

PRIVACY NOTICE

Last updated: 25 April 2025

Virtus International Management takes the privacy and security of your personal information very seriously, and we are committed to protecting and respecting your privacy.

As Virtus International Management, we include the entities we have listed below in section 1 ("Who we are"). When we use "Virtus International Management" (or "VIM"), 'we', 'our' or 'us' throughout this notice, we are referring to any one of our entities. All but one of our legal entities are registered in England and Wales, and all may function as a data controller of your personal information.

Our Privacy Notice explains which personal information we collect from you, how it is stored and utilised. It also covers how we treat the information you give to us, and information we take from third parties. It contains vital information about your rights. We hope you read the notice carefully, so you understand and feel comfortable with how we treat your personal information. By engaging with us in the ways set out in this notice, you confirm that you have read and understood the entirety of this notice, as it applies to you.

This notice applies to individuals who receive our services, as well as individuals who occupy the office locations of our UK premises, including staff, volunteers, candidates, contractors, graduates, apprentices, temporary staff, agency workers, interns, work experience and consultants. Where different activities apply we have called these out in this notice.

VIM recognises that there are risks to you with us processing your personal information, such as economic loss, distress, inconvenience or loss of control if we do not appropriately oversee it. You can find out more information about our security measures in [section 4](#).

We are always looking to improve the information we provide to our clients and contacts so if you have any feedback on this Policy, please let us know using our contact details in [section 15](#).

We explain in this Policy:

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Your rights to object: You have various rights in respect of our use of your personal information as set out in [sections 9 and 10](#). Two of the fundamental rights to be aware of are that you may:

- a) Ask us to stop using your personal information for direct-marketing purposes. If you exercise this right, we will stop using your personal information for this purpose.
- b) Ask us to consider any valid objections which you have to our use of your personal information where we process your personal information based on our, or another person's, legitimate interest.

You can find out more information in [sections 9 and 10](#).

1. Who we are

This Privacy Policy is provided on behalf of all the Virtus International Management entities listed below. All these entities individually can function as data controllers of your personal information:

Entity

Virtus International Management, LLP

Virtus International Services Limited

Virtus Investment Partners International Limited

Virtus International Fund Management Limited (Ireland)

The registered office for all our legal entities is: 48 Dover Street, 5th Floor, London, W1S 4FF.

This Policy also applies to the websites that Virtus International Management operates as described in [section 11](#).

2. Collecting your information



VIM collects and processes your information in these circumstances:

a) When you give us your personal information by phone, email, and via our websites, in writing or otherwise. This includes, but is not limited to, information you give us when you open an account, request quotations, register for email alerts, request literature, signup for newsletters or enter a competition, promotion or survey. The information you give us can include your name, address, email address and other contact information. It can also include your financial and debit card information and other personal details such as your National Insurance number and health information.

b) When you give us your personal information by phone, email, and via our websites, our HR systems, in writing or otherwise for employment reasons. This includes, but is not limited to, information you give us when you apply for a vacancy, are employed by us and when you visit our office premises. The information you give us can include your name, address, email address and other contact information. It can also include your financial information and other personal details such as your National Insurance number and health information. We can also collect information on your employment, training, and education details including your personal information from a recruitment consultant, referees, and job boards as well as from other staff. This may also include special category data such as relating to your gender, sexual orientation, racial or ethnic diversity where you agree to provide this.

c) When you visit our premises: Because of our security policies and procedures in our office premises, we will collect images of visitors using CCTV footage.

d) When you visit our website or use our equipment: When you visit our websites we automatically collect information which includes: the Internet Protocol (IP) address used to connect your computer to the internet, your login information, your geographic location, your browser and browser plug-in type and version, and your operating system and platform. We also collect information about your visit, including the source of your visit, and the full click path and mouse movement through our sites (including date and time). This includes the services you viewed, searches you made on our sites, page response times, download errors, length of visits to certain pages, page interaction information (such as page scrolling, mouse clicks, mouse movements and keyed text), and how you navigated away from any page and any phone number you use to call our Helpdesk. We collect this type of information using a website recording service and our internal telephone systems.

