Equitix Privacy Notice

Equitix Investment Management Ltd, Equitix Infrastructure Investments Ltd and Equitix Ltd ("we", "our" or "us"), as data controllers, are committed to protecting the privacy, security and integrity of your personal data by ensuring that your data is treated with care and is not processed in an unlawful manner. This privacy notice describes how we process your personal data and your rights as a data subject under the UK General Data Protection Regulation ("UK GDPR"), the Data Protection Act 2018, the Privacy and Electronic Communications Regulations 2003 (where relevant) and other applicable data protection laws (together, "Data Protection Law") (the "Notice"). This Notice applies to any personal data that we collect in person, over the telephone, in writing, or electronically.

A. Who does this Notice apply to?

This Notice applies to:

- investors and prospective investors;
- business partners, suppliers and their employees or representatives;
- job applicants; and
- any data subjects who may contact us with enquiries or complaints.

Depending on our relationship with you, we will process your data for different purposes via different means.

B. What is personal data?

"Personal data" is any information relating to an identified or identifiable individual. Examples of personal data include name, date of birth, gender, nationality, address, telephone number, email address, tax identification number, IP address and online identifiers etc.

C. What is processing of personal data?

Processing means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

D. What personal data do we collect?

Investors and prospective investors

We are required to obtain certain information from prospective investors, their directors and beneficial owners for our legitimate interests and to meet legal or regulatory obligations under anti-money laundering regulations, Foreign Account Tax Compliance Act and OECD Common Reporting Standard. Examples of information processed include your name, address, telephone number, social security number or tax identification number, assets, net worth, income, bank account information and occupation.

We may also receive your personal data from our business partners and other third parties, including anti-money laundering, sanctions and fraud screening providers, introducers, professional advisers and publicly available sources.

Business partners, suppliers and their employees or representatives

We or third parties acting on our behalf may process your personal data which includes: name, phone number, postal address, email address, job title, date of birth, gender, information provided when you correspond with us, any updates to information provided to us or any other information you may provide to us.

Job applicants

We or third parties acting on our behalf may process your personal data which includes: name, address, email address, telephone number, gender, pension and pay details, education and professional qualification, employment history, criminal and credit histories (where applicable), information provided when you correspond with us and any updates to information provided to us.

Individuals who may contact us with queries

We may process your personal data which includes: name, phone number, postal address, email address, information provided when you correspond with us, any updates to information provided to us or any other information you may provide to us.

E. Lawful grounds for processing your personal data

We generally rely on one or more of the following lawful grounds for processing your personal data:

- the processing is necessary for fulfilling our obligations under a contract with you;
- the processing is necessary to comply with legal obligations;
- we may process your personal data for our legitimate interests. We will only process your personal data under legitimate interests if we believe that such processing falls within your reasonable expectations and does not override your fundamental rights;
- where relevant, the processing is based on your consent; and
- in limited circumstances and where applicable law permits, the processing is necessary for a recognised legitimate interest. This may include, for example, certain disclosures in response to requests from organisations carrying out public tasks, or processing necessary for emergencies, safeguarding, public security or crime-related purposes.

Where we process special category personal data or criminal offence data, we will do so only where permitted by Data Protection Law and, where required, in reliance on an additional condition under that law.

F. What are our legitimate interests?

Our legitimate interests are:

- operate and develop our business profitably and in accordance with our legal and regulatory requirements;
- operate, maintain and secure our website, systems and networks;
- identify and select appropriate business partners and suppliers;
- marketing, market research and business development (where permitted by law);
- provide investment services to our clients, make and receive payments and provide client services;
- place, track and ensure fulfilment of orders with our business partners and suppliers; and
- protect our business, personnel, systems and clients against fraud, cyber-security threats and other misuse.

G. How and why we share your personal data with others

We may share your personal data with our group companies where it is in our legitimate interests or otherwise lawful to do so. We may share your personal data with the following third parties or categories of third parties:

- our IT service provider;
- the depositary for our managed alternative investment funds;
- the administrator of our fund entities;
- auditors for our corporate and fund entities;

- our legal and other professional advisers;
- banks and other lenders;
- identity verification, anti-money laundering, sanctions, fraud prevention and due diligence screening providers;
- insurers and insurance brokers;
- public or government entities such as Companies House, regulators (for example the FCA) and law enforcement authorities; and
- a purchaser, transferee, replacement service provider or other third party in connection with a sale, reorganisation, restructure, financing or transfer of all or part of our business or assets.

We will also disclose your personal data to third parties where: (i) it is necessary to comply with law, regulation or a lawful request; (ii) it is necessary for the establishment, exercise or defence of legal claims; or (iii) substantially all of our assets are acquired by a third party, in which case personal data held by us may be one of the transferred assets.

H. Consent

Should we want or need to rely on consent to process your data, we will request your consent orally, by email or by an online process for the specific activity we require consent for and we will record your response on our systems. Where consent is the lawful basis for our processing, you have the right to withdraw your consent to this particular processing at any time. You can do this by contacting the Data Protection Team at **dataprotection@equitix.co.uk**. Please note that where consent is withdrawn, this may impact the specific service we can provide to you.

Where required by law, we will also seek your consent for certain electronic marketing communications and for cookies or similar technologies that are not strictly necessary.

I. How long do we retain your personal data?

We will not keep your personal data for longer than necessary for the purposes for which the personal data is processed. The length of time we retain personal data depends on the purposes for which we collect and use it and/or as required to comply with applicable laws and to establish, exercise or defend our legal rights.

