

## FOR INDIVIDUALS NOT COVERED BY A SPECIFIC PRIVACY NOTICE

This notice applies to you if we process your personal information and you are not a Connection Capital LLP employee, prospective client, current or former client nor are you an individual to whom we have provided a specific privacy notice. This could include an individual that works at a supplier or service provider that we deal with, an attendee at one of our events, a user of our website, job applicants and non-executive directors and chairperson/financial directors and controllers/ chief executive officers/chief operating officer job applicants or employees of CC's portfolio companies and funds.

References to we, our or us in this privacy notice are to **Connection Capital LLP of One Eleven, Edmund Street, Birmingham, West Midlands, B3 2HJ** (Registered number **OC349617**).

We are committed to respecting your privacy. This notice is to explain how we may use the personal information we collect and use about you during and after your working relationship with us. This notice explains how we comply with the law on data protection and what your rights are.

We have not appointed a Data Protection Officer to oversee our compliance with data protection laws as we not required to do so, but our Data Protection Compliance Manager, Louise McWeeney, has overall responsibility for data protection compliance in our organisation. Contact details are set out in the '**Contacting us**' section at the end of this privacy notice.

### 1. PERSONAL INFORMATION WE COLLECT

You may provide us with or we may obtain personal information about you, such as information regarding your:

- **Contact details:** information that allows us to contact you directly such as your name, email address, telephone number and addresses.
- **Identification:** information such as full name, date of birth, passport/other official identification documents including proof of addresses and information from a third party anti-money laundering/sanction check provider;
- **Business and professional history:** details such as your employment background including positions, roles, responsibilities held and any current or previous directorships, regulatory registers, professional registers, CVs, biographies and Companies House (and equivalent overseas company registers as applicable);
- **Personal history and information;** hobbies/interests, marital status, family details, dietary requirements;
- **Bank account information and creditworthiness:** if we are considering a business relationship with you, we may carry out investigations into your creditworthiness and we may validate your bank account;
- **Performance information:** when working with or for us, performance in relation to a project or work we are engaged in;
- **How you use our website:** we collect information about the website pages you look at and how you use them;
- **Usage of our IT systems when visiting Connection Capital premises;** your usage of our client internet facilities;

- **IP address information;** your computer's IP address allows us to track your usage of the Connection Capital website;
- **Records of your interactions with us:** such as any enquiries or complaints you make, telephone conversations, SMS, MMS, e-mail and other electronic communication, letters and any other correspondence including via your usage of our website;
- **Responses to any feedback requests:** we keep records of feedback you give us including surveys;
- **Subscription information:** for example, if you sign up for Connection Capital news and events updates.

## 2. SPECIAL CATEGORIES OF PERSONAL INFORMATION

We do not generally collect, store and use 'special categories' of more sensitive personal information regarding you. Examples of special categories are as follows:

- information about your race or ethnicity, religious beliefs, sexual orientation and political opinions;
- information about your trade union memberships;
- information about your health, including any medical condition, health and sickness records, medical records and health professional information and disability information; and
- biometric information about you, for example fingerprints, retina scans.

If we did collect any special category personal information about you, we do not currently rely on consent as a basis for processing special category personal information.

We also do not collect, store and use any DBS criminal record information in relation to you, except any information contained within a 'sanction check' which we carry out to comply with the Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017 (MLRs) (as amended). If we did collect any criminal record information, we do not currently rely on consent as a basis for processing criminal record information.

## 3. WHERE WE COLLECT YOUR INFORMATION

We will collect personal information from a number of sources. These include the following:

- **Directly from you:** from yourself, when you complete forms we provide to you, use our website, you indicate that you may wish to attend a Connection Capital event, make a claim, make a complaint, provide identification/anti-money laundering information to us, contact us by phone, email or communicate with us directly in some other way;
- **Our website:** provides us with information about how you use it and the devices that you use to connect to our website;
- **Providers of information:** which may include anti-money laundering and sanction check providers, the Land Registry, Companies House (and overseas equivalent company registers if applicable), professional bodies, regulators, LinkedIn and other web platforms;
- **Your employer or the organisation you work for:** they may provide us with your name, position, contact details and background information about you.

#### 4. WHAT WE USE YOUR PERSONAL INFORMATION FOR

The table below describes the main purposes for which we process your personal information, the categories of your information involved and our lawful basis for being able to do this.