e) When we email you: From time to time when you open an email we have sent you, we automatically collect information including your geographic location, browser type and version, the device, and the operating system and platform you are using. We also collect information about your email consumption, including the full click path from within and on to our sites (including date and time), and whether you opened, deleted, forwarded, printed or unsubscribed from the email, including how long the email was open.



f) When we receive your information from third party service providers: We may receive information about you from third party service providers such as credit reference agencies, payment service providers, outsourced service providers (such as the currency service) or analytics providers. If you have a workplace pension with us, we also receive personal information from your employer.

In the event that we do not receive the entirety of the requested personal information from you, then our ability to provide all of our products and services to you will be impacted.

g) Where you are a member of staff or candidate: When we receive your information in relation to a performance of a contract such as employment (including during the contract): this includes but is not limited to details on your right to work in the United Kingdom/Visa information, gender, nationality, performance/appraisal data, family leaves, hours of work, pay slips, contact information, bank account, pension, tax, annual leave, sick leave, qualifications, employment history, ethnicity, disability, physical /mental health, racial or ethnic origin, religious or other beliefs of a similar nature, family member's data for company benefits /emergency contacts, pre-employment background checks including offences and alleged offences, criminal proceedings outcomes and sentences.

In the event that we do not receive the entirety of the requested personal information from you, then our ability to proceed with the intended access to our premises or with a contractual arrangement such as a form of employment will be impacted.

Some of the personal information that we collect about you or which you provide to us about you or your family members may fall under special categories of data. This includes information about physical and mental health, sexual orientation, racial or ethnic origin, political opinions, philosophical belief, trade union membership and biometric data. We take particular care with this data.

Please see our [CCPA Document¹](#) for further details of specific circumstances in which we process special category personal data or criminal offence data.

3. How your information is used at VIM

We use your personal information in the following ways:

- To provide you with any services and/or information you request from us. This also includes conducting any obligations specified in any contracts between us.
- To get quotations or arrange investments or insurance for you with regulated entities.

¹ [California Consumer Privacy Act \(CCPA\) | State of California - Department of Justice - Office of the Attorney General](#)

- If you contribute to a child's Junior ISA, we will give your name to the parent/guardian who is responsible for the account.
- If you apply for an account with us for someone else, acting with power of attorney, we will use the information you give us about the applicant (including information about the applicant's mental health) and your role as the attorney to provide the product or service you request.
- To build a picture of who you are, to inform our business decisions, and to deliver a relevant and customised experience.
- To comply with our legal and regulatory obligations, co-operate with the court service, our regulators and law enforcement agencies and to prevent and detect crime.
- If we learn of your insolvency or bankruptcy (or any insolvency proceedings), we will transfer your details to the [Official Receiver](#) or appointed insolvency practitioner(s).
- To check instructions you have given us or to resolve disputes including to establish, exercise or defend our legal rights.
- To improve the quality of our services and to train our staff.
- To let you know about any changes we make to our service.
- To process any job application you submit, or that an agency submits for you.
- To tell you (by mail, email, telephone or otherwise) about products and services we think you could be interested in, based on our products you already have or have shown an interest in. You can opt out of this communication at any time.
- To confirm your identity and address, which includes using automated decisions when we conduct financial crime checks.
- To request your feedback on a product or service via a third party we have chosen (we will only share your name and email address).
- Gathering data for analysis and research, and to provide management information or other services internally and to third parties, to tailor and personalise our services, communications and marketing for you.
- To administer our sites and for internal operations, including troubleshooting, data analysis, load management, testing, research, statistical and survey purposes.
- To improve our sites to ensure that the content is as effective as it can be for you and for your computer.
- So we can provide services such as the 'most popular' information on our site.
- So we can show you and others targeted advertisements when you browse the internet.
- So you can choose to participate in interactive features of our sites.
- To tailor and modify our services, communications and marketing for you.
- As part of our efforts to keep our sites safe and secure and to prevent and detect money laundering, financial crime and other illegal activities.
- To monitor, record, store and use any telephone, email or other communication with you. We will update your records with any new information you or a third party provide us, and we will add it to any information we already have.
- When you call our main contact phone number, +44 20 3205 4100, we will collect the Calling Line Identification information and keep a copy of the call for training and security purposes. We will also use your information to help improve our efficiency and effectiveness.
- To deal with any enquiries or issues you have about how we collect, store and use your information, or any requests made by you for a copy of the information we hold about you.
- For internal corporate reporting, business administration, ensuring adequate insurance coverage for our business, ensuring the security of company facilities, research and development, and to identify and implement business efficiencies.

