

## Tencendur Capital LLP – Data Protection Privacy Policy

### INTRODUCTION

Tencendur Capital LLP are committed to protecting the privacy and security of those with whom we interact. We recognise the need to respect and protect information that is collected or disclosed to us ("Personal Information" explained below). This Data Protection Privacy Policy (the "Policy") is intended to tell you how we use your Personal Information, and describes how we collect and use your personal information during and after your relationship with us, in accordance with applicable Data Protection Laws.

### WHO WE ARE

Tencendur Capital LLP ("Tencendur", "We", "Our", and "Us") is an investment manager based in London with its registered office at Windsor House, Station Court, Station Road, Great Shelford, Cambridge, CB22 5NE, United Kingdom. Tencendur is regulated by the UK Financial Conduct Authority (FRN: 790589). Our objective is to deliver excellent investment products and services ("Products and Services") for our customers, resulting in safe, fair and professional service at all times.

Tencendur is committed to handling data fairly and lawfully, and takes its data protection obligations seriously. Tencendur ensures that it processes Personal Information in compliance with applicable data protection laws, including, without limitation, the General Data Protection Regulation 2016/679 ("GDPR").

### WHAT IS PERSONAL INFORMATION AND WHAT PERSONAL INFORMATION DOES TENCENDUR COLLECT ABOUT YOU?

For the purposes of this Policy "Personal Information" consists of any information that relates to you and/or information from which you can be identified, directly or indirectly. For example, information which identifies you may consist of your name, address, telephone number, photographs, location data, an online identifier (e.g. cookies identifiers and your IP address) or to one or more factors specific to your physical, physiological, genetic, mental, economic, cultural or social identity. When We combine other information (i.e. information that does not, on its own, identify you) with Personal Information, We treat the combined information as Personal Information.

We may collect some or all of the following personal data (this may vary according to your relationship with Us):

- Name;
- Date of birth;
- Gender;
- Marital status;
- Address;
- Email address;
- Telephone number;
- Business name;
- Job title;
- Profession;
- Financial and payment information;
- Information contained within identity documents, including passport and driving license (via the holding and storing of these documents);
- Statutory reference numbers, including national insurance number and unique
- Tax reference (UTR); and
- Information about your preferences and interests.

### HOW IS YOUR PERSONAL INFORMATION COLLECTED?

We may collect Personal Information that you give to us including when you email us or contact us through various channels as well as obtaining Personal Information from third parties, publicly available sources (e.g.

Companies House filings, background check provider, social media), Our website (using 'cookie' technology), applications, platforms, services and events.

As part of Our due diligence on customers, potential customers, vendors, employees and job applicants, We may carry out information searches and may take steps to verify your identity in accordance with applicable legislation.

## HOW DO WE USE YOUR INFORMATION?

Under the GDPR, We must always have a lawful basis for using personal data. This may be because the data is necessary for Our performance of a contract with you, because you have consented to Our use of your personal data, or because it is in Our legitimate business interests to use it. Your personal data will be used for the following purposes:

- Supplying Our Products and Services to you. Your personal details are required in order for Us to enter into a contract with you and for Us to provide Our Products and Services to you.
- Undertaking anti-money laundering checks as required under Money Laundering Regulations.
- Personalising and tailoring Our Products and Services for you.
- Communicating with you, including responding to emails or calls from you.
- Supplying you with information by email and/or post that you have opted-in to (you may unsubscribe or opt-out at any time by emailing Us at [info@tencendurcap.com](mailto:info@tencendurcap.com) or clicking the 'Unsubscribe' option in an email communications).

With your permission and/or where permitted by law, We may also use your personal data for marketing purposes, which may include contacting you by email, telephone and/or post with information, news, and offers on Our Products and Services. You will not be sent any unlawful marketing or spam. We will always work to fully protect your rights and comply with Our obligations under the GDPR and the Privacy and Electronic Communications (EC Directive) Regulations 2003, and you will always have the opportunity to opt-out.

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 compatible with the original purpose. If We need to use your personal data for a purpose unrelated to the purpose for which We collected the data, We will notify you and We will explain the legal ground for processing.

