

Privacy Notice – Five Arrows Managers LLP

Why is this Privacy Notice important?

At Five Arrows Managers LLP (“**FAM LLP**”)¹, we are committed to protecting the privacy and security of your personal data. For the purposes of data protection law, FAM LLP is a *data controller* in respect of your personal data.

Transparency in how we handle your personal data is crucial. This Privacy Notice will inform you about how we collect, use, store and protect your personal data. It also sets out what your rights are and how you can exercise these rights.

Who does this Privacy Notice apply to?

This Privacy Notice applies to parties with whom we conduct our business (including clients/potential clients, counterparties, investors and our network of business contacts).

How to navigate this Privacy Notice

There is a section below on each of the following areas.

1. Personal data collected by FAM LLP
2. Uses of your personal data
3. Disclosure of your information to third parties
4. International transfers of your personal data
5. Retention of your personal data
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¹ FAM LLP is part of the Rothschild & Co group



1. Personal data collected by FAM LLP

FAM LLP will collect and use personal data about you which is useful or necessary for us by virtue of our relationship with you.

This may include information provided by you and may also include information that we, or other members of the Rothschild & Co group, collect about you, including information obtained from other sources. This may include the following:

- a) your title, name, address, phone number, email address, tax identification number and identity documents (for example, your driver's licence, passport and proof of address);
- b) your academic and professional background, performance and experience;
- c) financial and transactional information relating to you (for example, your compensation history and previous investments) and other details that you may provide in the course of the business relationship;
- d) personal data that we collect through your communication and correspondence with us (including but not limited to the content, date and time of your email correspondence, information about meetings attended);
- e) recordings and transcriptions of telephone calls, video calls and other electronic communications where we have a lawful reason to make such recordings and transcriptions (this may include where there is a regulatory requirement to record certain activity).

We may also collect and process personal data that we receive from, among others, the main following sources: publicly available and accessible registries and sources; bankruptcy registers, tax authorities, including those that are based in and outside the European Economic Area (EEA); governmental and competent regulatory authorities to which we have regulatory reporting obligations, credit agencies; and fraud prevention and detection agencies and organisations.

2. Uses of your personal data

Your personal data may be used by FAM LLP in the following ways:

- a) to operate our business and provide services to clients (including arranging transactions, providing a range of financial services, and performing FAM LLP's obligations under contracts);
- b) to communicate with investors (including arranging AGMs and other meetings and events);
- c) to conduct KYC and other due diligence as necessary for us to comply with anti-money laundering and anti-corruption laws and regulations and FAM LLP's related policies and procedures;
- d) to perform due diligence on and assess the performance of management teams and senior leadership of current and prospective investee companies;
- e) to engage in business relationship analysis, client relationship management and related purposes in order to improve service delivery to you or a client;
- f) to perform market research on a business or industry, including with the assistance of key experts;
- g) to engage in marketing and business development activity;
- h) to carry out risk assessments, and for risk reporting and risk management;
- i) for billing and invoicing purposes;
- j) to respond to checks and periodic reviews from regulators, correspondent banks, other financial firms, law firms, consultancies and other in-scope vendors/service providers and law enforcement (to enable them to comply with the relevant laws and regulations or undertake investigations as needed);



- k) to comply with Rothschild & Co's legal and regulatory obligations. This includes reporting to the relevant authorities, complying with anti-money laundering obligations and tax reporting obligations;
- l) to use it to prevent and respond to actual and potential fraud or illegal activities.

We are entitled to use your personal data in these ways because:

- a) **Consent:** we may (but usually do not) need your consent to use your personal data. Where this is relevant, you can withdraw your consent by contacting us (see the "Contact us" section below).
- b) **Performance of a contract:** we may need to collect and use your personal data to enter into a contract with you or to perform our obligations under a contract with you.
- c) **Legitimate interest:** we may use your personal data for our legitimate interests, some examples of which are given above.
- d) **Compliance with law or regulation:** we may use your personal data as necessary to comply with applicable law/regulation.

3. Disclosure of your information to third parties

Within the Rothschild & Co group

FAM LLP may disclose your personal data to other members of the Rothschild & Co group for the purposes of:

- a) providing the services or performing its obligations in connection with a client's contract;
- b) enabling the management and administration of the Rothschild & Co business; and
- c) for the management and administration of internal policies and procedures within Rothschild & Co including but not limited to policies and procedures to prevent financial crime and money laundering etc.

Where personal data is disclosed to other members of the Rothschild & Co group, we will take steps to ensure that the personal data is accessed only by those Rothschild & Co group personnel that have a need to do so for the purposes described in this Privacy Notice.

