

# ClearGlass

## DATA POLICY

This policy describes how we use the information we collect to support and run ClearGlass Analytics Limited ("ClearGlass") ("we"/"us"/"our"). You can read how we process your personal data to comply with the General Data Protection Regulation (GDPR) [here](#).

### WHAT KIND OF INFORMATION WE COLLECT ?

We collect and process the following information:

1. Information about the pension fund(s) you either own or manage;
2. Data required by the industry standard templates (including IA and IDWG; this may include more templates in the future);
3. Information on the mandates/funds in your portfolio; and
4. Data from your usage of the ClearGlass dashboard

### HOW WE USE THE INFORMATION WE COLLECT ?

In order to be completely transparent, and acknowledging the fact that the information we collect can be of a sensitive nature, we want to assure you of the things we will and will not do with your information.

#### **We will use the information we collect to:**

1. Provide and improve our Services, including:
  - a. summarising the data according to the IDWG User Template by mandate/product and across mandates for a particular Asset Owner;
  - b. providing basic reporting to Asset Owners;
  - c. creating algorithms to 'Sense Check' and create tolerances to provide better reports; and
  - d. working with benchmarking experts within the industry to create a comparative analysis.
2. Promote the safety, integrity and security of the ClearGlass dashboard; and
3. Undertake research and to innovate for the advancement of the industry.

### **We will never:**

1. Release any sensitive information that may be attributed to any individual Asset Owner or Manager (as defined in the ClearGlass Website Terms and Conditions (the "Terms"));
2. Reveal the identity of individual Asset Owners or Managers while providing collectivised data/benchmark reports;
3. Create collectivised reports which are traceable to individuals or organisations (e.g. always have a big enough sample size so data cannot be attributed to a particular organisation); or
4. Sell data to a third party.

### **HOW THIS INFORMATION IS SHARED ?**

We will share information with:

1. third party apps, websites and integrations in connection with the provision of the Services (as defined in the Terms);
2. prospective purchasers if we are selling or transferring part or all of our business; and
3. trusted third parties we work with for the purpose of creating value added products and analysis. These services include but are not limited to:
  - a. **Sense Check** – We anticipate that as we grow and collect large volumes of data over a period of time we will be able to build algorithms through which we can give a fair estimate of how far your data set is from the industry mean, median or how many standard deviations from the acceptable range. This helps users of the platform to better analyse the data and take an informed decision on their assets or funds; and
  - b. **Benchmarking** – The algorithms developed for Sense Check can further be extended to create benchmarking reports where the user's data can be mapped against their peers within the industry. All the services will at all times maintain the confidentiality of the user's data.

In order to build our Benchmarking and Sense Check services we will work with McLagan, who is already well-known for its benchmarking and works with many of the world's leading and largest asset managers, keeping their private and highly confidential compensation data secure and anonymised.

By signing up to ClearGlass you are under no obligation to buy benchmarking services. However, McLagan will receive cost data from us because this is necessary to help us collectively develop the algorithms for Sense Check. This does not mean McLagan will share your data with either its parent Aon Hewitt or any other consultant. All our third parties are bound by exactly the same legal arrangements that we have with you and cannot release sensitive information at any point.

**Your data will always be anonymised, collectivised (to disguise its origin) and protected, and the only organisation that will be able to identify your data will be you.**

**Please note:** ClearGlass is a wholly independent legal entity and is not a subsidiary or affiliate of any other company. McLagan or any other third parties have no equity or economic interest in ClearGlass, and has no control either direct or indirect over ClearGlass. McLagan or any other third parties who may work with ClearGlass in the future will not have access to ClearGlass systems and will only be passed data with appropriate permissions received from the user.

#### **WHAT WE NEED FROM ASSET MANAGERS ONLY ?**

Further to our data and privacy policy laid out in the document, we need agreement to the following terms from you in order to deliver our services to the best of our ability:

**Uploading Content:** If you submit, post or upload any content or information to ClearGlass in respect of a mandate and in the form of our templates or otherwise ("Uploaded Content"), you represent and warrant that such Uploaded Content does not include any personal data (as defined by the General Data Protection Regulation (EU) 2016/679).

**Licence to your Uploaded Content:** You grant us a perpetual, worldwide, irrevocable, non-exclusive, royalty-free, transferable licence to use, edit, alter, reproduce, publish, distribute, prepare derivative works of, display, and make available (“Use”) the Uploaded Content, including in connection with ClearGlass and for the purposes of providing the Services and carrying out benchmarking services. This licence shall survive termination. You further grant us the full power to sub-license these rights to any third party.

**Why give us the licence above?** We need you to grant us the licence above in order for us to be able to provide Asset Owners and/or Advisors (as applicable and as defined in the Terms) with the Services. Without receiving this licence, we cannot provide our services to them. We also need the power to sub-license these rights so that we can share your data to third parties in order for us to jointly build algorithms for Sense Check and benchmarking. We will however take the utmost care of your data and only use it in accordance with this Data Policy. Please see our section on data sharing with third parties where they are bound by the same legal obligations as us and will never share any confidential data without your permission.