<b>Purpose</b>	<b>Personal information used</b>	<b>Lawful basis</b>
<b>Entering into and performing a contract</b>	All the personal information we collect	This is necessary to enable us to enter into and perform contracts with either yourself or the organisation that you represent.
<b>Identity and anti-money laundering checks</b>	All the personal information we collect which may include identification documents, Politically Exposed Person (PEP) status, financial and bank account information, adverse media and sanction/regulatory/crime checks	We may have a legal obligation to undertake identification and anti-money laundering checks for the purpose of preventing money laundering and terrorist financing. We also have a legitimate interest in knowing your identity.
<b>Fraud and crime prevention</b>	All the personal information we collect	We have a legitimate interest to detect and prevent crime in line with our regulatory obligations.
<b>Marketing to you, our services, products and events which may be of potential interest to you</b>	Name, personal contact details and other identifiers and marketing preferences	We may ask for your consent to process your data for this purpose, you may revoke your consent at any point. Alternatively, if you or your organisation has purchased similar services or products from us previously, we may market similar products or services as a legitimate interest in developing our business. You have the right to opt out from such marketing at any time.
<b>Holding events and workshops</b>	Your contact details, details of attendance, your comments in response forms and dietary requirements	We have a legitimate interest in holding events such as webinars, workshops, tracking attendance and providing appropriate food and drinks at events.
<b>To deal with enquiries, complaints and other communications from you</b>	All the personal information we collect about you	This may be necessary to perform a contract with you or the organisation that you represent.

<b>and providing you with any requested information</b>		We have a legitimate interest to ensure that we operate efficiently in relation to dealing with any enquiries, information requests, complaints or other communications.
<b>Maintain and improve services and products and determine services that may be of interest to you</b>	All the personal information we collect about you	We have a legitimate interest to improve the services that we provide.
<b>For the purposes of staff training</b>	All the personal information we collect about you	We have a legitimate interest to improve the services we provide.
<b>Security of our IT systems</b>	All the personal information we collect about you	We have a legitimate business in ensuring our IT systems are secure.
<b>To conduct data analytics studies and feedback requests to review, and improve our online services</b>	How you use our website and any information you provide in response to any feedback requests	We have a legitimate interest in order to improve as a business.
<b>For the purpose of complying with any regulatory requirements</b>	All the personal information we collect about you	We may have a legal obligation to comply with regulatory requirements and we have a legitimate interest in complying with regulatory requirements.
<b>Storage of records relating to you and also records relating to our business</b>	All the personal information we collect about you	To be able to manage and fulfil our contract with you, we may have a legal and/or regulatory obligation to do so and we also have a legitimate interest to keep proper records.

For some of your personal information, you may have a legal, contractual or other requirement or obligation for you to provide us with your personal information. If you do not provide us with the requested personal information we may not be able to properly perform our contract with you or comply with legal obligations.

For other personal information, whilst you may not be under an obligation to provide it to us, if you do not provide it then we may not be able to properly perform our arrangements with you or the organisation you represent.

You should be aware that it is not a condition of any contract with us that you agree to any request for consent from us and we do not usually rely on consent as a basis for processing your personal

information. However, if we have asked you for consent, and you have given us your consent to use your personal information, you have the right to withdraw this consent at any time, which you may do by contacting us as described in the ‘**Contacting us**’ section below.

Please note however, that the withdrawal of your consent will not affect any use of the data made before you withdrew your consent and we may still be entitled to hold and process the relevant personal information to the extent that we are entitled to do so on bases other than your consent. Withdrawing consent may also have the same effects as not providing the information in the first place, for example we may no longer be able to provide carry out certain activities.

## 5. WHO WE SHARE YOUR PERSONAL INFORMATION WITH

We share personal information with the following parties:

- **Other service providers and advisors to our business:** such as companies that support our IT, help us analyse the data we hold and carry out marketing campaigns, process payments, send communications, provide us with legal or financial advice and generally help us deliver our products and services to you or the organisation that you represent;
- **Other third parties;** where we are entitled to share the personal data (i.e. where we and/or the third party has a legitimate interest in the sharing of this personal data);
- **Agencies undertaking anti-money laundering/sanction checks for us;** in order to verify your identity and carry out anti-money laundering and sanction related checks. These agencies may retain a footprint that a search has been undertaken;
- **Legal or financial journalists:** for example, where there are any applicable changes to limited partnership vehicles (such as a change in partner or increase in capital contribution) is required to be published in The London Gazette;
- **Purchasers of our business:** buyers or perspective buyers to whom we may sell or negotiate to sell our business;
- **The Government, government bodies or our regulators:** where we are required to do so by law or to assist with their investigations or initiatives, for example HMRC, the Financial Conduct Authority (FCA) or the Information Commissioner’s Office (ICO);
- **Police, law enforcement and security services:** to assist with the investigation and prevention of crime and the protection of national security.

We do not disclose personal information to anyone else except as set out above unless we have your consent or we are legally obliged to do so. We do not sell your data. In the event that we were to provide statistics, analytics or trends about the users of our products and services, there would be no data disclosed that can identify any individuals.

## 6. DIRECT MARKETING

**Email, post, telephone and SMS marketing:** from time to time, we may contact you by email, post, telephone or SMS with information about events or services we believe you may be interested in.

We will only send marketing messages to you in accordance with the marketing preferences you set when you create your account or that you tell us afterwards you are happy to receive or where you or the organisation you represent have purchased similar services from us previously or you ask us to send you the information.