Outside the Rothschild & Co group

In addition to the above, FAM LLP (and the other members of the Rothschild & Co group to whom your personal data is disclosed) may share your personal data outside the Rothschild & Co group and may rely on other third parties for the processing of your personal data for the purposes described in this Privacy Notice, including:

- a) to third party vendors, service providers or contractors, bound by obligations of confidentiality, in connection with the processing of your personal data for the purposes described in this Privacy Notice. This may include outsourced client relationship management platforms, IT and communications service providers, law firms, accountants and auditors;
- b) to our clients in the ordinary course of business, where such sharing is necessary and lawful;
- c) to a regulator or law enforcement agency, if we are required to do so;
- d) to other financial institutions, tax authorities, professional associations, health insurance companies/funds, social security agencies, credit control agencies and/or debt collection agencies, where necessary;
- e) to certain regulated professionals such as lawyers, notaries', rating agencies or auditors under specific circumstances (e.g. litigation, audit, etc.) or insolvency administrators in case of private bankruptcy;



- f) to the extent required by law, regulation or court order, for example if we are under a duty to disclose your personal data in order to comply with any legal obligation.

Sharing your personal data with third parties may involve storing your personal data on the cloud, and some third parties provide services which involve the application of artificial intelligence.

4. International transfers of personal data

Your personal data may be transferred to and stored in databases hosted and maintained in a jurisdiction other than the UK. Such other jurisdictions may include destinations outside of the European Economic Area.

Where your personal data is transferred outside the UK, we will ensure that it is protected in a manner that is consistent with how your personal data will be protected by us in the UK. This can be done in a number of different ways, for example:

- a) the jurisdiction to which your personal data is sent might be approved by the UK Government as providing you with equivalent protections as in the UK; or
- b) the recipient might have signed a contract which incorporates “standard contractual clauses” or UK equivalent, obliging them to protect your personal data.

In other circumstances the law may permit us to transfer your personal data outside the UK.

You can obtain more details about the protection given to your personal data when it is transferred outside the UK by contacting us (see the “Contact us” section below).

5. Retention of personal data

How long we hold your personal data for will vary. The retention period will be determined by various criteria including:

- a) **the purpose for which we are using it:** we will need to keep the data for as long as is necessary for that purpose; and
- b) **legal obligations:** laws or regulation may set a minimum period for which we have to keep your personal data.

You can obtain more details about the retention of your personal data by contacting us in accordance with the “Contact us” section below.

6. Security of your personal data

We have implemented appropriate technical and organisational measures to ensure a level of security commensurate with the risks presented. These measures are designed to avoid a circumstance where personal data is accidentally or unlawfully destroyed, lost or altered, or inappropriately disclosed or accessed.



7. Your rights

You have a number of legal rights in relation to the personal data that we hold about you. You can exercise your rights by getting in touch with us (see the “Contact us” section below).

These rights include:

- a) **Right of access:** the right to obtain information regarding the processing of your personal data and access to the personal data which we hold about you;
- b) **Right to withdraw consent:** where we are processing your personal data on the basis of your consent, you have the right to withdraw your consent at any time. Please note, however, that we may still be entitled to process your personal data if we have another legitimate reason for doing so;
- c) **Right to portability:** in some circumstances, the right to receive the personal data which you have provided to us in a structured, commonly used and machine-readable format and/or request that we transmit those data to a third party where this is technically feasible;
- d) **Right of rectification:** the right to request that we rectify your personal data if it is inaccurate or incomplete;
- e) **Right of erasure:** the right to request that we erase your personal data in certain circumstances. Please note that there may be circumstances where you ask us to erase your personal data but we are legally entitled to retain it;
- f) **Right to restriction of processing:** the right to request that we restrict our processing of your personal data in certain circumstances. Please note that there may be circumstances where you ask us to restrict our processing of your personal data but we are legally entitled to refuse that request;
- g) **Right to object to processing:** the right to object to our processing of your personal data in certain circumstances. Please note that there may be circumstances where you object to our processing of your personal data but we are legally entitled to refuse that request;
- h) **Right to lodge a complaint with supervisory authority:** the right to lodge a complaint with the Information Commissioner’s Office (<https://ico.org.uk>) if you think that any of your rights have been infringed by us.

8. Changes to this Privacy Notice

We may need to update this Privacy Notice from time-to-time. We invite you to review the latest version of the Privacy Notice on our website (www.rothschildandco.com). You can also find the most up-to-date version of this Privacy Notice by contacting us (see the “Contact us” section below).

9. Contact us

If you would like further information on the collection, use, disclosure, transfer or processing of your personal data or the exercise of any of the rights listed in this Privacy Notice, please contact FiveArrowsPrivacy@rothschildandco.com.