With your permission and/or where permitted by law, We may use your Personal Information (such as your contact details (e.g. name, address, email address, telephone number)) for marketing purposes, which may include contacting you by email, telephone and/or by post with information and news about Our Products and Services. When We process your Personal Information for marketing purposes, We do so on the basis that it is in Our legitimate interests to do so, or in the case of Our email notification service, that it is necessary to perform any contract with you. We do not share Personal Information with third parties for the third parties' marketing purposes.

We may also use your Personal Information to personalise and to target more effectively Our marketing communications to ensure, to the extent possible, that any marketing-related correspondence is relevant to you. We may process your personal data without your knowledge or consent where this is required or permitted by law.

It is important that the Personal Information We hold about you is accurate and current. Please keep us informed if your Personal Information changes during your relationship with Tencendur.

## TO WHOM DO WE DISCLOSE YOUR INFORMATION?

We will only use your Personal Information for Our internal business purposes, some of which are mentioned above. We do not sell any of your Personal Information to third parties. However, We may have to disclose your information to third parties including but not limited to affiliates, service providers, IT support services, regulators, HMRC, legal teams, accountants etc.

We require all third parties to whom We transfer your data to respect the security of your personal data and treat it in accordance with the law. We only allow such third parties to process your personal data for specified purposes and, where relevant, in accordance with Our instructions.

In some limited circumstances, We may be legally required to share certain personal data, which might include yours, if We are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

#### WHAT DO WE DO TO KEEP YOUR INFORMATION SECURE?

We have put in place appropriate physical and technical measures to safeguard the Personal Information We collect in connection with Our Products and Services. In addition, We limit access to your Personal Information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your Personal Information on Our instructions and they are subject to a duty of confidentiality. However, please note that although We take appropriate steps to protect your Personal Information, no website, product, device, online application or transmission of data, computer system or wireless connection is completely secure and therefore We cannot guarantee the security of your Personal Information.

We have 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 AND WHERE DO WE STORE OR TRANSFER YOUR PERSONAL DATA?

All your personal data held directly by Us is stored in the UK and will be protected under the GDPR. From time to time We may need to transfer your personal data outside of the European Economic Area (EEA) to help us provide Our Products and Services, or to comply with applicable legal or regulatory obligations. Where any online/cloud-based systems are based outside the EEA then We may store or transfer your data to a “third country”. In such cases, We take every reasonable measure and precaution to protect and secure your data to a similar degree by ensuring that:

- a) any such country has been deemed to provide an adequate level of protection for personal data by the European Commission; or
- b) We use specific contracts or codes of conduct or certification mechanisms approved by the European Commission which give personal data the same protection it has in Europe; or
- c) where We use providers based in the United States, We may transfer data to them if they are part of the EU-US Privacy Shield which requires them to provide data protection to standards at similar levels to those in Europe.

If none of the above safeguards is available, We may request your explicit consent to the specific transfer. You will have the right to withdraw this consent at any time.

#### HOW LONG WE WILL STORE/KEEP YOUR PERSONAL INFORMATION?

We will only retain Personal Information for as long as necessary to fulfil the purposes for which your Personal Information has been collected as outlined in this Policy unless a longer retention period is required by law. When your Personal Information is no longer required for the purpose it was collected or as required by applicable law, it will be deleted and/or returned to you in accordance with applicable law. In some circumstances you can ask Us to delete your data as detailed in this Policy.

In some circumstances We may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case We may use this information independently without further notice to you.

#### ACCESSING YOUR PERSONAL INFORMATION AND OTHER RIGHTS YOU HAVE

Tencendur will collect, store and process your Personal Information in accordance with your rights under any applicable Data Protection Laws. Under certain circumstances, you have the following rights in relation to your Personal Information:

- i. **Subject Access** – you have the right to request details of the Personal Information which we hold about you and copies of such Personal Information.

