

Ventiga Capital Partners LLP

PRIVACY NOTICE

Last updated: 18 May 2018

Ventiga Capital Partners LLP (hereinafter referred to as “Ventiga”, “we”, “us” or “our”) is an FCA regulated advisor on and arranger of private equity investments.

This Privacy Notice explains how Ventiga, as data controller for the purposes of the General Data Protection Regulation, collects, uses and shares your personal information.

Collection of personal information

"Personal information" (also referred to as "Personal Data" in some jurisdictions) is any information that can be used to identify you or that we can link to you.

Information we collect from you

We collect, process and use your personal information when you:

- Meet with us;
- provide us with a business card;
- contact us via email or other channels, for example, to enquire about a job opportunity;
- request information from us;
- engage with our services or we engage with your services or seek advice from you.

The information we collect is typically related to an enquiry that you make, a potential transaction that Ventiga considers or a transaction that Ventiga arranges or advises upon, or a service that you provide to us or advice that we obtain from you and includes:

- your name and title;
- your contact information including employer, job title, address, email address and telephone number;
- identification and background information provided by you or collected by us as part of applicable laws (such as anti-money laundering regulations);
- your CV, details of previous employment history and professional activities, references provided by third parties;

- nature of the service requested, or service provided to us or advice sought by us; and
- related information so that we may fulfill your request or assess your suitability for involvement in a transaction or receive a service or seek advice from you.

Note that we may be required by law to collect certain personal information about you, or as a consequence of any contractual relationship we have with you. Failure to provide this information may prevent or delay the fulfilment of these obligations. We will inform you at the time your information is collected whether certain data is compulsory and the consequences of the failure to provide such data.

Information we collect from other sources

We may also receive information about you from other sources, including publicly available sources, such as your employer's website, or third parties that help us update, expand, and analyse our records, identify new customers, assess your suitability for involvement in a transaction (including by verifying your identity) or to prevent or detect fraud.

How we use the personal information we collect

We may use your personal information:

- To respond to your enquiries and requests;
- To provide you with services that you request or for us to seek services from you or advice from professional advisors, including accountants, lawyers and other consultants;
- To operate, troubleshoot, and improve our services;
- To assess potential transactions, arrange and administer any transaction entered into and provide business updates on such transactions;
- To maintain our list of contacts;
- For our business purposes, including data analysis; detecting, preventing, and responding to actual or potential fraud, illegal activities, or intellectual property infringement;
- To comply with regulatory and legal obligations to which we are subject (such as anti-money laundering and sanctions checks, assessing and managing risk) and cooperate with regulators and law enforcement bodies;
- To evaluate, recruit, and hire personnel for our firm or for potential management roles in transactions we advise on or arrange; and
- As we believe reasonably necessary or appropriate to: comply with our legal obligations; respond to legal process or requests for information issued by government authorities or other third parties; or protect your, our, or others' rights.

How we may share the information we collect

We may share the information we collect, including your personal information, with third parties under the following circumstances:

- **Service providers and business partners.** We may share your personal information with our service providers and business partners that perform marketing services and other business operations for us, such as cloud hosting solutions and professional advisers including accountants, lawyers or other consultants, or other persons who have an interest or involvement in, or are considering an interest or involvement in, a transaction on which we advise or arrange, such as co-investors or other providers of finance.
- **Protection of rights and other legal purposes.** We may share the information we collect, including personal information, with any law enforcement agency, court, regulator, government authority or other third party where we believe this is necessary to comply with a legal or regulatory obligation, or otherwise to protect our rights or the rights of any third party.

Data transfers from the EU

Please note that the information which you provide to us may be transferred to countries outside the European Union where the laws governing data collection and use may differ from EU law. By way of example, this may happen if any of our servers are from time to time located in a country outside of the EU. We take great care in protecting your personal information and have put in place adequate mechanisms to protect it when it is transferred internationally.

Legal bases for using your personal information

There are different legal bases that we rely on to use your personal information, namely:

- **Performance of a contract** – The use of your personal information may be necessary to perform the contract that you have with us. For example, as a user of our services we will use your personal information to respond to your requests and provide you with such services.
- **Legitimate interests** – We may use your personal information for our legitimate interests in running our business for example to improve our services, administering and maintaining records of services or advice we have received.
- **Legal** – to comply with our legal obligations to you or a third party.

Security and data retention

We deploy administrative, technical, and physical safeguards designed to safeguard the information that we collect. We evaluate these safeguards on an ongoing basis to help minimise risks from new security threats as they become known.

However, no information system can be 100% secure. So, we cannot guarantee the absolute security of your information. Moreover, we are not responsible for the security of information you transmit to us over networks that we do not control, including the Internet and wireless networks.

We retain the information collected pursuant to the criteria in our data retention policy. After that time, we may aggregate the data and retain it for analytical purposes.

In relation to information provided to us for recruitment purposes, we retain this information for 6 months following the last time we have had contact with you in relation to such recruitment except where the process culminates in you becoming an employee of Ventiga.

Your choices and your rights

Subject to local law, you may have certain rights regarding information that we have collected and that is related to you. We encourage you to contact us to update or correct your information if it changes or if you believe that any information that we have collected about you is inaccurate.

Consistent with legal requirements and limitations, you can also ask us:

- to see what personal information we hold about you;
- to erase your personal information;
- to port your personal information; and
- to restrict our use of your personal information.

Please note that we will likely require additional information from you in order to honour your requests.

If you would like to discuss or exercise such rights, send us an email at info@ventigacapital.com. Alternatively you may have a right to complain to your local data protection authority (if one exists in your country).

Changes to this Privacy Notice

We may update this Privacy Notice from time to time. The effective date of the current Privacy Notice is noted at the top of this page. We encourage you to periodically review this page.

How to contact us

If you would like to contact us with questions about our privacy or data protection practices, please contact us at info@ventigacapital.com.