

## VenCap (Channel Islands) Limited (the Manager)

### Privacy Notice

This privacy notice explains the manner in which the Manager collects, processes and maintains personal data about you pursuant to the Data Protection Law.

**You should review this notice carefully as it contains information about the treatment of your personal data and your rights under the Data Protection Law.**

**Interpretation:** For the purposes of this privacy notice: (i) **Data Protection Law** means the Data Protection (Jersey) Law 2018, as amended from time to time (ii) **data controller, data processor, data subject, personal data, and processing** shall have the meanings given to them under the Data Protection Law, (iii) **we, us or our** means the Manager, in its capacity as a data controller and/or data processor (as applicable) of the personal data, and (iv) **you or your** means a potential investor who may make an investment into any vehicle managed by the Manager and includes any person owning or controlling the potential investor, having a beneficial interest in the potential investor, or for whom the potential investor is acting as agent or nominee.

**Sources of personal data:** The Manager collects personal data about potential investors mainly through the following sources:

- (a) as a result of a data transfer from VenCap International plc, the Manager's investment advisor;
- (b) investor questionnaires and other information provided by the potential investor in writing (including any anti-money laundering, identification, and verification documentation), in person, by telephone (which may be recorded), electronically or by any other means. This information includes identifiers such as names, addresses, nationalities, tax identification numbers, and financial and investment qualifications; and
- (c) we may also collect personal data relating to you from credit reference agencies and available public databases or data sources, such as news outlets, websites and other media sources and international sanctions lists.

**Purposes:** The storage, processing and use of personal data will take place for the following purposes:

Where the processing is necessary for compliance with a legal obligation to which the Manager is subject

- (a) to comply with in-house procedures and statutory/regulatory requirements applicable to the Manager (including under AML legislation and customer due diligence verification purposes);
- (b) if required in order to comply with FATCA or as otherwise required by law, disclose details of your name, address or taxpayer identification number ("TIN").

Where the processing is necessary for the Manager to take pre-contract steps at your request:

- (a) to manage or administer your interests on an ongoing basis;
- (b) to administer and operate any vehicle it manages;
- (c) risk management and risk controlling purposes relating to the Manager, any entity in the same group as the Manager or any service provider of the Manager.

Where the processing is necessary in order to pursue the Manager's or a third party's legitimate interests:

- (a) to carry out statistical analysis or market research;
- (b) for direct marketing purposes;
- (c) to help detect, prevent, investigate, and prosecute fraud and/or other criminal activity, and share this data with our legal, compliance, risk and managerial staff to assess suspicious activities;
- (d) to investigate and respond to any complaints about us and to help maintain service quality and train staff to deal with complaints and disputes;
- (e) to manage its relationship with you.

Where you consent to the processing of personal data, for any other specific purpose to which you have given specific consent.

As a data controller, we will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

### **Automated decision-making**

We do not envisage that any decisions will be taken about you using fully automated means, however we will notify you in writing if this position changes.

**Disclosure of personal data:** Any disclosure of personal data shall be in accordance with the obligations of the disclosing party under the Data Protection Law. Further:

- (a) we may share your personal information with companies or other entities or persons affiliated with the Manager and any third party to whom the Manager may delegate certain functions in relation to themselves which may include an investment advisor, administrator, distributor and/or other fund service providers (**Processors**) for the purposes set out in this Privacy Notice;
- (b) if we undergo a group reorganization or are sold to a third party, the personal information provided to us may be transferred to that reorganized entity or third party and used for the purposes highlighted above;
- (c) in the course of the processing of personal data such personal data may be transferred to Processors situated or operating in countries outside of Jersey and

the European Economic Area, and such countries may not have data protection laws equivalent to those in Jersey and the EEA. The Manager will, where required to do so by law or where they consider appropriate, implement contracts which seek to ensure that any such entity is contractually bound to provide an adequate level of protection in respect of the personal data transferred to it.

**Potential Investor rights:** You have the right to:

- (a) access your personal data;
- (b) correct your personal data where it is inaccurate or incomplete;
- (c) restrict under certain circumstances the further processing of your personal data;
- (d) ask for erasure of your personal data under certain circumstances;
- (e) object to the use of your personal data (including for direct marketing purposes);
- (f) ask for personal data portability under certain circumstances.

Further, you may at your discretion refuse to communicate personal data to the Manager or object to some processing of your personal data. There are, however, situations where the Manager can refuse to comply with such a request. For example, where it is subject to a legal obligation to process the data. The withdrawal of consent shall not affect the lawfulness of processing for other reasons and based on other grounds where this is permitted under applicable law.

**Exercise of rights:** You may exercise your rights by writing to the Manager at the following e-mail address: [vencapadmin@intertrustgroup.com](mailto:vencapadmin@intertrustgroup.com).

**Complaints:** Should you have any unresolved complaints in relation to the retention or processing of personal data, you may lodge a complaint with the Data Protection Authority in Jersey: Tel +44 (0)1534 716530 or at [www.OICJersey.org](http://www.OICJersey.org).

**Retention of Personal Data:** The personal data shall not be held by the Manager for longer than necessary with regard to the purposes of the data processing, subject to any limitation periods provided by law.

**Changes to Privacy Notice:** The Manager reserves the right to update this Privacy Notice at any time, and will ensure that any update to this privacy notice is made available to you. We encourage you to regularly review this and any updated Privacy Notice to ensure that you are always aware of how personal data is collected, used, stored and disclosed. We may also notify you in other ways from time to time about the processing of your personal data.