. Our specific legitimate interests served by the processing include marketing, where you have given your consent to be contacted and/or asked to be kept up to date with our investment thoughts, service, or activities.

Obtaining information in relation to your use of our website

The lawful ground for processing is that it is necessary for the purpose of our legitimate interests. Our specific legitimate interests served by the processing include understanding how our website is used in order that we can improve its content and for enhancing ensuring our network and information security.

Fund management: direct investors

If you invest directly into funds managed by the firm, we may receive and record your name. This situation is unusual, as most investors invest via a platform or investment management service, in which case we would not see or record your name.

In the event that we do see your name, we may retain your name for the purpose of our legitimate interests but will not otherwise process or share your name with 3rd parties, excepting where we receive your name from that third party.



Business contacts

We may also receive personal data in respect of our business contacts and (current, previous and/or potential) service providers (and employees of service providers) and data subjects that have provided a business card to, or have otherwise corresponded with, an employee of the firm.

We may collect, use, store and transfer different kinds of personal data about you which you provide to us including: name, address, email address, telephone numbers, place of work and job title.

We will process this information where it is necessary for our legitimate interests, or those of a third party such as the funds we manage, custodians or administrators (including in relation to the sending of electronic marketing communications) and where your interests and fundamental rights are not overridden or where we need to comply with a legal or regulatory obligation.

Your personal data may be processed by the firm or its sub-processors (or any of their affiliates, agents, employees, delegates or sub-contractors) for the following purposes:

- to hold your personal data on our system and to contact you on the basis of the legitimate interests of the firm and/or the funds managed by the firm (including in connection with using the services that you provide);
- in respect of suppliers, to allow us to process payments and orders in respect of any goods and services provided;
- to send you updates on the performance of the firm and funds which it manages, including newsletters, invitations to events and other electronic marketing communications which we will do (a) on the basis of our legitimate interests if you are an investor in the Fund or if we are sending electronic marketing communications to corporate subscriber email addresses (eg name@company.com) or (b) with your consent;
- to comply with legal or regulatory requirements; and
- such other actions as are necessary to manage the activities of the firm, including by processing instructions, monitoring and recording electronic communications (including telephone calls and emails) for quality control, analysis and training purposes and enforcing or defending the rights or interests of the firm, in order to comply with its legal obligations and/or to pursue its legitimate interests.

Providing and withdrawing consent

We may use and process your personal information where you have consented for us to do so in connection with our marketing activities.

You may withdraw your consent for us to use your information in this way at any time. To do so please contact our Compliance Officer at compliance@tyndallim.co.uk.

Sharing of personal data

Where relevant, the firm may pass your personal data to third parties on whose services we rely in order to be able to provide services to you. These include: custodians, market counterparties, brokers, banks, fund operators, administrators, software providers, professional advisers, lawyers, auditors, registrars, regulatory or tax authorities.

Transfer of information outside of the EU

Third parties whose services we use may transfer your personal data to other third parties who in turn they use to provide their services to us. We ask such third parties to put in place appropriate



safeguards where this involves a transfer of personal data outside of the UK and the EU. Further details are available on request.

Data retention

We will only retain your personal data 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 (including the terms of any contractual arrangement we have in place). To determine the appropriate retention period, 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 data and whether we can achieve those purposes through other means, and the applicable legal requirements.

We will take all reasonable steps to destroy, or erase from our systems, all personal data which is no longer required.

Please note that you may contact us at any time at compliance@tyndallim.co.uk and ask for your details to be removed.

How to contact us

If you have any questions about this Notice please contact our Data Protection Officer at compliance@tyndallim.co.uk.