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## Privacy Notice

This Privacy Notice sets out how your personal data is collected, processed and disclosed in connection with Hadrian's Wall Secured Investments Limited (the "**Fund**").

We take privacy and security of your information seriously and will only use such personal information as set out in this Privacy Notice.

The Fund collects personal data from (prospective) clients and investors, business partners and intermediaries (each a "**Relevant Person**") for the purposes of entering into a contract or a service agreement and/or to meet certain legal requirements. Your personal information may be provided to the Fund, which will act as a data controller in respect of such personal data, Praxis Fund Services Limited (the "**Administrator**"), Link Market Services (Guernsey) Limited (the "**Registrar**"), International Fund Management Ltd (the "**Investment Manager**"), Hadrian's Wall Capital Limited (the "**Investment Adviser**") or other third parties the Fund authorises to process data for lawful purposes (the "**Processors**"). The Processors may process your personal information or such data in respect of your directors, officers, employees or beneficial owners. If you are a director, employee, investor or consultant of an entity that provides us with personal data on individuals connected to you for any reason in relation to your involvement with us, this will affect those individuals and you should transmit this document to those individuals or otherwise advise them of its content.

Your personal data may also be collected and processed by us as a result of your professional or family connection with a Relevant Person.

As the Fund is incorporated in Guernsey, the Fund is obliged to comply with the provisions of the Guernsey data protection laws.

This Privacy Notice should be read in conjunction with the Fund's website terms and conditions.

### 1 **Where we obtain your personal data:**

1.1 Your personal data comprises the following categories:

1.1.1 information related to identification (including name, signature, nationality, place and date of birth, passport number, residential address, email address and other contact details);

1.1.2 information required for payroll, benefits and expenses purposes;

1.1.3 employment history, income and personal wealth;

1.1.4 bank account details;

1.1.5 correspondence records;

1.1.6 professional qualifications, employment history, references and other details regarding your career history such as training records;

1.1.7 tax status and tax identification numbers; and

1.1.8 where necessary, information regarding your investment activity or health.

- 1.2 We primarily collect your personal data from the following sources:
- 1.2.1 from information which you or your authorised representative gives to us, including but not limited to:
- (a) information set out in any application to act or by virtue of you acting as a Relevant Person;
  - (b) such other forms and documents as we may request that are completed in relation to you acting as a Relevant Person, including in relation to the subscription for, or the administration/management of an investment in the Fund;
  - (c) any documentation that we may obtain as part of our regulatory requirements, including client due diligence for investors; and
  - (d) any personal data provided by you by way of correspondence with us by phone, e-mail or otherwise.
- 1.2.2 personal data we receive from you or any third party sources which may include:
- (a) entities in which you or someone connected to you has an interest;
  - (b) your legal and/or financial advisors;
  - (c) your relatives, trustees, personal representatives or shareholders;
  - (d) other financial institutions who hold and process your personal data to satisfy their own regulatory requirements;
  - (e) credit reference agencies and financial crime databases for the purposes of complying with our regulatory requirements; and
  - (f) information collected via our website (including cookies and IP addresses) and emails.
- 1.3 We may also collect and process your personal data in the course of dealing with advisors, regulators, official authorities and service providers by whom you are employed or engaged or for whom you act.

## **2 Why we collect your personal data:**

### **Lawful grounds for processing:**

- 2.1 We are entitled to hold and process your personal data on the following lawful grounds:
- 2.1.1 the processing is necessary for our legitimate interests, provided your interests and fundamental rights do not override those interests;
- 2.1.2 the processing is necessary for us to comply with our contractual duties to you under the terms of any contract which we have with you;

- 2.1.3 to comply with our legal and regulatory obligations;
- 2.1.4 (on exceptional occasions) where we have obtained your consent; and
- 2.1.5 (on rare occasions) where it is needed in the public interest.

Some of the grounds for processing described above will overlap and there may be several grounds which justify our use of your personal data.

