

It is our policy to take all necessary steps to ensure that personal data held by Bernstein about its employees, customers, suppliers and all other stakeholders is processed fairly and lawfully. Bernstein will take all reasonable steps to implement this policy.

It is the policy of Bernstein to ensure that all relevant statutory requirements are complied with and that necessary internal procedures are designed, implemented and periodically monitored to ensure compliance.

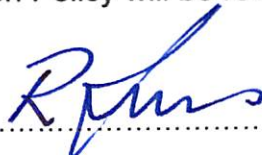
Bernstein will implement and comply with the eight Data Protection Principles contained in the Data Protection Act 1998 ("the Act") which promote good conduct in relation to processing personal information. These Principles are: -

- Personal data shall be processed fairly and lawfully.
- Personal data shall be obtained only for one or more specified and lawful purposes and shall not be further processed in any manner incompatible with that purpose or those purposes.
- Personal data shall be adequate, relevant and not excessive in relation to the purpose or purposes for which they are processed.
- Personal data shall be accurate and, where necessary, kept up to date.
- Personal data processed for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.
- Personal data shall be processed in accordance with the rights of data subjects under the Act.
- Appropriate technical and organisational measures shall be taken against unauthorised or unlawful processing of personal data and against accidental loss or destruction or, damage to, personal data.
- Personal data shall not be transferred to a country or territory outside the European Economic Area unless that country or territory ensures an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal data.

Data protection is a responsibility shared by all Bernstein staff who must familiarise themselves with and observe this Policy and any relevant Bernstein Procedures relating to data protection. The Managing Director has overall responsibility for implementing this policy.

The Data Protection Policy will be reviewed periodically

Robert Emms
Managing Director.....



Date: 18/5/17.....