Where you are a member of staff or candidate, we will use your personal information in the following ways:

- To provide you with a form of employment, or work experience, or access to our office premises. This includes storing the personal information in a file for ongoing usage to fulfil any obligations specified in any contracts between us.
- To get quotations or arrange financial services for you and your dependents with regulated entities.
- To perform a contractual arrangement such as employment including payment of salary, statutory sick pay processing, processing of relevant information relating to other forms of statutory leave (such as maternity and paternity leave) and providing contractual benefits and references for your future employers.
- To perform our legal obligations as an employer such as reporting income to HMRC.
- To fulfil health and safety, including disability requirements, by passing medical information within the group and externally such as with statutory sick pay reporting.
- To monitor usage of internet, email and data files on our systems as detailed in the Acceptable Use of IT policy which includes information on the details of the monitoring which is carried out (such as network traffic), the conditions in which monitoring will take place, the nature of the monitoring, level of detail accessed. Further information can be found on the intranet in the General Guidance on Monitoring. This activity will only be performed by authorised entities primarily our internal cyber security teams.
- To monitor compliance with our internal policies, and during use of our equipment or infrastructure, we will monitor and log your digital communications and activity (e.g. internet & email usage). The data collected is kept confidential and will only be utilised and distributed for security and crime prevention purposes.
- For preventing and detecting crime or other unlawful activity such as with our office premises entry and exit systems.
- For our internal systems and policies, including your photograph with our internal email system and emergency contact details so we know who to contact in case you have an emergency at work.
- To improve the quality of our services and to support, train and manage our staff.
- To process any job application you submit, or that a third party submits for you.
- To tell you (by mail, email, telephone or otherwise) about topics we think you could be interested in, based on your contractual terms, such as benefits and our social events. You can opt out of direct marketing communications at any time.
- To confirm your identity and address, which includes using automated decisions when we conduct financial crime checks.
- Gathering data for analysis and research, and to provide management information or other services internally and to third parties.
- To monitor, record, store and use any telephone, email or other communication with you. We will update your records with any new information provided by you or a third party, and we will add it to any information we already have. When you call the VIM main contact phone number, +44 20 3205 4100, we will collect the Calling Line Identification information and keep a copy of the call for training and security purposes. Our internal telephone calls may also be recorded. We will also use your information to help improve our efficiency and effectiveness.
- To comply with our legal and regulatory obligations, co-operate with the court service, our regulators and law enforcement agencies.

- To check instructions you have provided to us or to resolve disputes including to establish, exercise or defend our legal rights.
- To administer our sites and for internal operations, including troubleshooting, data analysis, load management, testing, research, statistical and survey purposes.
- To improve our sites to ensure that our content is as effective as it can be for you and for your computer.
- As part of our efforts to keep our sites safe and secure, and to prevent and detect money laundering, financial crime and other illegal activities.
- To maintain our internal record keeping obligations including absence management, disability discrimination, employee relations issues, health and safety requirements and on your training.
- To deal with any enquiries or issues you have about how we collect, store and use your information, or any requests made by you for a copy of the information we hold about you.
- For internal corporate reporting, business administration, ensuring adequate insurance coverage for our business, ensuring the security of company facilities, research and development, and to identify and implement business efficiencies.