#### **Inaccurate or Amended Information**

- 2.2 Please let us know if any of your personal data (including correspondence details) changes as soon as possible. Failure to provide accurate information or to update changed information may have a detrimental impact upon your directorship, employment or consultancy, including the processing of any payment due to you. Failure to provide information where the same is required for anti-money laundering, pursuant to automatic exchange of information agreements, or other legal requirements may mean that any payment due to you cannot be processed.

#### **Purposes of processing**

- 2.3 Pursuant to paragraph 2.1, we may process, store and use your personal data for the purposes set out below ("**Purposes**"). Those based wholly or partly on our legitimate interests are set out in paragraphs 2.3.1 to 2.3.7:
  - 2.3.1 to reflect your directorship, employment, investment or consultancy relationship with the Fund or with one of its service providers;
  - 2.3.2 to communicate with you as necessary in connection with your affairs and generally in connection with your directorship, employment, investment or consultancy relationship with the Fund or with one of its service providers;
  - 2.3.3 to operate the Fund's IT systems, software and business applications;
  - 2.3.4 to support our IT and business applications support teams, accounting, legal, reporting, internal audit and risk management, administrative, transfer, document storage, record keeping and other related functions, including but not limited to processing personal data in connection with the Fund;
  - 2.3.5 for service, training and related purposes;
  - 2.3.6 to monitor and record telephone and electronic communications and transactions:
    - (a) for quality, business analysis, training and related purposes in order to improve service delivery;
    - (b) for investigation and fraud prevention purposes, for crime detection, prevention, investigation and prosecution of any unlawful act (or omission to act); and
    - (c) to enforce or defend the Fund's rights, or through third parties to whom we may delegate such responsibilities or rights in order to comply with a legal or regulatory obligations imposed on us;

- 2.3.7 detecting and preventing crime such as fraud, money laundering, terrorist financing, bribery, corruption, tax evasion and to prevent the provision of financial and other services to persons who may be subject to economic or trade sanction on an ongoing basis ("**Regulatory Assessments**");
  - 2.3.8 facilitating the internal administration of each of the Processors and retaining your personal data as part of our Regulatory Assessments or future services entered into by you;
  - 2.3.9 liaising with or reporting to any regulatory authority (including tax authorities) with whom the Fund is either required to cooperate or report to, or with whom it decides or deems appropriate to cooperate, in relation to an investment, and which has jurisdiction over the Fund or its investments in a third country without the same or similar data protection laws as Guernsey or any EU member state (a "**Third Country without Adequacy**");
  - 2.3.10 disclosing your personal data to any bank, financial institution or other third party lender providing any form of facility, loan, finance or other form of credit or guarantee to the Fund;
  - 2.3.11 to carry out our obligations to you in connection with your directorship, employment or consultancy with the Fund or with one of its service providers;
  - 2.3.12 to discharge our anti-money laundering obligations to verify the identity of our directors, employees or consultants (or those of our service providers) or for prevention of fraud or for legal, regulatory or tax reporting purposes or in response to legal requests or requests from regulatory authorities (i.e. where it is necessary for compliance with a legal obligation to which we are subject). In discharging our anti-money laundering obligations we may, in certain circumstances, collect, store and process special categories of data such as information regarding criminal convictions;
  - 2.3.13 facilitating the internal administration of the Fund;
  - 2.3.14 communicating with our professional advisers for the purposes of obtaining professional advice;
  - 2.3.15 conducting business analytics and diagnostics;
  - 2.3.16 conducting credit reference checks;
  - 2.3.17 communicating with investors as necessary in connection with their affairs and generally in connection with their investment in the Fund; and
  - 2.3.18 communicating with investors about the performance of the Fund, including sending the Fund's annual and half yearly accounts ,fact sheets or other marketing information on the Fund.
- 2.4 We will only use your personal information 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 information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so. Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where these are required or permitted by law.

- 2.5 To the extent that such personal data contains special category data such as, for example: data relating to racial or ethnic origin, political opinion, religious or philosophical belief, trade union membership or criminal data then the processing of such data shall solely be for the purpose of complying with any duty imposed on the Fund by an enactment including, but not limited to, legislation and regulatory obligations relating to Anti-Money Laundering and Combatting the Financing of Terrorism and all other related legislation.
- 2.6 The Fund will not make decisions about you based on automated processing of your personal data.

