

Trimontium Capital Limited

Investments Privacy Notice

This Privacy Notice is provided by Trimontium Capital Limited (“Trimontium”, “we”, “us” or “our”). In connection with an investment that one or more of the investment funds, managed accounts or other investment vehicles that we advise are considering, directly or indirectly, or otherwise lending to or taking a position in by way of a security, instrument or otherwise (an “Investment”), we may process personal data about individuals connected with an Investment (“you”, or “your”). This Privacy Notice aims to provide you with information about the categories of personal data we may collect, how we collect it, what we use it for and with whom we share it in accordance with data protection legislation. Please provide a copy of this Privacy Notice to all individuals whose personal data we may process in connection with an Investment.

“Personal data” means any information relating to you but does not include data where you can no longer be identified from it such as anonymised aggregated data.

We will be a data controller in respect of your personal data we process. A data controller is responsible for deciding how to hold and use personal data about you. We may process your personal data ourselves or through others acting as data processors on our behalf.

We may provide supplemental privacy notices on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your personal data. These supplemental notices should be read together with this Privacy Notice.

If you have any questions about this Privacy Notice you can contact notices@trimontium.com.

What information do we collect about you and what do we use it for?

Personal data held by us or on our behalf may include, but is not necessarily limited to, your name, residential address, place of business, email address, other contact details, corporate contact information, signature, nationality, country of residence, place of birth, date of birth, employment and job history, education details, regulatory status, correspondence records, passport number, national identification number, certain financial information contained within KYC documents.

The purposes for which we may collect, store and use personal data about you and our ‘lawful basis’ for processing such data are set out in the table below. The law specifies certain ‘lawful bases’ for which we are allowed to use your personal data.

Purpose	Lawful basis for processing
To facilitate an assessment of any investment with which you are connected including but not limited to assessing the investment prospects of the investment and undertaking due diligence.	Compliance with applicable legal obligations. Our legitimate interests in conducting our business in a proper manner.
Where relevant, for the purpose of taking steps to enter into or for performing a contract with you or a business with which you are connected, such as for the purpose of facilitating a loan, collection of interest, fees, principal repayments or other amounts due.	Performance of a contract or to take steps prior to entering into a contract. Our legitimate interests in conducting our business in a proper manner.
To comply with any legal obligation imposed on us or otherwise take such steps as form part of generally accepted principles of good practice, such as anti-money laundering and anti-terrorist financing and fraud prevention purposes.	Compliance with applicable legal obligations. Our legitimate interests in conducting our business in a proper manner.
For our legitimate business interests such as for day to day operational and business purposes and business management and to maintain our records.	Our legitimate interests in conducting our business in a proper manner.
To monitor the investment with which you are connected including undertaking valuations.	Our legitimate interests in conducting our business in a proper manner.

In addition to the uses above, please note that we may also process your information where we are required by law to do so or if we reasonably believe that it is necessary to protect our rights and/or to comply with judicial or regulatory proceedings, a court order or other legal process.

Special categories of personal data

There are more limited bases for processing special category personal data. This is personal data which reveals or contains racial or ethnic origin, political opinions, religious and philosophical beliefs, trade union membership, genetic data, biometric data, health data, sex life and sexual orientation. Similarly, there are fewer bases for processing criminal convictions and offences data.

Whilst we will use reasonable efforts to limit our holding of special category data, please be aware that we may hold such data incidentally. For example, where:

- you volunteer such data to us or one of our processors, such as if you send us an email containing such data; or
- documents gathered for legal / regulatory purposes containing such data, such as a passport copy which references ethnic origin or a due diligence search from public sources which includes such data.

What if you do not provide the personal data requested?

In some circumstances, if you do not provide us with certain information when requested, we may be limited or restricted in our ability to deal with you and may in some cases be prevented from complying with our legal obligations. Where we require your personal information to comply with anti-money laundering or other legal requirements, failure to provide this information means we may not be able to proceed with the potential investment with which you are connected.

Change of purpose

We will only use your personal data for the purposes for which we collected it (as identified in the 'Purpose' column above), unless we reasonably consider that we need to use it for another reason which is compatible with the original purpose. If we need to use your personal data for an unrelated purpose, we will notify you and explain the legal basis relied upon.

