

## Privacy Notice

Astir Capital Advisors Ltd (the “Firm”) is committed to protecting and respecting your privacy. This Policy explains how your personal information is processed by the Firm, including any affiliates listed in the Data Controllers and Contact section below (hereinafter also collectively referred to as “us”, or “we”).

This Policy covers personal information relating to you that we may collect through any medium, including specifically in relation to the investment services we provide to you, via our partners and service providers, or through our website. This policy describes how you can access and make certain choices about how we use your personal information.

### Your personal information that we may collect

We may collect and process data the below listed information with respect to persons connected with the investment services we provide. As well as collecting personal data from our clients, we may also process personal data about relevant persons connected with the investment services, for example investors in our funds, co-investors, directors of investee company portfolios, etc.

We may collect this information from a number of sources, including directly from you, via our affiliates, delegates, partners, service providers, professional advisors, or third-party entities with whom we undertake due diligence checks upon you. In doing so, we will ensure that the information we collect is proportionate to our stated purposes.

Where relevant, we may collect and process personal information related to persons related to you. In such circumstances, it is your responsibility to ensure you have permission from that third-party for us to collect their information and you remain responsible for ensuring that the third-party understands how their information is being used.

#### Individuals connected with our investment services

We may collect and process your: personal details, including your name, address, email and telephone/fax numbers, date of birth, nationality; employment details, including your employers name, your position or title and your corporate contact details; information on your financial circumstances, including your profession, income, assets and liabilities, as well as sensitive and/or criminal data.

#### Individuals connected with our partners and service providers

We may collect and process your: contact information, including your name, address, position, email and telephone/fax numbers; financial details, including relevant details for invoicing and billing; and KYC documentation, if and where required under relevant Anti-Money Laundering or Counter Terrorism Financing (“AML/CTF”) legislation.

#### Individuals connected with our website

We may collect and process your: personal details, including your name, address, email and telephone/fax numbers, as well as your login identification and password details; and technical information, including your IP address, browser information, and details relating to your visit behavior on our website. Further details are provided under our ‘**Cookie Policy**’ heading below.

## **Our legal bases and purpose for holding your personal information**

Unless specifically stated otherwise in a Privacy Notice provided to you, we use your personal information in the following ways and based upon the following lawful bases:

### Individuals connected with our investment services

1. In order to achieve our legitimate interests. In doing so, we ensure that:
  - a. your rights and interests are considered and protected and there is a minimal privacy impact upon you;
  - b. we are able to demonstrate that we use your data in a proportionate manner and you would not likely be surprised or likely to object to our usage;
  - c. we can lawfully disclose personal data to a third-parties where we can demonstrate that this disclosure is justified;
2. To comply with our legal or regulatory obligations. For instance, under the UK Financial Conduct Authority Conduct of Business rules and/or relevant AML/CTF legislation;
3. Based upon reasons of substantial public interest; and
4. Where your personal information is public information by your own actions.

### Individuals connected with our partners and service providers

1. In order to fulfil our contractual obligations to you in order to facilitate the provision of goods or services. This includes where you have asked us to do something before entering into a contract, for example to provide a quote;
2. To comply with our legal or regulatory obligations. For instance, under relevant AML/CTF legislation;
3. Based upon reasons of substantial public interest; and
4. Where your personal information is public information by your own actions.

### Individuals connected with our website

1. In order to achieve our legitimate interests. This may include electronic communications between us; the provision of investment information to you; details in order for us to manage and improve our website; for us obtaining and recording details relating to your visit behavior on our website;
2. To comply with our legal or regulatory obligations. For instance, under relevant AML/CTF legislation;
3. Based upon reasons of substantial public interest; and
4. Where your personal information is public information by your own actions.

## **When we may disclose your personal information**

We may disclose your personal information with the following category of recipients, and based upon the legal bases and purposes set-out above:

1. Our affiliates, including where relevant third-party investment funds that we either manage or advise.

2. Our partners and service providers, including service providers appointed by the third-party investment funds that we advise;
3. Any law enforcement, court, regulator or other government authority in order for us to comply with a legal obligation laid down by UK or EU law. This includes the provision of information relating to any affiliate of the Firm.
4. A prospective buyer of our business, including where we intend to sell part of our business or merge with another third-party.

## How and where we store your personal information

We store your physically held personal information in our UK offices. Whereas we store your electronically held personal information on servers in located in the UK which are fully backed-up.

We take all reasonable steps to protect your personal information; however, where you choose to transmit your personal data to us via the internet, we do not guarantee the security of the personal information transmitted and therefore any transmission is at your own risk.

We may transfer your personal information to our affiliates, partners or service providers that are based outside of the European Economic Area. In such circumstances, we will ensure that your personal information is adequately protected to European Commission approved standards.

## Your rights as a Data subject

In certain circumstances, in relation to your data, you have the right to:

5. The right to be informed
6. The right of access,
7. The right to rectification,
8. The right to erasure,
9. The right to restrict processing,
10. The right to data portability,
11. The right to object, and
12. Rights in relation to automated decision making and profiling.

Further details of your rights can be found at the ICO website, however, please note that your rights are subject to our overarching legal responsibilities:

<https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

If you wish to exercise any of these rights, please contact the relevant data controller (listed below).

## How long we retain your personal information

We reserve the right to retain your personal information for as long as we reasonably believe it to be necessary in order to facilitate our legitimate interests, in order for us to comply with our legal or regulatory obligations, where based upon reasons of substantial public interest, or where your personal information remains public information by your own actions. For further information, please contact the relevant data controller (listed below).

## Our responsibilities when we make changes to our Privacy Policy

We may make changes to our Privacy Policy at any time and may do so without expressly notifying you of these changes. However, should the legal bases or purpose for processing your personal information changes then we shall expressly notify you.

## Our Data Controllers and how to contact us

Questions or individual data requests relating to this Policy should be addressed to the relevant data controller. For the purpose of the data protection legislation, the relevant data controllers are:

Data Controller	Responsible for
Astir Capital Advisors Ltd Registered number: 06917418 2 Queen's Gate, Kensington, London SW7 5EH Richard.Crosby@astircapital.com 020 7758 5800	All investment and business administration activities related to our regulated activities.
(Affiliate, Appointed Representative of Astir Capital Advisors Ltd) CC Strategic Partners UK Limited Registered number: 10770964 71 Queen Victoria Street, London, EC4V 4BE <a href="mailto:csackville@ccstrategic.com">csackville@ccstrategic.com</a> 0207 758 5807	Capital raising for alternative investment managers, investor relations.
(Affiliate, Appointed Representative of Astir Capital Advisors Ltd) GCN Capital Ltd Registered number: 11916397 Manor Farm, Lasham, Alton, England, GU34 5SL mn@gcn-capital.com 07990 593 736	Capital raising for alternative investment managers, investor relations.

## Our Cookie Policy

A cookie is a small piece of data sent from a website and stored on the user's computer by the user's web browser while the user is browsing. We only use cookies that are required for the essential operation of our website. These cookies are typically deleted from your device once the browsing session is terminated.

You can choose to block cookies that we may deliver to your device through settings on your web-browser; however, in doing so you may not be able to access or utilise all aspects of our website.