### **3 Sharing personal data**

- 3.1 The Fund may share your personal data with group companies and third parties (including bank, financial institution or other third party lenders, IT service providers, auditors and legal professionals) under the terms of any appropriate delegation or contractual arrangement. Those authorized third parties may, in turn, process your personal data abroad and may have to disclose it to foreign authorities to help them in their fight against crime and terrorism.
- 3.2 Data processing (as described above) may be undertaken by any entity in the Bailiwick of Guernsey or the European Economic Area (the "EEA"), an entity which is located outside the Bailiwick of Guernsey or the EEA in a Third Country without Adequacy.
- 3.3 Any Third Country without Adequacy to which we transfer your data is legally not deemed in general to provide an adequate level of protection for your personal information. However, to ensure that your personal data receives an adequate level of protection we will put in place the following appropriate measures to ensure that your personal information is treated by those third parties in a way that is consistent with and which respects the EU laws and the laws of the Bailiwick of Guernsey on data protection. Any entity having access to your personal data outside Guernsey or the EEA will be required by binding legal contract to protect and only process your data as though it were in the EEA or Guernsey and subject to the same level of protection as applies in those territories.

### **4 Retention of personal data**

- 4.1 Your personal data will be retained for the longest of the following periods:
- 4.1.1 for the Processors and/or any authorised third parties to carry out the Purposes for which the data was collected or as long as is set out in any relevant agreement you enter into with us;
- 4.1.2 in order to establish or defend legal rights or obligations or to satisfy any reporting or accounting obligations;
- 4.1.3 seven years following the point from when the business relationship with the Fund has ceased; or
- 4.1.4 any retention period that is required by data protection laws and any applicable laws or regulatory requirements.

4.2 We endeavour and require all third parties with access to your personal data, to store such data securely on computer systems and/or manually in accordance with accepted market standards.

4.3 Whilst we have taken every reasonable care to ensure the implementation of appropriate technical and security measures, we cannot guarantee the security of your personal data over the internet, via email or via our websites nor do we accept, to the fullest extent permitted by law, any liability for any errors in data transmission, machine, software or operating error or any other cause.

## 5 **Your rights**

5.1 You have, under certain circumstances, the following rights in respect of personal data:

5.1.1 the right to access and port personal data;

5.1.2 the right to rectify personal data;

5.1.3 the right to restrict the use of personal data;

5.1.4 the right to request that personal data is erased;

5.1.5 the right to object to processing of personal data;

5.1.6 where the Fund has relied on consent to process the personal data, the right to withdraw consent at any time by contacting us via the contact details below;

5.1.7 the right to object to processing for direct marketing purposes; and

5.1.8 you have the general right to object to the processing of your data where we have considered this to be necessary for the purposes of our legitimate interests.

5.2 You also have the right to lodge a complaint with the Guernsey Data Protection Authority if you consider that the processing of your personal data carried out by the Fund or any other service provider to the Fund, has breached data protection laws. You may also appeal to certain courts against (i) any failure of the Guernsey Data Protection Authority to give written notice of whether the complaint is either being investigated or not being investigated and where applicable, the progress and the outcome of the investigation and (ii) a determination of the Guernsey Data Protection Authority not to investigate the complaint or a determination that a controller or processor has not breached or is not likely to breach an operative provision in connection with the complaint.

5.3 In limited circumstances we may approach you for your written consent to allow us to process certain particularly sensitive data or to use data for another purpose. 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 us at the contact details below. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

**6 How to contact us:**

If you have any questions about our use of your personal data, our retention procedures or our security processes, please contact:

Hadrian's Wall Secured Investments Limited

Sarnia House Le Truchot St Peter Port Guernsey GY1 1GR

Tel: +44 (0) 1481 737600

Email: [DPM.PFS.Guernsey@praxisifm.com](mailto:DPM.PFS.Guernsey@praxisifm.com)

**7 Changes to this Policy**

This Privacy Notice is dated 25 May 2018.

We reserve the right to amend this Privacy Notice at any time without notice, in which case the date of the policy will be revised.