

## Privacy Notice

Equitix Investment Management Ltd and Equitix Ltd (“we”, “our” or “us”), as data controllers, are committed to protecting the privacy, security and integrity of your “personal data” (as defined below) 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 General Data Protection Regulation (“GDPR”) (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 applies to?**

This Notice applies to:

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

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 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.

#### *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:

- 1) the processing is necessary for fulfilling our obligations under a contract with you;
- 2) the processing is necessary to comply with legal obligations; and
- 3) 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.

#### **F. What are our legitimate interests?**

Our legitimate interests are:

- operate and develop our business profitably and in accordance with our legal requirements;
- operate our website smoothly;
- identify and select appropriate business partners and suppliers;
- marketing, market research and business development;
- provide investment services to our clients, make and receive payments and provide client services; and
- place, track and ensure fulfilment of orders with our business partners and suppliers.

#### **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 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 advisers;
- banks and other lenders;
- public or government entities such as Companies House, regulators e.g. UK FCA, US SEC; and
- we will also disclose your personal data to third parties: (i) where it is in our legitimate interests; (ii) if substantially all of our assets are acquired by a third party, in which case personal data held by us will 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 client services team on +44 207 250 7333 or by sending an email to [ir@equitix.co.uk](mailto:ir@equitix.co.uk). Please note that where consent is withdrawn, this may impact the specific service we can provide to you.

## 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 service contract.
- All data relating to unsuccessful job applicants (including CV, pre-employment checks) will be retained for up to one year.
- Personal data relating to the data subjects who contact us with queries will be retained for up to one year.
- The length of time we retain investors' personal data depends of 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.

## J. What are your rights?

You have the following rights in relation to your personal data:

- 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 a third party provider of services.
- Right to object: You have the right to ask us to consider any valid objections which you have to our use of your personal data where we process your personal data for our legitimate interests. If you exercise this right, we will no longer use your personal data for the use that you have objected to unless we can demonstrate that we need to use the personal data for the establishment, exercise or defence of legal claims.

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. If you would like further information in relation to these or would like to exercise them then please contact us at [dataprotection@equitix.co.uk](mailto:dataprotection@equitix.co.uk)

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

We will respond to any requests under Section J of the Notice within one month of receipt. Please note certain personal data may be exempt from such requests under certain circumstances, e.g. if we need to process the data to comply with our own legal obligations or to establish, exercise or defend legal claims.

We may extend the one-month respond 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(s) 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. Cookies**

When you visit our website, we may place a “cookie” on the hard drive of your computer 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 computer hard drive, 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 the website. Please refer to your browser instructions or the help section of your browser to learn more about these functions.

**M. Transfer of personal data to non-EEA countries**

Your personal data may be processed and stored outside of your jurisdiction or at a jurisdiction outside of the European Economic Area (“EEA”). Where we transfer your personal data to third parties outside of the EEA, we will seek to ensure that the data is protected and transferred in a manner consistent with any applicable legal requirements.

**N. 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, and employee education.

**O. 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 these websites or disclosing any personal data to third parties.

**P. Right to make a complaint**

You 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/>

You may contact our Data Protection team at the address below to request access to your personal data or to obtain further information about our privacy policies or practices.

**Q. Contact Details**

The Data Protection Team

Equitix Investment Management Ltd and Equitix Ltd

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

Email: [dataprotection@equitix.co.uk](mailto:dataprotection@equitix.co.uk)