



Your personal data and privacy are important to us.

This privacy notice (“**Privacy Notice**”) applies to the processing of personal data in connection with the provision of our website at <http://www.epiris.co.uk> (the “**Site**”), and all of the services that we offer, including from the Site (“**Services**”).

We are committed to safeguarding your personal data and protecting your privacy. This Privacy Notices explains how we achieve that by describing the following:

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Section 1: How this privacy notice applies to you

This privacy notice applies to you as:

- a visitor to our Site;
- a 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
- a visitor to our offices;
- an attendee at one of our events; and/or
- other third parties who deal with us and their personnel.

This Privacy Notice replaces all similar privacy policies and notices, cookie 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 Notice. 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. We are not responsible for the data protection or privacy policies of those third parties, and this Privacy Notice does not apply to your interaction with services provided by third parties.

Section 2: Who the controller of your personal data is

The Site is made available by Epiris LLP (“**Epiris**”, “**we**”, “**us**”, “**our**”).

We are 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.

Epiris LLP is an English company (registration number: OC412384) and our registered office is at Forum St Pauls, 33 Gutter Lane, London EC2V 8AS.

Our other firm Epiris Managers LLP, will also be a controller of your personal data that we collect as part of any investment process that we become involved in.

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, marked 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 living 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:

IN RELATION TO USE OF OUR SITE

- 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, your interaction with the Site, 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.

IN RELATION TO A POTENTIAL OR ACTUAL INVESTMENT

- 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.

Further information about types of personal data collected from specific categories of people are set out in Section 5.

References throughout this privacy notice to your personal data are to all the types of personal data listed within Section 4 and 5 that apply to you and any other types that we collect from you.

Section 5: Who do we collect personal data about?

We collect and process personal data from the following people:

1 SITE VISITORS

If you browse our Site, contact us with an enquiry through our Site, submit a complaint through our Site or use any services available on our Site, we will collect and process your personal data in connection with your interaction with us and our Site.

2 PERSONNEL THAT WORK FOR THE COMPANIES WE INVEST IN

If you are a 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, we may process personal data about you in connection with our proposed investment.

3 VISITORS TO OUR OFFICES

If you attend our offices, we may process personal data that you volunteer in connection with your visit, and any enquiries you make. For example, you may volunteer personal data when signing in as a guest. CCTV footage may also be collected for security purposes.

4 EVENT ATTENDEES

If you attend one of our events, we will process personal data about you in connection with your attendance at the event. For example, we may ask you to complete a registration or feedback form, or another document relating to the event.

5 OTHER THIRD PARTIES WHO DEAL WITH US AND THEIR PERSONNEL

If you (or your organisation) deal with us, we may collect and process your personal data in connection with those dealings. This may include personal data included in any email or telephone communications or recorded on any document relating to the dealings.

Section 6: Where do we source your personal data, and how?

We collect and receive personal data using different methods:

1 PERSONAL DATA YOU PROVIDE TO US

We will primarily collect your personal data directly from you when you visit our websites, and when you give us your personal data directly. This will be the case when, for example, you contact us with enquiries, complete forms on our Site, visit our offices, subscribe to receive our marketing communications or provide feedback to us.

2 PERSONAL DATA YOUR EMPLOYER PROVIDES TO US

Where you are a shareholder, director or senior member of staff of a business into which we are considering making an investment, we may collect personal data about you from the business you work for.

3 PERSONAL DATA WE COLLECT USING COOKIES AND OTHER SIMILAR TECHNOLOGIES

When you access and use our Site, we will collect certain technical information about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies (see our "Cookie Policy" section below).

4 PERSONAL DATA RECEIVED FROM THIRD PARTIES

From time to time, we will receive personal data about you from third parties. Such third parties may include analytics providers, and third parties that provide technical services to us so that we can operate our Sites and provide our Services.

5 PUBLICLY AVAILABLE PERSONAL DATA

From time to time we may collect personal data about you (including your contact details, biography, interests or affiliations) from publicly available sources (including open source data sets), media reports or that you or a third party may otherwise make publicly available (for example through speeches at events or publishing articles or other news stories or posts on social media platforms, such as LinkedIn).

Section 7: Who do we share your personal data with?

We will only share personal data with others where we are legally permitted to do so. When we share personal data with others, we put contractual arrangements and security mechanisms in place to protect the personal data shared and to comply with our data protection, confidentiality and security standards and obligations.