4. Information security

We take the security of your personal data very seriously by utilising appropriate technologies and procedures to protect your personal information.

We keep our data security policies and procedures in line with widely accepted international standards. In addition, we review our policies regularly and update them whenever needed to protect you, and to meet our business needs, changes in technology, and regulatory requirements.

Here are examples of the ways we protect your data:

- a) We have appropriate technical and organisational measures in place to protect you against accidental loss and unauthorised access, use, destruction or disclosure of your data.
- b) We have a business continuity and disaster recovery plan that is designed to help us offer our services and protect our people and assets no matter what happens.
- c) We place appropriate restrictions on access to personal information.
- d) We implement measures and controls, including monitoring and physical measures, to store and transfer data securely.
- e) We complete data protection impact assessments in accordance with legal requirements and our business policies.
- f) We provide data security training for our employees.

g) We utilise a stringent approach to vendor risk management.

The internet is an open medium and we cannot guarantee that any information you send to us by email or via our sites will not be intercepted or tampered with. Any transmission is at your own risk. To help protect your personal information and minimise the risk of it being intercepted by unauthorised third parties, our secure servers use Secure Socket Layer (SSL) encryption when you submit information to us through our sites. You can see this security is in place when you see "https" and the padlock on your URL bar. Older browsers do not always support current SSL technology, so we recommend that you use an up-to-date browser. Once we have received your information, we have strict procedures and security protocols in place to prevent unauthorised access. For more information please visit our [security page](#).

5. VIM's legal basis for using your information

Our legal basis for collecting and using your personal information depends on the exact type of information, and how and when we collect it. However, we will normally only collect personal information from you, your employer, or another third party where one of the following applies:

a) We need your personal information to perform a contract with you (for example if you are a client of one of our financial service products, or a member of staff);

b) It is in our legitimate interests or the legitimate interests of others (for example, to ensure the security of our website). Our legitimate interests are to:

- i. Run, grow and develop our business;
- ii. Ensure a safe environment for our staff and website visitors;
- iii. Marketing, market research and business development;
- iv. Provide client services; and,
- v. For internal group administrative purposes.

If we rely on our (or another person's) legitimate interests for using your personal information, we will undertake a balancing test to ensure that our (or the other person's) legitimate interests are not outweighed by your personal interests or fundamental rights and freedoms which require protection.

c) We have your consent (for example you have ticked a box on a form):

We may utilise your special categories of data (such as health information) where you have provided your consent (which you may withdraw at any time after giving it, as described below).

We may also process your personal information in some cases for marketing purposes on the basis of your consent (which you may withdraw at any time after giving it, as described below).

Your consent is relied upon for us to utilise your personal information in a particular way, but if you later change your mind, then you may withdraw your consent by [contacting us](#) and we will stop doing so.

d) We have a legal obligation to collect your personal information (such as for H.M.R.C. reporting²).

When we collect personal information to comply with a legal requirement or to enter into a contract with you, we will let you know at that time. We will also tell you if providing your personal information is mandatory or not, and what the consequences would be if it is not provided. Similarly, if we collect and use your personal information for our legitimate interests (or those of any third party), which are not set out above we will tell you at that time what those legitimate interests are.

Where you are a member of staff or candidate, we may utilise special categories of data (such as health information) and this is to comply with our employer's obligations to give you rights under employment law such as processing absence records for the purpose of paying statutory sick pay or for processing to assess the working capacity of our staff. Our Appropriate Policy Document (referenced above) provides further details of our lawful basis in these processing scenarios.

We do not use your personal information for automated decision-making, including profiling, where there would be a significant or legal effect on you such as recruitment-based decisions based solely on psychometric testing without any human involvement.

6. How and when VIM shares your information

We will share your personal information with other members of the Virtus International Management Group to:

a) Help us to better understand your needs, run your accounts and improve our products and services. This could be, for example, client modelling, or statistical and trend analysis; and

² [HM Revenue & Customs - GOV.UK \(www.gov.uk\)](http://www.gov.uk)

b) Contact you to tell you about the products and services we provide and think you could be interested in.