How do we collect this information?

We typically collect personal data about you when you provide information to us or others acting on our behalf when communicating or transacting with us in writing, electronically, or by phone. For instance, when you send us KYC forms and documents or otherwise correspond with us.

In addition, we may receive personal data about you from third parties, such as:

- public sources or information vendors;
- your service providers.

With whom will we share your information?

We may share your personal data with a third party for the purposes described above, including where this is required by law, where it is necessary to progress the proposed investment with which you are connected or perform our contract in respect of it, where we have another legitimate interest in doing so, or otherwise with your consent.

We may need to share your personal data with:

- potential acquirors;
- investors in investment funds, managed accounts or other investment vehicles that we manage;
- cloud service and technology providers;
- professional advisers including lawyers, bankers, auditors and insurers to the extent such information is relevant to their performance of their services;
- our service providers and those appointed to the funds where we act as investment manager, including fund administrators and depositaries where such information is relevant to their performance of such services;
- managers or directors of any funds; and
- regulators.

We may share your personal data with third parties, for example in the context of a potential sale or restructuring of the investment with which you are connected. We may also need to share your personal data with a regulator or to otherwise comply with applicable law or judicial process or if we reasonably believe that disclosure is necessary to protect our rights and/or to comply with judicial or regulatory proceedings, a court order or other legal process.

We may transfer the personal data we collect about you to countries outside of the European Economic Area (“EEA”) and UK where the parties listed above are based for the purposes outlined in the table above. Those countries may not have the same standard of data protection laws as the EEA or the UK.

Where this is the case, we will (or will require a processor to) put in place appropriate safeguards such as approved standard contractual clauses designed to treat your personal data in a manner that is consistent with and respects the EEA and UK laws on data protection, or otherwise select an appropriate derogation to rely on. If you require further information about this you can request it from notices@trimontium.com.

How long will we retain your information?

We will retain your personal data for as long as necessary to fulfil the purposes for which it was collected, including for the purposes of satisfying any legal, regulatory, accounting or reporting requirements and our legitimate interests in maintaining such personal information in our records. This will normally include any period during which we are dealing or expect to deal with you and what we consider to be a suitable period thereafter for our internal record-keeping purposes. In doing this we will have regard to 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, and the applicable legal requirements. Generally, we will keep information relevant to our dealings with you for seven years following the completion of the relevant transaction or longer as required by applicable law or regulation.

In some circumstances your personal data may be anonymised so that it can no longer be associated with you, in which case it is no longer personal data.

Once we no longer require your personal data for the purposes for which it was collected, we will securely destroy your personal data in accordance with applicable laws and regulations.

Accuracy of information

It is important that the personal data we hold about you is accurate and current. Please let us know if your personal data which we hold changes during your relationship with us.

Your rights in relation to your information

You have rights as an individual which you can exercise in relation to the information we hold about you under certain circumstances. These rights are to:

- request access to your personal data (commonly known as a “data subject access request”) and request certain information in relation to its processing;
- request rectification of your personal data;
- request the erasure of your personal data;
- request the restriction of processing of your personal data;
- object to the processing of your personal data;
- request the transfer of your personal data to another party.

If you exercise one or more of the above rights we may be unable to complete the relevant transaction/investment with which you are connected.

If you would like to exercise one of these rights please contact notices@trimontium.com. You also have the right to make a complaint at any time to a supervisory authority for data protection issues.

Fees

You will not usually 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 for access is manifestly unfounded or excessive. Alternatively, we may refuse to comply with the request in such 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 the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal data is not disclosed to any person who has no right to receive it.

Right to withdraw consent

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal data for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact notices@trimontium.com. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose(s) to which you originally consented unless we now have an alternative legal basis for doing so, or we are required to retain your data for a legal or regulatory purpose.

Changes to this privacy notice

We reserve the right to update this Privacy Notice at any time, and we will make an updated copy of such Privacy Notice available to you and notify you when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal data.

Further information

This Privacy Notice was written with brevity and clarity in mind and is not an exhaustive account of all aspects of our collection and use of personal data. If you require any further information, please do not hesitate to contact notices@trimontium.com.