- For any materials relating to the provision of third party services, we will retain personal data for six years from termination or expiry of the service contract.
- All data relating to unsuccessful job applicants (including CVs and pre-employment checks) will be retained for up to one year.
- Personal data relating to data subjects who contact us with queries or complaints will be retained for up to one year, unless a longer period is required to investigate or defend a complaint or claim.
- The length of time we retain investors' personal data depends on the purpose for which we collect and use it and/or as required to comply with applicable laws and to establish, exercise or defend our legal rights.

We may retain personal data for longer where required by applicable law, regulation, litigation hold, investigation, audit or to protect our legal position.

J. What are your rights?

You have the following rights in relation to your personal data, subject to applicable law and exemptions:

- Right to receive a copy of any information we hold about you: you have the right to receive a copy of any personal data we hold about you.
- Right to update your information: you have the right to request us to update any of your personal data which is out of date or incorrect.

- Right to erase your information: you have the right to ask us to delete any personal data which we are holding about you in certain specific circumstances.
- Right to restrict use of your personal data: you have the right to ask us to restrict the way that we process your personal data.
- Right to stop promotional communications: you have the right to ask us to stop using your personal data for event organisation or marketing purposes.
- Right to data portability: you have a right to ask us to provide your personal data to you or to another provider of services in certain circumstances.
- Right to object: you have the right to object to our use of your personal data in certain circumstances, including where we process your personal data for direct marketing or for legitimate interests (and, where applicable, recognised legitimate interests).

You have a right to receive one copy of the information free of charge. We reserve the right to charge a reasonable fee for any additional requests or where permitted by law. If you would like further information in relation to these rights or would like to exercise them, please contact us at dataprotection@equitix.co.uk.

K. How long do we have to respond to your request?

We will respond to requests under Section J within one month of receipt, unless a different period applies under Data Protection Law. Please note certain personal data may be exempt from such requests under certain circumstances, for example if we need to process the data to comply with our own legal obligations or to establish, exercise or defend legal claims.

Where permitted by law, we may ask for additional information to verify your identity or to clarify the scope of your request. In those circumstances, the period for responding may be paused until we receive the information we reasonably require.

When responding to a request for access, we are required to carry out a reasonable and proportionate search for personal data within scope of the request.

We may extend the response timeframe where the request is complex and/or there are numerous requests raised by you. In such event, we will inform you within one month of receiving your request and explain why an extension is necessary.

We can refuse to comply with a request if it is manifestly unfounded or excessive, taking into account whether the request is repetitive in nature. In such event, we will inform you without delay and within one month of receipt of the request.

L. Automated decision-making and profiling

We may use automated tools to assist us with anti-money laundering, sanctions, fraud prevention, cyber-security, due diligence and similar risk-based screening. We do not ordinarily make decisions based solely on automated processing that produce legal or similarly significant effects on you. If we do so, we will only do so where permitted by law and subject to appropriate safeguards, including giving you information about the decision and, where applicable, the ability to obtain human intervention, express your point of view and challenge the decision.

M. Cookies

When you visit our website, we may place a cookie on your device which allows the website to remember who you are. Cookies provide additional functionality to the website to better match users' interests and preferences. With most internet browsers, you can erase cookies from your device, block the creation of cookies, or receive a warning before a cookie is stored, although doing so may affect your use of the website and your ability to access certain features of it.

Where required by law, we will ask for your consent before using non-essential cookies or similar technologies. Some cookies may be used without consent where this is permitted by law, for example where they are strictly necessary for the operation of the site or, where applicable law permits, for limited statistical or functionality purposes. Please refer to any cookie banner or separate cookie notice presented on our website for more detailed information.

N. International transfers of personal data

Your personal data may be processed and stored outside of your jurisdiction or at a jurisdiction outside of the United Kingdom and, where relevant, outside the European Economic Area ("EEA"). Where we transfer your personal data to third parties outside the United Kingdom or the EEA (as applicable), we will seek to ensure that the data is protected and transferred in a manner consistent with applicable legal requirements. This may include reliance on adequacy regulations, standard contractual clauses, the UK International Data Transfer Agreement or the UK addendum to the EU standard contractual clauses, as appropriate.

O. Security of personal data

We implement security safeguards to protect personal data against loss, theft, unauthorised access, disclosure, copying, use or modification, regardless of the format in which the information is held. We have implemented physical, electronic, procedural, organisational and technological measures to protect personal data, such as locked filing cabinets, firewalls, encryption, access controls and employee education.

P. Links to Third Party Websites

Our website may contain links that take you to other third party websites. These third party websites are not governed by this Notice but by their own privacy policies that may differ from ours. This Notice does not extend to the processing of personal data by these third parties and we do not assume any responsibility for the privacy practices, policies or actions of third parties. We encourage you to review the privacy policies of each website visited before using those websites or disclosing any personal data to third parties.

Q. Complaints and your right to complain to the ICO

You have the right to make a complaint to us if you are unhappy with how we handle your personal data or how we respond to a request you have made under Data Protection Law. You may contact the Data Protection Team using the contact details below. We will acknowledge your complaint within 30 days of receipt and will take appropriate steps to respond without undue delay.

You also have a right to make a complaint to a supervisory body governing data protection. The supervisory authority in the United Kingdom is the Information Commissioner’s Office ("ICO"). The ICO can be contacted via the following link: https://ico.org.uk/make-a-complaint/

R. Contact Details

The Data Protection Team

Equitix Investment Management Ltd, Equitix Ltd and Equitix Infrastructure Investments Ltd

3rd Floor, South Building, 200 Aldersgate Street, London, EC1A 4HD, UK

Email: dataprotection@equitix.co.uk

You may use these contact details to exercise your data protection rights, raise a complaint with us, or obtain further information about our privacy practices.