



PRIVACY POLICY

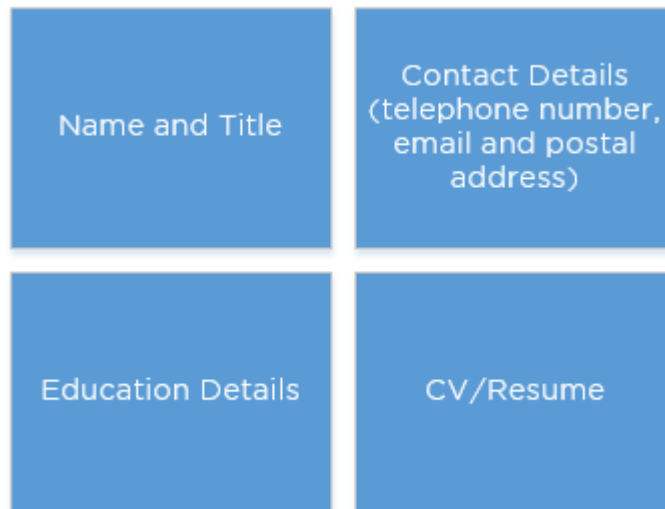
Orbis Portfolio Management (Europe) LLP (“Orbis”) is required to provide you with information about how it processes your personal data.

About this privacy policy

For the purposes of EU data protection law, Orbis is a data controller in respect of your personal data and is responsible for ensuring that we use your personal data in compliance with the law.

This privacy policy applies if you participate in the Orbis Stock Picking Challenge. It sets out the basis on which any personal data about you will be processed by us.

Personal data that we collect



How and why Orbis uses your personal data

Orbis uses your data for the purposes of **administering the Orbis Stockpicking Challenge** and to **meet our legal obligations**.

Disclosure of your information to third parties

We may disclose your personal information to other members of the Orbis Group for the reasons set out in ‘How and why Orbis uses your personal data.’

We will take steps to ensure that personal data is accessed only by Orbis people that have a need to do so for the purposes described in this notice.

We may also share your personal data with third parties for the following reasons:

- so that third parties can **provide services to us**, including, IT and communications providers, law firms, accountants and auditors. These third parties will be subject to confidentiality requirements and they will be required to use your personal data only as described in this privacy policy; and

- to the **extent required by law**, for example if we are under a duty to disclose your personal data in order to comply with any legal obligation.

Transfers of personal data outside the European Economic Area

The personal data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area (“EEA”). It may also be processed by individuals operating outside of the EEA who work for the Orbis Group or for one of our suppliers.

Where we transfer your personal data outside the EEA, we will ensure that it is protected in a manner that is consistent with how your personal data will be protected by us in the EEA in compliance with data protection law.

Retention of personal data

Orbis will hold your personal data for no longer than is reasonably required for the purpose for which Orbis collected your data.

Your rights

You have a number of legal rights in relation to the personal data that we hold about you. You can request that Orbis (a) provides you with a copy of your personal data, (b) corrects your personal data, (c) erases your personal data and (d) restricts our processing of your personal data. You may also object to Orbis’ processing of your personal data. These rights will be limited in some circumstances, for example, where Orbis has a legal obligation to comply with. You can find out more information about your rights by contacting the data protection regulator in your jurisdiction. In the UK this is the [Information Commissioner’s Office](#).

Further information

If you would like further information on how Orbis uses your personal data or the exercise of any of the rights listed above, please email privacy@orbis.com.