We also share your information with the following third parties: partners, suppliers, sub-contractors including but not limited to payment service providers, advertising networks, our professional advisors such as lawyers, auditors, insurers and information, service and software providers that help us improve and enhance our sites.

Our reasons for sharing your information with these service providers include:

a) To uphold our part of any contract we enter into with them or you.

b) To enforce or apply our statutory disclosures or any other agreement or to protect the rights, property or safety of our sites, our users or others.

c) In agreement with advertisers and advertising networks that require your information so they can select and serve adverts about our services to you and others. We will only share your personal information with third party advertisers with the sole aim of assisting them to provide services on our behalf.

d) With our workplace pensions, when your employer, or their appointed third party, asks us for information about your trades or for the value of your holdings to allow them to comply with their regulatory obligations where you have given us your explicit permission. If you hold a workplace pension with us, we will also provide your employer with information about the contributions paid into and fees deducted from your accounts, as well as details of your membership of the relevant scheme.

e) To uphold the security of our IT equipment and office premises.

Where you are a member of staff or candidate, in addition to the above, we will primarily share your personal information with other members of the Virtus International Management Group to help us to fulfil our statutory and contractual obligations to you. This could be, for example, arranging provision of staff benefits.

We will also disclose your information to third parties:

a) Where it is in our legitimate interests to do so to run, grow and develop our business:

b) If we sell or buy any business or assets, we may disclose your personal information to the prospective seller or buyer of such business or assets;

c) If a substantive amount of our assets is acquired by a third party, in which case personal information held by us will be one of the transferred assets;

d) If we are under a duty to disclose or share your personal information: in order to comply with any legal obligation, any lawful request from government, judicial bodies or agencies to make sure we comply with our legal and regulatory obligations; with law enforcement officials; and as may be required to meet national security or law enforcement requirements or prevent illegal activity. The personal information we have collected from you will be shared with fraud prevention agencies, such as Cifas, who will use it to prevent fraud and money-laundering, verify your identity, and detect financial and other crime. If fraud is detected, you could be refused certain services, finance or employment. Further details of how your information will be used by us and these fraud prevention agencies, and your data protection rights, can be obtained at the following link: www.cifas.org.uk/fpn.

Where you are a member of staff or candidate who falls under the Senior Manager and Certification Regime, VIM has a regulatory obligation to provide certain personal information to the FCA, which the FCA will publish on the Financial Services Register. Please contact the SMCR Office if you have any questions regarding this.

e) In order to enforce or apply our terms and conditions or any other agreement or to respond to any claims, to protect our rights or the rights of a third party, to protect the safety of any person or to prevent any illegal activity; or

f) To protect our rights, property, or safety and that of our staff, our clients or other persons. This may include exchanging personal information with other organisations for the purposes of fraud protection and credit risk reduction.

When we share your information with third parties, we make sure the appropriate safeguards are in place to protect your personal information.

We will never sell, trade, or rent your personal information to anyone.

We may also disclose and use anonymised, aggregated reporting and statistics about users of our website or our services for the purpose of internal reporting or reporting to our group or other third parties, and for our marketing and promotion purposes. None of these anonymised, aggregated reports or statistics will enable our users to be personally identified.

If your employer or VIM, as your employer, offers you access to our Retirement Services product, or you approach us directly, we will share your personal information with third parties (a list of our current product types can be found [here](#)) for the purposes of obtaining quotes for annuities. The annuity providers may process your personal information for this purpose as a data controller and will be responsible to you for their utilisation of your personal information for this purpose. They will process your personal information in accordance with their own privacy policy which they will provide to you.

7. Transfers outside of the UK and Europe

We usually store your information on our secure servers in the United Kingdom.

