

WEBSITE PRIVACY POLICY

Introduction

Aliter Capital respects your privacy and is committed to protecting your personal data. This privacy policy tells you what personal data we collect about you, how we will use and look after it and about your privacy rights in accordance with the UK General Data Protection Regulation (“**UK GDPR**”).

Important information about who we are

Controller

Aliter Capital LLP (registration number: OC413075), a limited liability partnership with its registered office address 14 Brook’s Mews, England, W1K 4DG (referred to as “**Aliter**”, “**we**”, “**us**” or “**our**”), is the data controller and decides how your personal data is processed.

If you have any questions about this privacy policy or would like to make a request to exercise your legal rights, please contact us using the contact details set out below.

Email address: admin@alitercap.com

Postal address: 14 Brook’s Mews, England, W1K 4DG

You also have the right to make a complaint at any time to the Information Commissioner’s Office, the UK regulator for data protection issues (www.ico.org.uk). In certain circumstances you might also have the right to bring a complaint to other regulators or in the Courts although we would hope that you give us the chance to deal with any concerns you might have first by contacting us.

Purpose of this privacy policy

This privacy policy provides you with information about how and why we collect and process your personal data. This privacy policy applies to you if you visit our website alitercap.com (regardless of where you visit it from), if you enquire about our services, use our services or otherwise interact with us. However, please note that if you are an employee of Aliter then your personal data will be processed in accordance with our Employee Privacy Policy.

Third party links

Our website may include links to third party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy policies. When you leave our website, we encourage you to read the privacy notice of every website you visit.

Information we collect about you

Personal data is any information about an individual from which that person can be identified. It does not include information derived from personal data where the identity has been removed, such that the person can no longer be directly or indirectly identified from the information (“**anonymous data**”).

We may collect, use, store and transfer different types of your personal data which we have grouped together as follows:

- **Identity Data**, which includes your first name, surname, your business / employer's name and your job role.
- **Contact Data**, which includes your business email address, phone number and address.
- **Profile Data**, which includes your username and password and your preferences.

We may also collect Log Data, which includes your computer's Internet Protocol (IP) address, your browser type and version, the type of device you are using, its operating system, unique device identifiers, your device settings and geo-location data, the pages you visit, the time you spend on each page and the date and time of your visit. It is possible that your Log Data could be used for security purposes (e.g. to identify potentially suspicious IP addresses). However, we do not use any personal data we might collect through our Log Data for profiling or other purposes and we do not share your Log Data with third parties (save to the extent that this might be necessary for security purposes).

We may also collect, use and share aggregated anonymous data such as statistical or demographic data to improve our website or the products and services we provide. For example, we may aggregate your Log Data to calculate the percentage of website visitors accessing a specific website feature. However, if we combine or connect aggregated anonymous data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

We do not collect any special categories of personal data about you (this includes details about 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).

If you don't provide us with your personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you don't provide us with that data when requested, we may not be able to perform the contract we have or are trying to enter into with you.

How we collect your personal data

We use different methods to collect data from and about you, including through:

- **Direct interactions.** You may give us your personal data by filling in forms or corresponding with us by post, phone, email or otherwise. This includes personal data you provide us when you:
 - make an enquiry about our services;
 - to create you an account on our website;
 - use our platform;
 - provide us with feedback; or
 - contact us.
- **Automated technologies or interactions.** As you interact with our website, we will automatically collect Profile Data and Log Data. We collect this data by using cookies and other similar technologies. Please see our Cookie Policy for further details.
- **Third parties or publicly available sources.** We may collect your personal data from third parties and public sources. This could happen when we carry out compliance

checks, or other due diligence, and we obtain data from publicly available sources such as Companies House and the Electoral Register based inside the UK. It is also possible that we may process Log Data, containing your personal data, through analytics providers such as Google based outside the UK. However, we do not analyse such data or use it for any other purposes (save to the limited extent that any personal data may be processed for security purposes, as mentioned above).

How we use your personal data

We collect and use your personal data for different purposes depending on how you interact with us and the services that we supply to you or your business. Data protection law requires us to have a legal basis to process your personal data for each particular purpose. We will only use your personal data when we have a legal basis for doing so. Most commonly, we will rely on one of the following legal bases:

- Where it is necessary to perform the contract we are about to enter into or have entered into with you (“**Performance of a contract with you**”).
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests (“**Necessary for our legitimate interests**”).
- Where we need to comply with a legal obligation (“**Necessary to comply with a legal obligation**”).
- We may also rely on your consent as a legal basis for processing your personal data (“**Consent**”).

Purposes for which we will use your personal data

We have set out below, in a table format, a description of purposes for which we may use your personal data, which of the legal bases we rely on to do so and the types of personal data processed for each purpose. We have also identified what our legitimate interests are where appropriate.