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

1 THIRD PARTIES AND THIRD-PARTY ORGANISATIONS THAT PROVIDE APPLICATIONS/FUNCTIONALITY,

DATA PROCESSING OR OTHER SERVICES TO US, INCLUDING:

- identity verification organisations;
- background checking organisations;
- your referees;
- software as service providers;
- data back-up service providers; and
- any other third party service providers.

Third-party email marketing and CRM specialists: We share personal data with specialist suppliers who assist us in managing our marketing database and sending out our email marketing communications.

2 AFFILIATES

These include Epiris Managers LLP, and any other entity that we may establish or purchase from time to time.

3 OUR PROFESSIONAL ADVISORS

We share personal data with professional service firms and our professional advisers, including our lawyers, auditors and accountants, who advise us and assist in relation the lawful and effective management of our organisation and in relation to any disputes we may become involved in.

4 LAW ENFORCEMENT OR OTHER GOVERNMENT AND REGULATORY AGENCIES AND BODIES

We share personal data with law enforcement or other government and regulatory agencies or other third parties as required by, and in accordance with, applicable law or regulation.

5 SHARING WITH OTHER THIRD PARTIES

Occasionally, we may receive requests from third parties with authority to obtain disclosure of personal data, such as to check that we are complying with applicable law and regulation, to investigate an alleged crime, or to establish, exercise or defend legal rights. We will only fulfil requests for personal data where we are permitted to do so in accordance with applicable law or regulation.

This list is non-exhaustive and there may be circumstances where we need to share personal data with other third parties in order to operate our Site.

Section 8: What are the purposes and the legal grounds for our collecting, handling and sharing of your personal data?

Purpose/Activity	Types of personal data	Legal basis/grounds for handling
To provide you or your organisation with our Services that you have requested from us via our Site or otherwise.	Contact information Personal details	It is necessary for us to use your personal data to perform our obligations in accordance with any contract that we may have with you, or it is in our legitimate interest or a third party's legitimate interest to use personal data in such a way to ensure that we provide our services in an effective, safe and efficient way.

<p>For the purposes of:</p> <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. 	<p>Contact Information Personal details Professional and educational information Role details Financial details</p>	<p>The processing is necessary for the legitimate interest of assessing whether or not we will invest in the business you are connected to.</p>
<p>For the purposes of:</p> <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. 	<p>Contact information Personal details Professional and educational information Role details Financial details</p>	<p>The processing is necessary for compliance with a legal obligation to which we are subject.</p>
<p>For certain other business administration and legal compliance purposes, including:</p> <ul style="list-style-type: none"> • enforcing our legal rights; • protecting rights of third parties; and • in connection with a business transition such as a merger, reorganisation, acquisition by another company, or sale of all or a portion of our assets. 	<p>Contact information Personal details Professional and educational information Role details Financial details Technical information</p>	<p>It is in our legitimate interests to use your personal data in this way.</p>
<p>Where you submit content to us, such as quotes or testimonials, we may process any personal data comprised within that content for the purposes of making it available on our Site and promoting our services.</p>	<p>Name and job title</p>	<p>It is in our legitimate interests to use your content in this way.</p>
<p>To enable us to respond to an enquiry or other request you make when you contact us via our Site.</p>	<p>Contact information Personal details Technical data</p>	<p>It is in our legitimate interest to use your personal data in this way, to ensure that we can respond to an enquiry or provide you with information that you have requested, and so that we are able to provide a good standard of service to you.</p>