However, where we utilise third parties to process your information for us, for any reason detailed in our Terms and Conditions, we may transfer your information to, and store it and process it inside or outside the UK or European Economic Area. This could be for (but is not limited to) the following purposes:

- a) If you have agreed with us and your employer that we will provide them with your trading activity and account balance details.
- b) Where a fund group in which you hold units requests details of the investors in their funds to comply with their regulatory obligations.
- c) In order to obtain quotations or to arrange investments or insurances with regulated entities.

Where you are a VIM colleague, your personal data may be transferred to, and received from our offices in the United States from time to time, where necessary for employment purposes.

Our partners and service providers may also transfer your personal information outside of the UK or European Economic Area.

We will take all necessary steps to ensure your personal information is treated as securely as possible. For example, we use standard contractual clauses with third parties, so that your information is protected to the same standards as it is in the UK or European Economic Area, even if sent outside of these areas. The countries outside the UK and European Economic Area where your personal information can be transferred to include the United States of America and Singapore.

8. How long VIM stores your personal information

We keep the personal information we collect from you, your employer, and other third parties, where we have an ongoing legitimate business need to do so (for example, to provide you with a service you have requested or to comply with applicable legal, tax or accounting requirements). In line with this, we maintain internal standards which dictate how long we will retain your personal data.

Generally, all records of services we have provided our clients will be held for a minimum of seven years after our relationship has ended, and for staff for a minimum of six years after your employment with us has ended. However, different personal data will be subject to different

retention periods depending on the circumstances or applicable laws. We strive to maintain internal business standards and processes to review and remove data as necessary.

Further requirements will apply depending on the situation and data we process for you. In certain circumstances, we will keep your information for longer than this - for example if we cannot delete it for technical reasons or for compliance with our legal and regulatory obligations. If your personal information is kept for longer than these periods for research and statistical purposes, it will be anonymised.

When we have no ongoing legitimate business need to hold your personal information, we will either delete or anonymise it. If we cannot do this (for example, because your personal information is stored in backup archives), then your personal information will be securely stored, and utilised only for purposes we have already communicated to you, and isolated from any further processing until the archives are deleted.

Where we process information on behalf of other organisations, we will apply the same retention periods as mentioned above.

9. Marketing

We may collect and use your personal information for undertaking marketing by email, telephone and post.

We may send you certain direct marketing communications (including electronic marketing communications to existing clients) if it is in our legitimate interests to do so for marketing and business development purposes.

However, we will always obtain your consent to direct marketing communications where we are required to do so by law.

You have the right to ask us not to process your personal information for marketing purposes. You can do this by contacting us by post or email using the details in the “Contact Us” [section](#). You can also unsubscribe from emails by following the unsubscribe instructions included in every email. If you are a client, you can also unsubscribe by going to the [international](#) or [institutional](#) pages, or, by sending us a secure message. Please note that requests to unsubscribe via post, email or secure message are processed internally and may take longer to mark you as unsubscribed than using the unsubscribe link in the footer of our emails. In any case, we will aim to process all unsubscribe requests received by these methods within 5 working days.

10. Your rights

a) Right of access: You have the right of access to any personal information we hold about you. You can ask us for a copy of your personal information; confirmation whether your personal information is being utilised by us; details about how and why it is being used; and details of what safeguards are in place if we transfer your information outside of the UK or European Economic Area.

b) Right of to update your information: If any of the information we hold is inaccurate, you can ask us to make any necessary amendments.

c) Complaints: If you have any complaints or concerns about our handling of your personal information, then please contact us and we will do our best to resolve these. You can contact us on +44 20 3205 4100 or you write to us at the address below in section 15.

You have the right to complain about our collection and use of your personal information to the Information Commissioner's Office or the data protection authority in the country where you usually live or work, or where an alleged privacy infringement has taken place. For more information, please contact the local data protection authority at: [Information Commissioner's Office](#), Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF or by phone on 0303 123 1113.

You may also seek a remedy through local courts if you believe your rights have been breached.

