

PRIVACY NOTICE FOR CLIENTS AND INVESTORS

This notice applies to you if you are a prospective, current or former individual client of Connection Capital LLP or an employee and/or beneficial owner of a corporate client, who:

- has registered with us to enquire about the investments and services we have to offer;
- we have contacted you about the investments and services we have to offer; and/or
- you have invested in one of our portfolio companies or funds.

This notice does not form part of any contract for services. A copy of our client terms and conditions is available upon request, it is published on our website and for new clients, it is issued in the Welcome Pack.

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

When you interact with us in relation to your work with us, 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. We may contact you for instructions (if you are a client or a person authorised to give instructions to us by a client);
- **On-boarding details:** all information provided by you as part of the client registration process;
- **Identification documents:** information such as passport, driving licence, utility bills, identity cards, signature, etc;
- **Investment records:** including details of your existing investment portfolio and its valuation to the extent that it relates to you, investment returns, the investment vehicles you are using, current directorships, signed powers of attorney and other documents and files (including our legal files relating to the investment from completion right until exit);
- **Family members:** any next of kin, beneficiaries and details of family members either for the purpose of an investment or as emergency contacts;
- **Business and professional history:** investment history, net worth and details of your employment background including any current or previous directorships;
- **Financial information:** bank accounts, payment and receipt details, financial status and tax status;
- **Online account information:** for any of our online portals including username, password and other identifying information and other account information;
- **Identifiers:** such as tax or government identifiers;
- **Advisors appointed by you:** including, lawyers, accountants and financial advisors etc;
- **Records of your interactions with us:** such as any enquiries or complaints you make, telephone conversations, letters and other correspondence (including e-mail) and your usage of our online portals;
- **Responses to any feedback requests:** we keep records of feedback you give us;
- **Your marketing preferences:** so that we know whether and how we should contact you.

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 criminal records information in relation to you. If we did collect any criminal records information, we do not currently rely on consent as a basis for processing criminal records 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 register to become a client of ours, complete forms we provide to you, use our website, 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;
- **Hotbed acquisition:** we may hold personal information about you if you invested in former private equity firm Hotbed’s portfolio of companies, which was acquired by us as a business in 2012;
- **Pension scheme and trust administrators:** who have been delegated to perform the management and administration of any trust or pension scheme through which you have chosen to invest, including Self invested Personal Pensions (‘SIPP’) and Small Self-Administered Schemes (‘SSAS’);
- **Third parties authorised by you:** a family member or someone else authorised by you;
- **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 check providers, the Land Registry, Companies House and other web platforms;
- **Your professional advisors:** such as lawyers, accountants and financial advisors etc;
- **Our professional advisors:** such as our lawyers and accountants.

We will also collect additional personal information throughout the period of the investment process through to exit.

If you are providing us with details about family members they have a right to know and to be aware of what personal information we hold about them, how we collect it and how we use and may share that information. Please share this privacy notice with them. They also have the same rights as set out in the ‘Your rights in relation to personal information’ section below.

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.

Purpose	Personal information used	Lawful basis
For the purposes of on-boarding you as a client	Name, personal contact details and other identifiers, and identification documents, identification and anti-money laundering checks	This is necessary to enable us to enter into, manage and perform our contract with you regarding potential investment opportunities.
Carrying out any identity and anti-money laundering / financial crime checks	Name, personal contact details and other identifiers, and identification documents, anti-money laundering checks	We have a legal obligation to do so. We have a legitimate interest to detect and prevent fraud and crime.

