



Your personal data and privacy is important to us.

We are committed to safeguarding your personal data and protecting your privacy.

This privacy notice and cookies notice (**privacy notice**) explains how we (Epiris LLP, Epiris Managers LLP and Epiris Advisers LLP) achieve that by describing:

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Section 1: How this privacy notice applies to you

This privacy notice applies to you as a:

- visitor to our website located at <http://www.epiris.co.uk> and any other website that we operate; and/or
- shareholder, director or senior member of staff (either an employee, independent contractor or any other non-employee classification) of a business into which we are considering making an investment.

This privacy notice replaces all similar privacy policies and notices, cookies policies and notices, and data related notices that we have previously issued.

Any notices or statements relating to data, data protection, fair processing and/or privacy that we may issue at the time of collecting personal data about you will supplement this privacy policy. They are not intended to override it.

We may change this privacy notice from time to time to reflect changes in the law and/or our personal data handling activities and data protection practices.

We encourage you to check this privacy notice for changes whenever you visit our website, as we may not always notify you of the changes.

Please note that our websites contain links to third party websites. Epiris is not responsible for the data protection or privacy policies of those third parties.

Section 2: Who the controller of your personal data is

Epiris LLP of Forum St Pauls, 33 Gutter Lane, London EC2V 8AS is the controller of any of your personal data that we collect via our websites pursuant to the EU General Data Protection Regulation 2016/679 (**GDPR**) and the UK Data Protection Act 2018 together with any other relevant applicable data laws and regulations.

Our other companies listed above will be the controller of your personal data that we collect as part of any investment process that we become involved.

Where it is not clear who the controller is, you can assume that it is Epiris LLP.

Section 3: How to contact us

If you have any questions or concerns regarding the practices described in this privacy notice, please contact us by:

- email at dataprotection@epiris.co.uk ; or
- post to FAO: Compliance Manager at Epiris LLP, Forum St Pauls, 33 Gutter Lane, London EC2V 8AS.

If you do contact us, we will do our utmost best to address any concerns you may have about our processing of your personal data.

Section 4: What personal data we collect

Personal data means any information relating to an identified or identifiable individual. It does not therefore include data where the identity has been irreversibly removed (**anonymous data**).

We may collect, process, use, store, share and transfer (generically referred to in this privacy notice as **handling**) the following different types of personal data about you depending on how we interact with you. The following is not an exhaustive list:

Website use

- Contact information - including name, home address, personal and work-related email addresses, telephone number;
- Personal details - including date of birth, gender, visa status, nationality, image, national insurance number, copy of your passport;
- Technical data – when you use our websites, we will automatically receive technical information, such as IP address, browser type and language, access times and referring website addresses. For more information please see the Cookies section below; and
- any other personal data, which you may provide to us via our websites.

Investment purpose

- Contact information - including name, home address, work-related email addresses, telephone number;
- Personal details - including date of birth, gender, visa status, nationality, image, national insurance number, copy of your passport;
- Professional and educational information - including previous or concurrent positions held, qualifications, language skills, attendance at educational establishments;
- Role details - such as status of your current position, performance ratings, details of any disciplinary actions contract length, benefit plan participation details, leave, periods of absence, job history; and
- Financial details - such as salary information, benefit information, pension details, details of any shareholding you might have in any other business.

We will not collect any special categories of personal data about you.

Special categories of personal data include personal data that reveal your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data.

References throughout this privacy notice to your personal data are to all the types of personal data listed within this Section 4 that apply to you and any other types that we collect from you.

Section 5: Where do we source your personal data, and how?

We will primarily collect your personal data directly from you when you visit our websites.

In the case of the investment purpose, we will collect it from the company into which we are considering making the investment.

We may also collect personal data from publically available sources (such as LinkedIn).

Section 6: Who do we share your personal data with?

In accordance with applicable law, we may disclose your personal data to the following categories of entities:

Third parties including:

- identity verification organisations;
- background checking organisations;
- your referees; and
- any other third party service providers.