- ii. **Right to Withdraw Consent** – where Our use of your Personal Information is based upon your consent, you have the right to withdraw such consent at any time. In the event you wish to withdraw your consent to processing, please contact us using the details provided below.
- iii. **Data Portability** – you may, in certain circumstances, request us to port (i.e. transmit) your Personal Information directly to another organisation.
- iv. **Rectification** – We want to ensure that the Personal Information about you that We hold is accurate and up to date. If you think that any information We have about you is incorrect or incomplete, please let us know. To the extent required by applicable laws, We will rectify or update any incorrect or inaccurate Personal Information about you.
- v. **Erasure ('right to be forgotten')** – you have the right to have your Personal Information 'erased' in certain specified situations.
- vi. **Restriction of processing** – you have the right in certain specified situations to require us to stop processing your Personal Information and to only store such Personal Information.
- vii. **Object to processing** – You have the right to object to specific types of processing of your Personal Information, such as, where We are processing your Personal Information for the purposes of direct marketing.
- viii. **Prevent automated decision-taking** – in certain circumstances, you have the right not to be subject to decisions being taken solely on the basis of automated processing. We do not use your personal data in this way.

### ENFORCING YOUR RIGHTS

If you wish to enforce any of your rights under applicable Data Protection Laws, then please contact us at [info@tencendurcap.com](mailto:info@tencendurcap.com). We will respond to your request without undue delay and no later than one month from receipt of any such request, unless a longer period is permitted by applicable Data Protection Laws, and We may charge a reasonable fee for dealing with your request which We will notify to you. Please note that We will only charge a fee where We are permitted to do so by applicable Data Protection Laws.

### Complaints

If you are concerned that We have not complied with your legal rights under applicable Data Protection Laws, you may contact the Information Commissioner's Office ([www.ico.gov.uk](http://www.ico.gov.uk)) which is the data protection regulator in the UK which is where Tencendur is located. Alternatively, if you are based outside the UK, you may contact your local data protection supervisory authority.

### THIRD-PARTY LINKS AND COOKIES

Our websites, applications, information about Our Products and Services may contain links to other third-party websites that are not operated by Tencendur. These linked sites and applications are not under Our control and as such, We are not responsible for the privacy practices or the content of any linked websites and online applications. If you choose to use any third-party websites or applications, any Personal Information collected by the third party's website or application will be controlled by the Policy of that third party. We strongly recommend that you take the time to review the privacy policies of any third parties to which you provide Personal Information.

### What are cookies?

Tencendur may use cookies and other technologies, including web beacons, action tags, pixel tags, in certain areas of Our Products and Services. Cookies are small text files that can be read by a web server in the domain that put the cookie on your hard drive. Cookies are assigned to and stored in a user's internet browser on a temporary (for the duration of the online session only) or persistent basis (cookie stays on the computer after the internet browser or device has been closed). Cookies collect and store information about a user's preferences, product usage, content viewed, and registration information which allows for Tencendur to provide users an enhanced and customised experience when engaging with Our Products and Services. We may use cookies to store your preferences and settings, help you with signing in, provide targeted ads, and analyse site operations.

You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of Our Site.

#### CHANGES TO THIS DATA PROTECTION PRIVACY POLICY

It is also important that you check back often for updates to the Policy, as We may change this Policy from time to time. The “Date last updated” legend at the bottom of this page states when the Policy was last updated and any changes will become effective upon Our posting of the revised Policy.

We will provide notice to you if these changes are material and, where required by applicable law, We will obtain your consent. We will provide this notice by email or by posting notice of the changes on Our website.

#### CONTACT US / FURTHER INFORMATION

To contact Us about anything to do with your personal data and data protection, including to make a subject access request, please use the following details:

For the attention of: Chief Operating Officer  
Email address: info@tencendurcap.com  
Postal address: Tencendur Capital LLP  
20 North Audley Street  
London  
W1K 6WE  
United Kingdom

If you have any questions regarding the collection, processing, or use of your Personal Information or if you wish to correct, block, rectify, object, access, revoke your consent to any applicable aspect of this Policy or delete any of your Personal Information, please contact us.

**Date last updated: May 2018**