

## **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, personal identification numbers, 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**

Siguler Guff UK LLP (“SGUK”) and Siguler Guff & Company, LP (“SGUS”) (together the “Group”, the “Firm”, “we”, “us”) are controllers of personal information you provide to us. SGUK is an affiliate of SGUS and in certain circumstances acts together with SGUS as joint controllers. If you have any questions about this Privacy Notice or the information we hold about you, please contact SGUK’s compliance team using the details set out below:

Full name of legal entity: Siguler Guff UK LLP

Name of relevant contact: Jocelyn Spencer

Email address: [jspencer@sigulerguff.com](mailto:jspencer@sigulerguff.com)

Postal address: Brookfield House, 4<sup>th</sup> Floor, 44 Davies Street, London W1K 5JA UNITED KINGDOM

Contact telephone numbers: +44 (0) 20 3771 4913

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, store, and transfer (“Process”) information in the course of providing our financial services to you. The information about you which we Process may include:

- Employment details (job title, company name, address etc.);
- Payment information (e.g. bank account);
- Employment or work history/background;
- Contractual/contact information (i.e. our ‘history’ together – services provided or discussed);
- Instructions or requests (for example if you ask for investment advice);
- Financial information (financial position and history);
- Documentary data (e.g. passport, driver’s licence or other forms of identification);
- Public records (or openly accessible data) such as the Electoral Register;
- Social and or demographic (profession, work, nationality, income)
- Historical information i.e. previous names and addresses;

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## 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 the product or services, 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 products and services. We collect information from and about you in the following ways:

Through **direct interactions** when you give us your personal information by filling in forms or during correspondence with us. This includes when you:

- Meet with us in person or talk to us face to face;
- Receive marketing materials from us;
- Complete questionnaires, for example, to give us feedback or provide additional information;
- Enter into a contract with us

Through **using our website** when we collect information using cookies or similar technologies which tell us about your equipment, browsing actions and patterns.

Through **third parties** such as fraud prevention agencies. We may also receive personal information from other companies and organisations such as placement agents, consultants or personal financial advisers. The third parties which we receive personal information from are as follows:

- Third party data sources such as Preqin
- Third party firms which provide background checks
- Publicly accessible sources, such as databases

## How we will use your personal information

We only obtain, use and keep personal information where we need it for a specific purpose. We set out in the table below the ways in which we plan to use your personal information. We are only able to use your personal information if we have a proper legal reason or basis for doing so. Regulations require that we have a legal basis so that your privacy is protected. The legal bases on which we rely include:

- We have a **contract** with you. For example, we have agreed to provide financial advice or to manage investments for you and have a contractual agreement to do this.
- We have a **legal obligation**. We need to use your personal information to comply with laws that assist in the prevention of financial 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 financial 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 prevent fraud.

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We set out in the table below all the ways we plan to use your personal information and the legal bases we rely on to do so. We also explain what our legitimate interests are where appropriate:

<b>Purpose</b>	<b>Lawful basis for processing including our legitimate interests</b>
To on-board you as a new customer	To fulfil our contact with you; To fulfil our legal obligations to prevent financial crime and the financing of terrorism
To manage your account	Necessary for our legitimate interests
To monitor your investment on an on-going basis	To fulfil our contract with you
To contact you about your investments	To fulfil our regulatory obligations
To contact you about other products and services we think you may be interested in	Necessary for our legitimate interests – to develop our products and services and grow our business.
To purchase services from our suppliers	To fulfil our contracts with suppliers

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.

## **Marketing**

We want to contact you about products or services we feel will be of interest to you or of benefit. We use your personal information to communicate with you if we have either your consent or a 'legitimate interest'. We believe that as a commercial enterprise we do have a legitimate interest in contacting you about our products or services and we will only do so if we decide it would be of interest or beneficial for you. However, if we are contacting you as a private individual we will also gain your consent to do so. If so, we will always ensure we seek consent from you in a way which is clear and explains why we are seeking consent to use your personal information. We will very clearly explain why we are seeking your consent and ensure that you are provided with a simple method of providing this.

**You are free to change your mind at any time by contacting the compliance team.**

Name: Jenna Beekman

Position: Compliance Associate

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Email: [jbeekman@sigulerguff.com](mailto:jbeekman@sigulerguff.com)

Address: 200 Park Avenue, 23rd Floor, New York, NY 10166 United States

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## Cookies

Cookies are small text files placed on your computer (or other device where you access the internet) used to collect information on your activities online. They can also be used as part of website functionality, for example, if you use our online services to access information about your investments with us, so you should be careful about accepting, deleting or removing them. Cookies allow us to collect information about the device you are using to access the internet, your IP address and website browser (for example). Cookies can tell us what information you viewed and for how long, the geographic location of your IP address, and your browsing history. We may use this information to analyse the usage of our services in order to improve our services and ensure we are delivering the right services to clients.

If you have concerns about cookies this web site explains how you can delete and control the cookies that are stored on your computer: <https://www.aboutcookies.org/>

## 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 management of your investments with us or the detection or prevention of crime. Please refer to the table in the section 'How we will use your personal information' which explains how we use your data. The third parties we share your information with are as follows:

- Other Group companies
- External legal counsel
- Auditors
- Our outsourced IT consultant firms
- Companies that assist us with processing your transactions such as custodians or administrators
- Firms that provide us with background checks for due diligence and anti-money laundering

## Sending your information outside of the European Economic Area (“EEA”)

The regulations which have been put in place to protect your privacy apply throughout the EEA. As explained in the section above, we may send your information to other third parties who are based outside of the EEA, however we will only share your information with them because the following safeguards have been put in place:

- The information is being transferred between organisations (in this case, organisations within the Group) which are engaged in the same economic enterprise, or within our corporate group, and we have an agreement in place which sets out how your privacy will be protected;
- The entities we transfer your information to are based in the US and are part of the Privacy Shield which requires them to provide a similar level of protection to European standards.

You can obtain further information on the specific mechanism used by us when transferring your personal information outside of the EEA by contacting the compliance team.

## Storing your information

The period for which we will retain personal information will vary depending on the purposes that it was collected for, as well as the requirements of any applicable law or regulation. When we decide

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how long we will retain your personal information, we will take into account the amount, nature, sensitivity of your information and how we want to use it as well as the potential risk of harm being caused from unauthorised use or disclosure. We review our retention periods for personal information on a regular basis and will ensure all records are safely destroyed if we no longer need to retain them or you have contacted us to request so.

## **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;
- To request we correct your information;
- To request that we erase your information;
- To object to the processing of your information;
- To request a restriction in the processing of your information;
- To request a transfer of your information; and
- To withdraw your consent.

If you wish to exercise any of these rights please contact our compliance team, referenced above. 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 to the ICO.

## **Security**

We have put in place appropriate security measures to protect your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. We have a procedure to deal with any suspected personal data breach and will notify you, and other regulators, where we are legally required to do so.