Affiliates which include Epiris LLP, Epiris Advisers LLP and Epiris Managers LLP and any other entity that we may establish or purchase from time to time; and

Our professional advisors including our attorneys.

Section 7: What are the purposes and the legal grounds for our collecting, handling and sharing of your personal data?

Website use

Purpose/Activity	Types of personal data	Legal basis/grounds for handling
To enable us to respond to an enquiry or other request you make when you contact us via our websites.	Contact information Personal details Technical data	The processing is necessary for the legitimate interest of responding to an enquiry or providing you with information that you have requested.
To better understand how you interact with our websites, including its functionality and features, and ensure that content is presented in the most effective manner.	Technical data	The processing is necessary for the legitimate interest of being able to offer our website visitors the best experience we can.
For marketing purposes, in the form of newsletters, invitations to events and competitions run by us.	Contact information Personal details	Consent, which we will provide to you separately and which you can withdraw at any time.

Investment purpose

Purpose/Activity	Types of personal data	Legal basis/grounds for handling
For the purposes of: <ul style="list-style-type: none"> • assessing potential transactions; • maintaining records of investments; • administering any transaction that we enter into; • assessing your suitability for involvement in a transaction, including by verifying your identity; • providing periodic business updates; • safeguarding our legal rights and interests; and • seeking and receiving advice from our professional advisers, including accountants, lawyers and other consultants. 	Contact information Personal details Professional and educational information Role details Financial details	The processing is necessary for the legitimate interest of assessing whether or not we will invest in the business you are connected to.

Purpose/Activity	Types of personal data	Legal basis/grounds for handling
For the purposes of: <ul style="list-style-type: none"> • complying with legal and regulatory requirements relating to counter-terrorist financing; and • complying with our regulatory, tax and legal obligations, including assessing and managing risk. 	Contact information Personal details Professional and educational information Role details Financial details	The processing is necessary for compliance with a legal obligation to which we are subject.

Section 8: How will we look after your personal data?

We take appropriate technical, physical, and organisational measures to protect your personal data against unauthorised access, unlawful processing, accidental loss or damage, and unauthorised destruction.

In determining the appropriate security measures, we will take into account technological developments and assess the measures against the risk of harm that may result from any security breach.

Equipment and Information Security

To safeguard against unauthorised access to your personal data by third parties, all electronic copies of your personal data held by us is and will be maintained on systems that are protected by secure network policies and procedures, firewalls, network auditing and intrusion detection systems.

The servers holding your personal data are backed up on a regular basis to avoid the consequences of any inadvertent erasure or destruction of such data. The servers are stored in facilities with comprehensive security and fire detection and response systems.

Access Security

We limit access to internal systems that hold your personal data to a select group of authorised users. Access to your personal data is limited to and provided to individuals for the purpose of assessing whether or not we will invest in the business to which you are related. Decisions regarding such access are made by our Compliance Officer.

If you suspect any misuse or loss of or unauthorised access to your personal data, please let us know immediately by contacting us.

Section 9: How long will we keep your personal data for?

Your personal data collected via our websites will be stored on servers located in an EEA member state and will be processed by our staff or by one of our service providers operating within the EEA.

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, accounting or reporting requirements.

In the case of the investment purpose, for example, we will retain your personal data for the period it takes for us to make an assessment as to whether or not to invest in the business to which you are connected.

When determining any appropriate retention period for your personal data, we consider the amount, nature, sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means and the applicable legal requirements.

In some circumstances, you may ask us to delete your personal data. Please see the [Right of erasure](#) section below for further information.

Section 10: Keeping your personal data up to date

We take reasonable steps to ensure that your personal data is accurate, complete and up to date.

We may contact you from time to time to check that the personal data is still correct.

Please let us know of any changes to your personal data as soon as you reasonably can so that we can uphold our commitment to accuracy, completeness and currency.