To provide an ongoing service to you as an asset manager including managing your investments, notifying you about distributions and investment exits	All the personal information we collect and payment information, where a payment is being made to you	This is necessary to fulfil our contract with you. If you are not our individual client (i.e. you are a director / beneficial owner of a corporate investor) then to the extent that we process your personal information as controller, we have a legitimate interest in so doing in relation to ensuring our clients receive the appropriate service.
Marketing to you, investments proposals and our services, products and events which may be of potential interest to you	Name, personal contact details and other identifiers, marketing preferences and investment records	When you have registered as a client with us, we have a legitimate interest as part of our service to you, to identify new investment opportunities that may be of interest to you. For prospective individuals who have not registered with us, we will have obtained your explicit consent to market to you.
To manage our business and internal reporting	All the personal information we collect about you	We have a legitimate interest to ensure that we operate efficiently and manage our business properly. To be able to manage and perform our contract with you regarding your investment opportunities.
To deal with enquiries, complaints and other communications from you and dealing with legal disputes involving you	All the personal information we collect about you	We have a legitimate interest to ensure that we operate efficiently and deal with any enquiries, complaints or other communications. We have a legitimate interest to ensure that all legal claims are managed effectively.
For the purposes of staff training	All the personal information we collect	We have a legitimate interest to improve the services we provide.
To provide you with our investor portal and/or website access and for the purposes of ensuring the security of our systems and our information including preventing unauthorised access to our computer and electronic communications systems and preventing malicious software distribution	On-boarding details, online account information and your usage of our IT systems	We have a legitimate business in ensuring our systems are secure.
To conduct data analytics studies and customer satisfaction surveys or feedback requests to review, and better understand our client, retention, attrition and satisfaction levels	Our client records and any information you provide in response to our client feedback requests	We have a legitimate interest in order to improve as a business.
For the purpose of complying with any regulatory requirements	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.
Storage of records relating to you and also records relating to our business	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 will 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 services for you as an asset manager.

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:

- **Any party approved by you:** for example, family members, your broker, financial advisor, legal advisor or other professional advisors;
- **Agencies undertaking anti- money laundering checks for us;**
- **Other service providers to our business and advisors:** third party banks (providing banking facilities and senior debt on investment deals), administration and IT services. All our third-party service providers are required to take appropriate security measures to protect your personal information;
- **Advisors:** either advisors appointed by you, for example legal advisors, or advisors appointed by us;
- **Third party funds /fund administrators:** where we are required to send information about anti- money laundering checks and application information;
- **Pension scheme and trust administrators:** who have been delegated to perform the management and administration of any trust or pension scheme through which you have chosen to invest, including SIPP and SSAS;
- **Legal or financial journalists:** 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;
- **The companies you have chosen to invest in:** where we are required to send information about dividend payments, applications and anti-money laundering checks;
- **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;
- **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.

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 investments, 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 enquiries@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 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, for example, in relation to investments where our own investment vehicle is located outside the UK / EU / EEA or a third party fund / trustee or administrator is located outside the UK / EU / EEA. 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.

The personal information we collect about you is not transferred to or stored in countries outside of the UK or European Union except as set out in this section.

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. If you require more details on the arrangements for any of the above then please contact us using the details in the '**Contacting us**' section below.

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. Generally, where there is no legal requirement we retain all physical and electronic records for a period of approximately 6½ years following the end of our client relationship with you or the closure of your last investment (whichever is the latest to occur) because this is the limitation period for claims related to breach of contract. Exceptions to this general rule are as follows:

- Where your investment vehicle is pension related. We keep your personal information for as long as you remain a member of a pension scheme or as long as we are holding investments in relation to your pension. This can be for a considerable time and extend after you have passed away where the scheme is paying benefits to your dependants or beneficiaries. After that period of time, we will keep your personal information for a reasonable period to maintain our records and our legal obligations and in case of any legal disputes. We generally keep records for a period of 12 years after you cease to be a member of the scheme or we cease holding investments in relation to your scheme.
- Where you or the organisation you own or work for have not yet become a client and we are only engaged in marketing to you, noting that you are able to unsubscribe any time you choose, we will review this periodically but normally not retain your details longer than 6 years since our last interaction, unless you or the organisation you own or work for later becomes a client.

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 home or change your phone number or email address. You may be able to update some of the personal information we hold about you and 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. **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.

11. **CONTACTING US**

In the event of any query or complaint in connection with the information we hold about you or our marketing to you, please email enquiries@connectioncapital.co.uk or write to us at FAO: Louise McWeeney, Connection Capital LLP, Woolverstone House, 61-62 Berners Street, London, W1T 3NJ.

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

Version dated 17 May 2018