You can then let us know at any time that you do not wish to receive marketing messages by sending an email to us at [hello@connectioncapital.co.uk](mailto:hello@connectioncapital.co.uk)/using the details set out in the **'Contacting us'** section below. You can also unsubscribe from our marketing by clicking on the unsubscribe link in any written marketing messages we send to you or by letting us know during any marketing telephone call.

## **7. TRANSFERRING YOUR PERSONAL INFORMATION INTERNATIONALLY**

The personal information we collect may be transferred to and stored in countries outside of the UK and the European Union. Some of these jurisdictions require different levels of protection in respect of personal information and, in certain instances, the laws in those countries may be less protective than the jurisdiction you are typically resident in.

We will take all reasonable steps to ensure that your personal information is only used in accordance with this privacy notice and applicable data protection laws and is respected and kept secure and where a third party processes your data on our behalf, we will put in place appropriate safeguards as required under data protection laws. For further details please contact us by using the details set out in the **'Contacting us'** section below.

Our staff and other individuals working for us may, in limited circumstances, access personal information outside of the UK and European Union if they are working or on holiday abroad outside of the UK or European Union. If they do so they will be using our security measures and will be subject to their arrangements with us which are subject to English Law and the same legal protections that would apply to accessing personal data within the UK.

In limited circumstances the people/organisations to whom we may disclose personal information as mentioned in the section **'Who we share your personal information with'** above may be located outside of the UK and European Union. In these cases, we will impose any legally required protections to the personal information as required by law before it is disclosed.

## **8. HOW LONG DO WE KEEP PERSONAL INFORMATION FOR?**

The duration for which we retain your personal information will differ depending on the type of information and the reason why we collected it from you. However, in some cases personal information may be retained on a long-term basis: for example, personal information that we need to retain for legal purposes will normally be retained in accordance with usual commercial practice and regulatory requirements.

For individual contacts at organisations and suppliers this will be for as long as we continue to have a relationship with that organisation or supplier and then for a period of 6.5 years afterwards.

It is important to ensure that the personal information we hold about you is accurate and up-to-date, and you should let us know if anything changes, for example if you move position or change organisations or change your phone number, email address or postal address. You can contact us by using the details set out in the **'Contacting us'** section below.

## 9. YOUR RIGHTS IN RELATION TO PERSONAL INFORMATION

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

- the right to be informed about how your personal information is being used;
- the right to access the personal information we hold about you;
- the right to request the correction of inaccurate personal information we hold about you;
- the right to request the erasure of your personal information in certain limited circumstances;
- the right to restrict processing of your personal information where certain requirements are met;
- the right to object to the processing of your personal information;
- the right to request that we transfer elements of your data either to you or another service provider; and
- the right to object to certain automated decision making processes using your personal information.

You should note that some of these rights, for example the right to require us to transfer your data to another service provider or the right to object to automated decision making, may not apply as they have specific requirements and exemptions which apply to them and they may not apply to personal information recorded and stored by us. For example, we do not use automated decision making in relation to your personal data. However, some have no conditions attached, so your right to withdraw consent or object to processing for direct marketing are absolute rights.

Whilst this privacy notice sets out a general summary of your legal rights in respect of personal information, this is a very complex area of law. More information about your legal rights can be found on the Information Commissioner's website <https://ico.org.uk/for-the-public/>.

To exercise any of the above rights, or if you have any questions relating to your rights, please contact us by using the details set out in the '**Contacting us**' section below. If you are unhappy with the way we are using your personal information you can also complain to the UK Information Commissioner's Office or your local data protection regulator. We are here to help and encourage you to contact us to resolve your complaint first.

## 10. SECURITY

Connection Capital has IT security measures in place to protect against the loss, misuse or alteration of information that is under our control, such as firewalls, passwords and two factor authentication access. We cannot guarantee that these measures are, or will remain, adequate, however, we do take the security of data very seriously, applying best endeavours to protect the security of the data you provide and these security measures are periodically reviewed and monitored.

## 11. CHANGES TO THIS NOTICE

We may update this privacy notice from time to time. When we change this notice in a material way, we will update the version date at the bottom of this page. For significant changes to this notice we will try to give you reasonable notice unless we are prevented from doing so. Where required by law we will seek your consent to changes in the way we use your personal information.

## 12. CONTACTING US

In the event of any query about our marketing to you, please email [hello@connectioncapital.co.uk](mailto:hello@connectioncapital.co.uk). Should you wish to make a complaint in connection with the information we hold about you, please email [louise.mcweeney@connectioncapital.co.uk](mailto:louise.mcweeney@connectioncapital.co.uk) or write to us at:

FAO: Louise McWeeny  
Connection Capital LLP  
Unit 21 Cottesbrooke Park  
Heartlands Business Park  
Daventry  
Northamptonshire  
NN11 8YL.

Connection Capital LLP is authorised and regulated by the FCA, ref number 705640.

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