<p>To invite you to provide feedback about us, our services, and our Site, in the form of an online or email survey.</p>	<p>Contact Information Any other personal data you choose to volunteer in your survey response or feedback.</p>	<p>It is in our legitimate interest to use the personal data provided by you so that we can improve our Services and provide them in an effective way</p>
<p>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. We use cookies, other similar technologies (which we generically refer to as “Cookies”) to collect data from the device(s) that you use to access our Site.</p>	<p>Technical data, including your IP address, a session ID, and other information about your interaction with our Site.</p>	<p>Where your data is collected through the use of Cookies, we rely on consent to collect your data. Please see the “Cookie Policy” section below for further details.</p> <p>Where we use this personal data to analyse how you use our Site, it is in our legitimate interest to use your personal data to offer our website visitors the best experience we can, and to improve our Site</p>
<p>For marketing activities, including email marketing: to send you, or the organisation you represent, marketing communications by email, including press releases and general information about our organisation, and the events we may host from time to time.</p>	<p>Contact information Personal details</p>	<p>We will only send you email marketing where you have consented to it, and you can withdraw your consent at any time.</p>
<p>To organise and manage events that we may host and to invite you to such events. If you attend one of our events, we may use your personal details to record your attendance, and for related record-keeping purposes. You may also feature in photographs taken at our events, and subsequently in publications that we make available.</p>	<p>Contact Information Personal details.</p>	<p>It is necessary for us to use your personal data in this way to perform our obligations in accordance with any contract that we may have with you where you have signed up to attend an event, or it is in our legitimate interest or a third party’s legitimate interest to use personal data in such a way to ensure that the event is operated in an effective way.</p> <p>We ask your permission to use your photographs and/or quotes and testimonials, and where this is the case, our processing of your personal data will</p>

		be based on your consent.
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Section 9: What happens if you fail to provide your data?

Where we are required by law to collect your personal data, or we need to collect your personal data under the terms of a contract we have with you, and you fail to provide that personal data when we request it, we may not be able to perform the contract we have or are trying to enter into with you.

This may apply where you do not provide the personal data we need in order to provide the services you have requested from us. In this case, we may have to cancel the provision of the relevant services to you, in which case we will notify you.

Section 10: How do we obtain your consent?

Where our use of your personal data requires consent, you can provide such consent:

- at the time we collect your personal data following the instructions provided; or
- by informing us using the contact details set out in the 'How to contact us' section above

Section 11: 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 (see the 'How to contact us' section above).

Section 12: How long will we keep your personal data for?

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

If you have opted out of receiving marketing communications from us, we will need to retain certain personal data on a suppression list indefinitely so that we know not to send you further marketing communications in the future.

In some circumstances, you may ask us to delete your personal data. Please see the 'Your rights in respect of your personal data' section below for further information.

Section 13: Transferring your personal data outside of the UK or the European Economic Area ("EEA")

Where necessary in order to operate our Site and to otherwise deliver our Services, we may transfer personal data to countries outside the UK and/or EEA.

Non-EEA or UK countries do not have the same data protection laws as the EEA and UK. In particular, non-EEA and UK countries may not provide the same degree of protection for your personal data, may not give you the same rights in relation to your personal data and may not have a data protection supervisory authority to help you if you have any concerns about the processing of your personal data.

However, when transferring your personal data outside the EEA or UK, we will comply with our legal and regulatory obligations in relation to your personal data, including having a lawful basis for transferring personal data and putting appropriate safeguards in place to ensure an adequate level of protection for the personal data.

We will take reasonable steps to ensure the security of your personal data in accordance with applicable data protection laws. When transferring your personal data outside the UK or the EEA, we will ensure that, where required by applicable law, at least one of the following safeguards is implemented:

Adequacy decisions: We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission. For further details, see https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/adequacy-protection-personal-data-non-eu-countries_en.

Model clauses: Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe. For further

details, see https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/model-contracts-transfer-personal-data-third-countries_en.

EU-U.S. Privacy Shield: Where we have partners or suppliers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between Europe and the US. For further details, see https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/eu-us-privacy-shield_en.

Please contact us if you would like further information on the specific mechanisms used by us when transferring your personal data outside the EEA

Section 14: 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 15: 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 copies of your personal data and to obtain information about how we handle and process it. If you require additional copies, we may charge a reasonable fee for producing those;
- **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** – you can ask us to delete or remove your personal data in some circumstances, such as where we no longer need it or where you have withdrawn your consent (where applicable). This is also known as the “*right to be forgotten*”;
- **Right to restrict handling and processing** – you can ask us to block or suppress your personal data file in certain circumstances, such as where you contest the accuracy of that personal data, or you object to us processing it for a particular purpose. This may not mean that we will stop storing your personal data, but where we do keep it, we will tell you if we remove any restriction that we have placed on your personal data to stop us processing it further;
- **Right to move, copy or transfer**– you have the right, in certain circumstances, to obtain personal data you have provided to us, and ask us to transfer your personal data to another organisation, also known as “*data portability*”;
- **Right to object** – you can ask us to stop processing your personal data for certain purposes, and we will do so if we are:

- relying on our own or someone else's legitimate interest to process your personal data, except if we can demonstrate compelling legal grounds for the processing; or
 - processing your personal data for the purposes direct marketing;
- **Right to withdraw consent** – if we rely on your consent as our legal basis for processing your personal data, you may withdraw any consent or permission that you have previously provided to us at any time. You can exercise this right by contacting us using the details in the 'How to contact us' section above, or by using any other opt-out mechanism we may provide;
 - **Rights in relation to automated decision making** – you have the right not to be subject to a decision when it is based on automatic processing, including profiling, where such automated decision making has a legal effect on you or otherwise significantly affects you, unless such profiling is necessary for the entering into or performance of a contract between you and use; 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.

If you have a concern about any aspect of our privacy practices, including the way we have handled your personal data, please contact us using the contact details provided in the 'How to contact us' section above.

You can also report any issues or concerns to a national supervisory authority in the Member State of your residence or the place of the alleged infringement. You can find a list of contact details for all EU supervisory authorities at:

http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm.

As we are incorporated in the UK, our regulatory authority is <https://ico.org.uk>.

Procedure to exercise your legal rights

- **Contact us** – if you wish to exercise any of your legal rights please contact us (see the 'How to contact us' section above). 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 16: 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 (see the ‘How to contact us’ section above).

Can I request that you stop using my personal data? – you have legal rights in respect of your personal data. Please refer to Section 15 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 17: Cookie Policy

This section is intended to inform you how we use Cookies and similar technologies on our Site, and in connection with the Service, and to assist you in making informed decisions when using our Site and Services.

What are cookies or similar technologies?

Cookies and similar technologies (which we will collectively refer to as “**cookies**”) are small text documents or pieces of code, which often include an anonymous unique identifier.

When you visit a website or use a mobile application, a computer asks your computer or mobile device for permission to store this file on your computer or mobile device and access information from it. Information gathered through cookies may include the date and time of visits and how you are using the particular website or mobile application.

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.

We use first and third party cookies in connection with our Service. First party cookies are cookies placed by us to collect information about you. However, certain cookies available through our Service are placed by third party website operators. This means that the information about you collected by those third party cookies will be shared with the relevant third party. Please refer to the relevant third party website operator's privacy notice for more information about how they may use such information.

For more details on cookies and similar technologies, please visit [All About Cookies](#).

Removing and disabling cookies

Please be aware that in order to use some parts of our Site you will need to allow certain essential cookies. If you subsequently block or delete those cookies, some aspects of our Site may not work properly, and you may not be able to access all or part of our Site.

You can opt-out of each cookie category (except Essential cookies) by clicking on the “cookie settings” link in the footer of our Site.

Cookies used on our site

(i) Essential Cookies

These cookies are essential for the operation of a website. Essential cookies include cookies such as login cookies and load balancing cookies that ensure the content of your page loads quickly. You can set your browser to block or alert you about these cookies, but some parts of the site will not then work. These cookies do not store any personally identifiable information.

Cookie Subgroup	Cookies	Cookies used
www.epiris.co.uk	<u>OptanonAlertBoxClosed</u> , <u>OptanonConsent</u>	1st Party
www.epiris.co.uk	<u>__RequestVerificationToken</u> , <u>ARRAffinitySameSite</u> , <u>ARRAffinity</u>	1st Party

(ii) Analytics Cookies

These cookies allow us to count visits and traffic sources so we can measure and improve the performance of our site. They help us to know which pages are the most and least popular and see how visitors move around the site. All information these cookies collect is aggregated and therefore anonymous. If you do not allow these cookies we will not know when you have visited our site and will not be able to monitor its performance.

Cookie Subgroup	Cookies	Cookies used
www.epiris.co.uk	<u>_gat</u> <u>gtag</u> <u>xxxxxxxxxxxxxxxxxxxxxxxxxxxx</u> , <u>_gid</u>	1st Party
www.epiris.co.uk	<u>_ga</u>	1st Party
www.vimeo.com	vuid	3rd Party

Consent to use cookies

Non-essential Cookies – We may only store and access non-essential cookies on your device with your permission. You are not obliged to give consent to our use of non-essential cookies. Further, if you give your consent and then change your mind you can block or delete them (see above).

Essential Cookies – Please note that we do not need your consent to store and access essential cookies on your device, although you can still block or delete them (see above).