Section 11: Your rights in respect of your personal data

We set out below a list of the legal rights that all individuals have under data protection laws in relation to our handling of your personal data. Note that they don't apply in all circumstances:

- **Right to be informed** – about your personal data and details of the handling and processing of that personal data and information, including the safeguards used to protect any of your personal data in the event that we transfer it outside the EEA;
- **Right of access** – to your personal data and to obtain information about how we handle and process it;
- **Right to have inaccuracies corrected** – this is a right to have your personal data corrected if it is inaccurate and to have incomplete personal data completed;
- **Right of erasure** – of your personal data, which is also known as the “*right to be forgotten*”;
- **Right to restrict handling and processing** – of your personal data, which includes requesting us to suppress your personal data file;
- **Right to move, copy or transfer**– your personal data to another organisation, also known as “*data portability*”;
- **Right to object** – to the handling and processing of your personal data for certain purposes;

- **Right to withdraw consent** – you may withdraw any consent or permission that you have previously provided to us in relation to our handling and processing of your personal data, such as for the purposes of marketing by electronic means;
- **Rights in relation to automated decision making** – where such automated decision making has a legal effect on you or otherwise significantly affects you; and
- **Right to complain** – in all circumstances, you may complain to:
 - us in relation to the handling of your personal data; or
 - your local supervisory authority

Procedure to exercise your legal rights

- **Contact us** – if you wish to exercise any of your legal rights please [contact us](#). In this instance, we'll explain first whether or not the right you wish to exercise applies. We will then facilitate your request in accordance with the procedure below, if it does apply.
- **Fees** – you will not have to pay a fee to access your personal data or to exercise any other rights that apply. We may, however, charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.
- **Our request for further information** – we may need to request certain information from you to help us confirm your identity before giving you the right to access your personal data (or to exercise any of your other rights that apply). This is a security measure to ensure that any personal data is not disclosed to any person who does not have the right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.
- **Response time** – we will respond to all legitimate requests as soon as we can. It should not take longer than a month to do so. Occasionally, it may take us longer than a month if your request is particularly complex or if you have made a number of requests. In this case, we will notify you and keep you updated.

Section 12: Your FAQs Answered

Who can I ask about this notice? – to ask us anything in relation to this privacy notice or any personal data that we may hold, please simply please [contact us](#).

Can I request that you stop using my personal data? – you have legal rights in respect of your personal data. Please refer to Section 11 for more information on what legal rights you have and how you can exercise them.

What should you do if your personal data changes? – you should tell us by contacting us, so that we can update our records.

Do you have to provide your personal data to us? – no, you do not. However, should you choose not to this may affect our ability to invest in the company to which you are connected.

Section 13: Cookies

Cookies are small files that are often created when you visit a website and which are stored in the cookie directory of your computer.

A cookie often includes an anonymous unique identifier. Cookies do not damage your computer. Each website can send its own cookie to your browser if your browser's preferences allow it, but (to protect your privacy) your browser only permits a website to access the cookies it has already sent to you, not the cookies sent to you by other sites. You can decide if you want to accept cookies by changing the settings on your browser to either accept all cookies, reject all cookies or notify you when a cookie is set.

We can use both session-specific and persistent cookies.

Session-specific cookies are deleted when you leave the website. We use session cookies for the following purposes:

- to hold the information given while using an interactive tool on the website;
- to hold your details when you are logged into the site;
- to hold your search criteria while you are doing a search of the website; and
- to collect website usage and performance information - website usage information cookies contain no personal information and cannot be used to identify you.

Persistent cookies remain on your computer for a specified time. We use persistent cookies to collect website usage information for use as described above. These cookies contain no personal information and cannot be used to identify you.

We currently only deploy Google Analytics session-specific cookies, which help us to determine accurately the number of visitors to our websites and volumes of usage. This is to ensure that our websites are available when you want them and are fast.

Removing and disabling cookies

If you do not wish to accept cookies on to your machine you can disable them by adjusting the settings on your browser. However this will affect the functionality of the websites you visit. You can opt-out from being tracked by Google Analytics in the future by clicking on the following link: <https://tools.google.com/dlpage/gaoptout>.

For more help on how to disable your cookies or delete them visit www.aboutcookies.org.