

## Privacy Notice

### Hengistbury Investment Partners LLP

“Hengistbury”, “we”, “us” and “our” means Hengistbury Investment Partners LLP (the “Investment Manager”) and we are committed to respecting your privacy.

We are registered in the UK and our registered address is at First Floor, 34 Brook Street, London W1K 5DN and our Partnership Number is: OC365747.

#### About this privacy notice

For the purposes of data protection law, we are a data controller in respect of your personal data. Hengistbury is responsible for ensuring that it uses your personal data in compliance with data protection law.

This privacy notice applies to you if you are providing or have provided Hengistbury personnel with any personal data in support of an investment (or potential investment) in a Fund managed by us. The privacy notice sets out the basis on which any personal data about you that you provide to us, that we create, or that we obtain about you from other sources, will be processed by us. Please take the time to read and understand this privacy notice.

#### Personal data that we collect about you

We will collect and process the following personal data about you:

- **Information that you provide to us or one of our affiliates.** This includes information about you that you give us by filling in forms or by communicating with us, whether face-to-face, by phone, e-mail or otherwise. This information may include: your name and address (including proofs of name and address), contact details, date of birth, gender, nationality, photograph, signature, occupational history, job title, income, assets, other financial information, bank details, investment history, tax residency and tax identification information.
- **Information we collect or generate about you.** This includes: Information relating to your (or an applicant’s) potential investment in the Fund, emails, call recordings and messages submitted through the Administrator’s website. We may also record and retain such information on a Client Relationship System (CRS)
- **Information we obtain from other sources.** This might include information obtained for the purpose of the Fund’s know-your-client procedures (which include anti-money laundering procedures, counter-terrorist financing procedures, politically-exposed-person checks, sanctions checks, among other things), information from public websites and other public sources and information received from the applicant’s advisers or from intermediaries.

#### Uses of your personal data

Your personal data may be stored and processed by us in the following ways and for the following purposes:

- Assessing your suitability and determining whether you would meet the FCA’s criteria that would enable us to accept and process your application for shares in the Fund and other share dealings, including performing know-your-client procedures, issuing and redeeming shares, receiving payments from and making payments to the applicant, calculating net asset value, and overseeing these processes.
- General business administration, including communicating with future, existing and former investors, communicating with service providers and counterparties, accountancy and audit services, risk monitoring, the administration of IT systems and monitoring and improving products.

- Compliance with legal and regulatory obligations and industry standards, including know-your-client procedures, the automatic exchange of tax information and legal judgments.
- In respect of information shared with Hengistbury and its affiliates, in their business activities relating to the Fund, such as investor relations, discussions with the Fund's service providers and counterparties, decision-making in relation to the Fund, and business strategy, development and marketing.

We are entitled to use your personal data in these ways because:

- we have legal and regulatory obligations that we have to discharge;
- we may need to in order to establish, exercise or defend our legal rights or for the purpose of legal proceedings; or
- the use of your personal data as described is necessary for our legitimate business interests (or the legitimate interests of one or more of our affiliates), such as:
  - (i) carrying out the ordinary or reasonable business activities of the Fund, the Investment Manager, the Fund's administrator or other persons, or other activities previously disclosed to the Fund's investors or referred to in this privacy notice;
  - (ii) ensuring compliance with all legal and regulatory obligations and industry standards, and preventing fraud;
  - (iii) establishing, exercising or defending legal rights or for other purposes relating to legal proceedings; and
  - (iv) ensuring the security of information systems.

### **Disclosure of your information to third parties**

We may from time to time, in accordance with the purposes described above, disclose your personal data to other parties, including (a) to a fund managed by us (b) professional advisers such as law firms, fund administrators, accountancy firms and their affiliates, (c) other service providers providing services to us or a fund managed by us, including technology service providers, (d) counterparties and (e) courts and regulatory, tax and governmental authorities. Some of these persons will process your personal data in accordance with our or a fund's instructions and others will themselves be responsible for their use of your personal data. These persons may be permitted to further disclose the personal data to other parties.

We may also share your personal data outside of Hengistbury Investment Partners LLP and our affiliates:

- if we sell any of our business or assets, in which case we may disclose your personal data to the prospective buyer for due diligence purposes;
- if we are acquired by a third party, in which case personal data held by us about you will be disclosed to the third party buyer;
- to third party agents or contractors (for example, the providers of our electronic data storage services) for the purposes of providing services to us. These third parties will be subject to confidentiality requirements and they will only use your personal data as described in this privacy notice; and
- to the extent required by law, for example if we are under a duty to disclose your personal data in order to comply with any legal obligation, establish, exercise or defend our legal rights.

### **Transfers of personal data outside the European Economic Area**

The personal data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). It may also be processed by staff operating outside of the EEA who work for our affiliates or for one of our suppliers.

Where we transfer your personal data outside the EEA, we will ensure that it is protected in a manner that is consistent with how your personal data will be protected by us in the EEA. This can be done in a number of ways, for instance:

- the country that we send the data to might be approved by the European Commission;
- the recipient might have signed up to a contract based on “model contractual clauses” approved by the European Commission, obliging them to protect your personal data; or
- where the recipient is located in the US, it might be a certified member of the EU-US Privacy Shield scheme.

In other circumstances the law may permit us to otherwise transfer your personal data outside the EEA. In all cases, however, we will ensure that any transfer of your personal data is compliant with data protection law.

You can obtain more details of the protection given to your personal data when it is transferred outside the EEA (including a copy of the standard data protection clauses which we have entered into with recipients of your personal data) by contacting us in accordance with the “Contacting us” section below.

### **Retention of personal data**

How long we hold your personal data for will vary. The retention period will be determined by various criteria including:

- the purpose for which we are using it – we will need to keep the data for as long as is necessary for that purpose; and
- legal obligations – laws or regulation may set a minimum period for which we have to keep your personal data.

### **Your rights**

You have a number of legal rights in relation to the personal data that we hold about you. These rights include:

- the right to obtain information regarding the processing of your personal data and access to the personal data which we hold about you;
- the right to withdraw your consent to our processing of your personal data at any time. Please note, however, that we may still be entitled to process your personal data if we have another legitimate reason (other than consent) for doing so;
- in some circumstances, the right to receive some personal data in a structured, commonly used and machine-readable format and/or request that we transmit those data to a third party where this is technically feasible. Please note that this right only applies to personal data which you have provided to us;
- the right to request that we rectify your personal data if it is inaccurate or incomplete;
- the right to request that we erase your personal data in certain circumstances. Please note that there may be circumstances where you ask us to erase your personal data but we are legally entitled to retain it;
- the right to object to, and the right to request that we restrict our processing of your personal data in certain circumstances. Again, there may be circumstances where you object to, or ask us to restrict, our processing of your personal data but we are legally entitled to continue processing your personal data and / or to refuse that request; and
- the right to lodge a complaint with the data protection regulator (details of which are provided below) if you think that any of your rights have been infringed by us.

You can exercise your rights by contacting us using the details set out in the “Contacting us” section below. You can find out more information about your rights by contacting the Information Commissioner’s Office, or by searching their website at <https://ico.org.uk/>.

### **Contacting us**

If you would like further information on the collection, use, disclosure, transfer or processing of your personal data or the exercise of any of the rights listed above, please address questions, comments and requests to Tyne Cameron ([tcameron@hengistburypartners.com](mailto:tcameron@hengistburypartners.com)).