



## Campbell GDPR Notice

### Introduction & Scope

This notice relates to the processing of personal data of natural persons who reside in the European Union, as that term is defined under the EU General Data Protection Regulation 2016/679 (“GDPR”), by Campbell & Company, LP and its affiliates (“Campbell”).

The purpose of this notice is to inform you why and how Campbell handles your personal data. Campbell may process your personal data if:

- You are an investor in a Campbell fund, Campbell provides services to you, or you are an individual connected with the entity which invested in a Campbell fund or which entered into a trading advisory services agreement with Campbell (each, a “Client”).
- You are a prospective Client of Campbell.
- You are a service provider to Campbell or one of its Clients.
- You visited a Campbell website, including [www.Campbell.com](http://www.Campbell.com).
- You are a current or prospective Campbell employee.
- You are not in one of the above categories, but you interact with Campbell in some capacity (e.g. you are connected with a legal, regulatory, or self-regulatory organization).

### Personal Data Processing

Campbell is considered a personal data “controller” under the GDPR because it determines the purpose and means of processing your personal data. Campbell is also a personal data “processor” under the GDPR because it collects and uses your personal data. Campbell may also delegate certain personal data processing activities to its service providers, which are considered third party processors under the GDPR.

Campbell believes it has one or more of the following lawful bases for processing your personal data:

- Consent – you may have consented to Campbell processing your personal data by agreement or by using Campbell’s website.
- Contractual necessity – Campbell may need to process your personal data to provide or receive services pursuant to an agreement between you



and Campbell. In particular, if you are an investor in a Campbell fund, Campbell processes your personal data for purposes such as maintaining investor registers, administering investor capital activity, and complying with reporting obligations to you and regulators.

- Compliance with legal requirements – Campbell is subject to the regulation and oversight of many regulatory authorities in various jurisdictions. For example, Campbell may be required to process your personal data in order to comply with U.S. anti-money laundering laws and regulations.

Campbell processes your personal data which may be:

- Provided by you in person, in writing, via email, or by telephone.
- Collected or generated in relation to investments in Campbell funds or the provision of trading advisory services by Campbell, including Campbell fund subscription applications and due diligence questionnaires.
- Obtained from third parties such as an entity you are connected with, background check providers, and databases.
- Collected using cookies and other technologies when visiting a Campbell website.
- Obtained from public sources such as websites and regulatory filings.

Campbell may process the following kinds of your personal data:

- Identification information and documentation – including your name, date of birth, citizenship, passport, driver's license, taxpayer identification number, and social security number.
- Contact information – including your email, mailing address, and phone/fax number.
- Other information – including your Campbell fund account number, bank account number, Campbell fund transaction history, background check information, signature, website usage data, IP address, location data, and cookies.

Campbell may use your personal data to:

- Communicate with you and to retain records of such communication.

- Conduct business development and marketing activities such as providing you with information about Campbell funds, portfolios, research, and events.
- Assess your eligibility to invest in Campbell funds or receive our trading advisory services and carry out know-your-client procedures.
- Administer your investments in Campbell funds or our provision of trading advisory services to you.
- Carry out due diligence on Campbell service providers and administer service provider relationships.
- Comply with any legal, regulatory, or self-regulatory requirement that applies to Campbell.
- Administer and optimize for your viewing any Campbell website.

Campbell will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another purpose which is compatible with the original purpose. If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis for such use.

Campbell is committed to protecting the security and integrity of your personal data. Campbell implements commercially reasonable safeguards and controls to ensure that any personal data you share with Campbell is protected against unauthorized access and misuse. Campbell also obtains written representations from third party personal data processors that they will implement safeguards to ensure the confidentiality and security of your personal data.

Campbell may be required under various laws and regulations to maintain your personal data for a mandated time period. Campbell may, however, retain your personal data indefinitely.

### **Personal Data Rights**

You have the following rights under the GDPR with respect of Campbell's processing of your personal data:

- Right to be informed – you have the right to be informed about your personal data that we collect and how we process it.
- Right to access and portability – you have the right to obtain copies of your personal data that we process.

- Right to rectification – you have the right to request that we correct any inaccuracy or incompleteness in your personal data we process.
- Right to erasure – you have the right to request that we delete your personal data.
- Right to restrict or object – you have the right to object to or to ask us to restrict the processing of your personal data in certain circumstances, such as when you contest the accuracy of your personal data.
- Right to withdraw consent – you may withdraw your consent for us to process your personal data at any time.

The rights identified above are subject to certain conditions and exemptions, which if they apply, may permit Campbell to refuse a particular request. Further, if no such exemption or condition applies and Campbell complies with a particular request, Campbell may not be able to provide or continue providing services to you.

### **Miscellaneous**

We may update this notice at any time. We may also notify you in other ways from time to time about our use of your personal data.

If you have any questions about this notice or how we use your personal information, or if you wish to exercise any of your rights, please email [Legal@Campbell.com](mailto:Legal@Campbell.com).