# PRIVACY POLICY

## WHO WE ARE ?

ClearGlass respects your privacy and takes its obligations to protect your personal information very seriously. This Privacy Policy (“the Policy”) describes how we use your personal data to comply with the General Data Protection Regulation (EU) 2016/679 (“GDPR”).

Your personal information is collected by ClearGlass Analytics Limited (“ClearGlass”) (company number 11561505) (“we”/“us”/“our”). ClearGlass is a wholly independent legal entity and is not a subsidiary or affiliate of any other company.

## TO WHOSE PERSONAL INFORMATION DOES THIS POLICY APPLY?

This Policy describes our practices when using the personal information of individuals who use the ClearGlass dashboard (for example, employees or representatives of Asset Managers or Asset Owners). “Asset Manager” and “Asset Owner” are defined in the ClearGlass Terms and Conditions.

## DATA COLLECTION AND USAGE ?

We will collect, store and use your personal information as set out in more detail in this section. Personal information we collect will be limited, including a dashboard user’s name, professional contact details, login details for authentication and, in certain circumstances, payment details.

## How we use the personal information we collect about ClearGlass dashboard users

We use personal information from ClearGlass dashboard users for certain activities, including:

1. to decide whether to accept any individual as a dashboard user and to set up an account for a dashboard user;
2. to process payments and keep a record of purchases;
3. to verify dashboard user login details;
4. to provide, manage and administer our dashboard services;
5. to provide support and assistance with dashboard user accounts; and
6. to develop and improve our services based on the feedback you provide.

### **Why we use the personal information of ClearGlass dashboard users**

We use this information because:

1. it is necessary to enter into or perform our contract with you;
2. it is necessary to comply with legal or regulatory requirements;
3. it is necessary for the purposes of our or a third party's legitimate business interests. We have legitimate business interests to use your information in:
  - a. providing the ClearGlass dashboard services;
  - b. monitoring, investigating and reporting any attempts to breach the security of the dashboard;
  - c. improving the performance and user experience of the dashboard;
  - d. performing our obligations under our contracts with our users;
  - e. managing our business and brand by responding promptly to complaints; and
  - f. building and maintaining ongoing relationships with Asset Owners and Asset Managers who use the dashboard.

If you have any questions at any time you can contact us at **[support@clearglass.com](mailto:support@clearglass.com)**

In certain circumstances, if dashboard user does not provide personal information which is required we will not be able to perform our obligations under the contract with them or comply with our legal requirements. We will make it clear if and when this situation arises and what the consequences of not providing the information will be for the dashboard user.

## Recipients of ClearGlass dashboard user information

We may disclose ClearGlass dashboard user information as follows:

1. to our business partners, such as McLagan (Aon) Limited, in connection with providing benchmarking services;
2. to third parties who work on our behalf to service or maintain the dashboard, and systems processing account information, such as supplier systems supporting the dashboard;
3. to our professional advisers or suppliers (such as auditors and lawyers);
4. to competent authorities such as tax authorities, courts, regulators and security or police authorities where required or requested by law or where we consider it necessary;
5. if we discuss selling or transferring part or all of our business – the information may be transferred to prospective purchasers under suitable terms as to confidentiality;
6. if we are defending a legal claim your information may be transferred as required in connection with defending such claim.

## HOW LONG DO WE KEEP YOUR INFORMATION ?

We will retain your information as long as is necessary to comply with legal, accounting or reporting requirements. If you would like more information on our data retention periods, please contact us using the contact details below.

## YOUR RIGHTS

You have certain rights in relation to your information, as set out in more detail below.

**Access:** you are entitled to ask us if we are processing your information and, if we are, you can request access to your personal information.

**Correction:** you are entitled to request that any incomplete or inaccurate personal information we hold about you is corrected.

**Erasure:** you are entitled to ask us to delete personal information.

**Restriction:** you are entitled to ask us to suspend the processing of your personal information, for example if you want us to establish its accuracy.

**Transfer:** you may request the transfer of your personal information to another party.

**Objection:** you have a right to object to us processing your information.

You also have a right to lodge a complaint with a supervisory authority, in particular in the Member State in the European Union where you are habitually resident, where we are based in the UK or where an alleged infringement of data protection law has taken place. In the UK you can make a complaint to the Information Commissioner's Office (Tel: 0303 123 1113 or at [www.ico.org.uk](http://www.ico.org.uk)).

Some of these rights will only apply in certain circumstances. If you would like to exercise, or discuss, any of these rights, please contact us on the contact details below.

## CHANGES TO THIS POLICY

This policy will be changed from time to time. If we change anything important about this policy (the information we collect or how we use it) we will contact you prior to the change taking effect and highlight those changes at the top of the policy for a reasonable length of time following the change.

## CONTACT DETAILS

ClearGlass' contact details are as follows:

If you have any questions at any time you can contact us at [support@clearglass.com](mailto:support@clearglass.com). You can also contact us using the Live Chat feature on the ClearGlass dashboard