In some cases, we may process your personal data for more than one legal basis depending on the specific purpose for which we are using your personal data. Please contact us if you would like more detailed information about how we process your personal data.

We may also inform you of additional purposes for processing your personal data when that information is collected from you.

Purpose / activity	Legal basis for processing (including details of legitimate interests)	Type of personal data processed	Parties we might share your personal data with
To create an account for you on our website.	Performance of a contract with you.	Identity Data and Contact Data.	AssetMetrix, who run our web portal.
To manage our relationship with you, which will include notifying you about	Performance of a contract with you.	Identity Data, Contact Data and Profile Data.	N/A.

changes this privacy policy or any other terms applicable to you and dealing with your requests, complaints and queries.	<p>Necessary to comply with a legal obligation.</p> <p>Necessary for our legitimate interests (to keep our records updated and manage our relationship with you).</p>		
To ensure that when making investments or carrying out other activities, we meet compliance requirements, such as identity checks, credit reference and background checks and assess the financial risks of any proposed investment or funding into your business.	<p>Performance of a contract with you.</p> <p>Necessary to comply with a legal obligation.</p>	Identity Data and Contact Data.	
To administer our website (including troubleshooting, data analysis, testing, system maintenance, support reporting and hosting of data).	Necessary for our legitimate interests (for running our business, network security and to prevent fraud).	Identity Data, Contact Data and Log Data.	N/A.
To administer and conduct our company affairs (including complying with mandatory reporting obligations and other legal requirements such as under tax, health and safety and data protection laws) and disclosures required by enforcement agencies.	<p>Necessary for our legitimate interests (for running our business).</p> <p>Necessary to comply with a legal obligation.</p>	Identity Data and Contact Data.	The Financial Conduct Authority and other relevant regulatory authorities.

Change of purpose

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 lawful and compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we intend to use your personal data for an unrelated purpose, we will notify you and explain the legal basis which allows us to do so. Please note that, in limited circumstances, we may process your personal data without your knowledge or consent where this is required or permitted by law.

Criminal offence data

We will only collect criminal offence data if it is appropriate given the nature of the processing and where we are legally able to do so. For example, in certain circumstances, we may collect information about criminal convictions as part of our compliance processes when making investing and funding decisions. We will only use information about criminal convictions and offences for background and screening checks where this is lawful and appropriate safeguards are in place to protect your personal data.

Disclosures of your personal data to third parties

We may share your personal data with the parties listed in the table above for the specific purposes listed.

We may also share your personal data with other third parties in certain circumstances, such as to third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

International data transfers

Whenever we transfer your personal data outside of the UK, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- transferring your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the UK;
- using approved standard contractual clauses which give personal data the same protection it has in the UK; or
- transferring when one or more of the conditions set out in Article 49 of the UK GDPR are met.

Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. These include limiting access to your personal data to our employees, contractors, agents and other third parties who have a business need to access it. We have also put in place procedures to

deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

How long we keep your personal data for

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for. These purposes may include satisfying legal, regulatory, tax, accounting or reporting requirements. We may also retain your personal data if we reasonably believe it may be needed in relation to a complaint or in order for us to exercise or defend a legal claim.

To determine the appropriate retention period for personal data, we consider the amount, nature and 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, as well as any other relevant legal, regulatory, tax, accounting or other requirements.

If you want to know more about how long we keep your data please contact us. In some circumstances you can ask us to delete your data – see “*your legal rights*” section below for more details.

Your legal rights

Under certain circumstances, you have rights under data protection law in relation to your personal data. You have the right to:

- **Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- **Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- **Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:
 - if you want us to establish the data's accuracy;

- where our use of the data is unlawful but you do not want us to erase it;
 - where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims;
 - where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or
 - you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- **Request the transfer** of your personal data to you or, where technically feasible, another data controller where you have provided it in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
 - **Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact us.

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data or to exercise any of your other rights. This is a security measure to ensure that personal data is not disclosed to any person who has no 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.

Time limit to respond

We try to respond to all legitimate requests within one month. It could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

What we ask of you

- **Keep your information accurate and up to date.** Please inform us if there is a change in your contact details or any other information that you have provided to us so that we can ensure our records are kept accurate and up to date.
- **Third party personal data.** If you provide us with personal data about another person please make sure that you have informed them of our identity, the purposes for which their personal data will be processed and obtained their permission and/or complied with any other data protection requirements. If you are unsure whether their personal data can be shared with us, please contact us before providing us the data.

Changes to our privacy policy

We reserve the right to revise, alter and reissue this privacy policy at any time. If we make changes to our privacy policy, we will update this page and would therefore ask that you check it from time to time and contact us if you have any queries. If we make material changes, we may also provide you with additional notification of those changes via email therefore it is important you keep your contact details up to date.

This version of the privacy policy was last updated on [INSERT DATE].