In certain specific circumstances you also have the following further rights:

a) Right of deletion: You have a right to ask us to delete any personal information which we are holding about you.

b) Right to restrict use of your information: You have a right to ask us to restrict the manner in which we process your personal information.

c) Right to data portability: You have a right to ask us to provide your personal information to a third-party provider of services.

d) Right to object. You have a right to ask us to consider any valid objections which you may have regarding our use of your personal information, where we process your personal information based on our or another person's legitimate interest.

e) Right to stop marketing: You have a right to ask us to stop using your personal information for direct-marketing purposes via [Privacy Notice Form - Opt Out with Affiliate Marketing \(virtus.com\)](#).

We will consider all such requests and provide our response within a reasonable period (and in any event within one month of your request, unless we tell you we are entitled to a longer period required by applicable law). Please note, however, that certain personal information may be exempt from such requests in certain circumstances, for example if we need to keep using the information to comply with our own legal obligations or to establish, exercise or defend legal claims. If an exception applies, we will tell you this when responding to your request. We may request you provide us with information necessary to confirm your identity before responding to any request you make.

Please contact us using the details below in section 15 if you would like further information. To exercise any of your rights you can contact us on 0117 900 9000 or you write to us at the address below in section 15.

11. Using our websites

The websites we own are:

<https://international.virtus.com/>

This notice applies when you use one of the above websites and their content. Partners who provide content or other linking sites found on our websites can also gather information and you should check their privacy notices.

If you visit our websites or use our mobile and/or tablet apps (collectively referred to as “our sites”) you acknowledge that the practices described in this notice apply. Our sites can, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please remember that they have their own policies and that we do not accept any responsibility or liability for their policies or how they collect and use your information.

Our websites let you share via third party social media applications, such as Facebook, LinkedIn and X (previously Twitter). These social media apps can collect and utilise information about how you use our sites. Social media companies can collect and use any personal information that you provide via social media apps according to their own privacy policies, and you should read these carefully before you submit any personal information to these websites. We do not have control over, or responsibility for, those companies or how they use your information.

12. Children

We do not and will not knowingly collect information from any unsupervised child under the age of 13. If you are under the age of 13, you may not use our sites unless your parent or guardian has provided us with their consent for your use of our sites or our site (as applicable).

13. Cookies & similar technologies

Our websites use cookies and other similar technologies. These are typically small files stored on your computer's hard drive, which collect your personal information. You can choose to refuse cookies but that means you cannot view or use all of our website. For detailed information on the cookies we use, how we use them, and how to refuse them, please see our [cookie policy](#).

We also occasionally utilise audience matching, which is a targeted advertising practice that involves sharing "hashed" personal data, such as email addresses or online identifiers, with third parties such as Meta and Google. This allows us to create a target audience for more personalised and relevant advertising campaigns. By hashing your data, your data is converted by an algorithm into a unique string of characters so that no identifiable information is communicated to any third parties. The matching of this hashed data allows both parties to determine whether mutual individuals exist for the purpose of the advertising.

Our lawful basis for utilising audience matching is our legitimate interests in marketing our products and services effectively. You have the right to object to the processing of your personal data for marketing purposes, including audience matching. If you wish to exercise this right, please utilise the contact details provided below.

14. Updating this Privacy Policy

We will update or amend this notice from time to time, to comply with the law or to meet our changing business requirements. You should bookmark and periodically review this page to ensure you are familiar with the most current version and that you are aware of the information we collect, how we utilise it and under what circumstances we disclose it. You can see when our most recent update to this Privacy notice was by checking the "Last updated" note at the top of this Privacy notice. If we need to make substantial changes to this notice, we will notify you, if we hold your contact details, by post or by email, before we make any changes unless we are required to make the change sooner (for example regulatory reasons).

15. Contacting us



If you have any questions about your privacy with us or this Policy, you can [email us](#), write to us at Virtus International Management, Data Protection Officer, 48 Dover Street, 5th Floor, London, W1S 4FF or call us on +44 20 3205 4100.