

GDPR Privacy Notice

Data protection privacy notice

We are committed to protecting your personal information and ensuring we respect your privacy. This Privacy Notice explains how we will look after and use any personal information that we collect about you.

What is personal information?

Personal information means any information about you from which you can be identified. Examples of personal information include your name, home address, national insurance number, date of birth, telephone number and e-mail address but it also includes other pieces of information which can be used to identify you, either directly or indirectly, such as a cookie.

Who we are

Enclude Ltd is the Controller of the personal information you provide to us (including to our affiliates Enclude BV and Enclude Capital Advisory UK Limited). If you have any questions about this Privacy Notice or the information we hold about you, please contact us using the details set out below:

Full name of legal entity: Enclude Ltd

Email address: info@encludesolutions.com

Postal address: 1200 18th St NW, Suite 700, Washington, DC 20036, United States

Contact telephone numbers: +1 202-822-9100

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues. We would however appreciate the chance to deal with your concerns before you approach the ICO, so please contact us in the first instance.

What types of information do we use?

We collect information in the course of providing our advisory services to you. The information which we collect, use, store and transfer about you are employment details (job title, company name, address etc.) and contractual/contact information (i.e. our 'history' together – services provided or discussed).

We do not collect any special categories of personal data. 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 or biometric data.

Consequences of not providing some types of information

Where we need to collect your personal information by law, or under the terms of a contract we have with you, and you fail to provide that information when requested, we may not be able to provide the goods or services you asked for. In this case we may have to cancel our services to you, but we will tell you if this is the case.

How do we collect information about you?

Typically we will collect information from you when you contact us directly or provide information in order for us to provide our services. We collect information from and about you in the following ways, primarily through direct interactions when you:

- Give us your personal information by filling in forms or during correspondence with us, including when you enter into a contractual obligation with us; or
- Provide details when we meet in person.

How we will use your personal information

We only obtain, use and keep personal information where we need it for a specific purpose. We are only able to use your personal information if we have a proper legal reason or basis for doing so. This is called a legal basis and the regulations require that we have a legal basis so that your privacy is protected.

Most commonly we will use your information in the following ways:

- We have a **contract** with you for providing consulting or advisory services.
- We have a **legal obligation**. We need to use your personal information to comply with laws that assist in the prevention of crime and to comply with regulatory obligations. For example this might include confirming your identity and source of wealth, as well as ensuring we provide you with necessary information so you understand the risk of the advisory services we can provide.
- We, or a third party, have a **legitimate interest** in processing the information and your interests and fundamental rights do not override those interests. For example, processing your information to source deals or manage an advisory project.

We process the personal data of a wide variety of business contacts for the purposes of conducting key parts of our business, such as providing consulting and transaction advisory services. The lawful basis for processing such information is that this is necessary for our legitimate interests – to conduct our business.

We will only use your personal information for the reason for which we collected it. We will only use it for another reason if we believe that new reason is compatible with the original purpose. If we do need to use your personal information for a non-related purpose we will tell you about it and explain the legal basis which allows us to do so.

Who we share your information with

We may need to provide information to third parties for a variety of reasons, for example, we may need to provide information to assist in the detection or prevention of crime or for the purpose of safeguarding national security.

Sending your information outside of the EEA

The regulations which have been put in place to protect your privacy apply throughout the EEA. All the personal information that we hold about you will be processed in the EEA, or in the US, which is deemed to maintain sufficient data protection standards.

Storing your information

In certain situations, such as where we have a contract with you in the context of a consulting or advisory mandate, we will need to keep your personal information (updated to ensure accuracy) to fulfil our contract. We also need to comply with EU and UK law, which often requires us to keep certain records - which will include certain personal information – for several years.

Our policy is to keep records on prospective clients, investors, management teams and other business contacts indefinitely as we may wish to contact long standing contacts about a particularly relevant opportunity in the future, and in the context of our business there is no way to predict when such an opportunity might arise. We will ensure all records are safely destroyed if we no longer need to retain them. We review our retention periods for personal information on a regular basis. We will tell you if we change the retention period.

Your rights

You are provided with a number of different rights under the data protection laws in relation to your personal information. These allow you to:

- Access your information;
- Request we correct your information;
- Request that we erase your information;
- Object to the processing of your information;
- Request a restriction in the processing of your information;
- Request a transfer of your information;
- Complain to the Information Commissioner's Office; and
- Withdraw your consent.

If you wish to exercise any of these rights please let us know by e-mail on info@enclodesolutions.com. Please note that you will not have to pay a fee to access your personal information or to exercise any of the other rights. We may, however, charge a reasonable fee if your request is clearly unfounded, repetitive or excessive or we may refuse to deal with your request. We may also need to seek further information from you to confirm your identity before we release any personal information. This does not affect your right to make a complaint.
