



Data Protection Privacy Notice

Introduction

This is the Data Protection Privacy Notice of Aquarius Equity Partners Limited who may be referred to, in this document, as "Aquarius", "the Company" or "We".

Here at Aquarius we respect your privacy and are highly committed to protecting your personal data.

When we refer to "your" personal data we are referring to you personally and, where it is applicable, to any individuals who are connected to your investment such as personal advisors, trustees, accountants, personal assistants, those people listed on your expression of wish documents, consultants etc who you have informed us is authorised to receive such data.

The General Data Protection Regulation (GDPR) is the latest EU data privacy and protection framework which is effective from 25th of May 2018.

We are a private equity fund manager and to effectively deliver our services, we accept that we are a processor of personal data. We do not process any special categories of personal data as defined by GDPR.

We identify that the processing of such data is fundamental to the delivery of our services and commit to complying with data protection law which requires us to process personal data using the following principles;

1. It will be used lawfully and fairly;
2. It's use, storage and removal will be transparent;
3. It will be collected for valid purposes that have been clearly explained to you and not used for other purposes, unknown to you;
4. It will be accurate and kept up to date;
5. It will be kept securely; and
6. It will only be kept for as long as is necessary.

We are committed to GDPR compliance and take our obligations seriously by building them into our day to day and strategic processes, some of which you want to consider when conducting your assessment of Aquarius from a GDPR point of view.

Who to Contact

This Policy sets out basic information; however, you may have specific questions or wish to exercise your legal rights. Please use this or any of the contact details below;

Full Name	Aquarius Equity Partners Limited
GDPR Contact	Stephen Dunbar, Accountant
Head Office Address	Care of summ.it assist LLP, 2 nd Floor, 3 Hardman Square, Spinningfields, Manchester, M3 3EB
Telephone	0161 837 6207
e-mail	Stephen.dunbar@summ.it

If you believe that we have collected or processed your personal data incorrectly, you do have the right to make a complaint to the relevant body, the Information Commissioners Office (ICO) (www.ico.org.uk) however we would appreciate the chance to deal with your concerns and so please contact us in the first instance.

What is “Personal Data”?

Personal data means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

Special Categories of Personal Data

There are also special categories of personal data as identified by GDPR which includes information relating to; racial or ethnic origin, political opinions, religious or similar beliefs, trade union membership status, genetics, biometrics (for ID), physical or mental health, sexual life or sexual orientation and criminal activity, including alleged, proceedings, convictions or sentences. In general, we do not collect any Special Categories of Personal Data about you, unless you are a Candidate or an Employee of Aquarius, in which case a separate Applicant Privacy Notice and an Employee Privacy Notice are available upon request.

When Do We Collect and Process Personal Data?

We may collect and process personal data in a variety of ways, the main ways are identified below and are examples, but this may not be an exhaustive list.

When you;

- Interact with us directly via a telephone call, in-person discussion or at an event etc.
- Actively contact us through our website or social media channels;
- Become a prospective or actual investor;
- Apply for a work placement, work experience or job with us;
- Become an Employee;
- Work with us in a business relationship capacity such as a consultant, referrer, supplier or any other third party

When we refer to “us” this includes our third-party accountants, summ.it assist LLP.

Keeping it Accurate

In fulfilling our GDPR commitments, it's important that the personal data we hold about you is accurate and up to date. As such, please keep us informed of any changes so that we can update our records and maintain our all-important relationship with you.

The Types of Data we Collect

We may collect, use, store and transfer a variety of personal data about you during our relationship with you. We have attempted to group these together however, again this cannot be exhaustive;

Data Type	Includes
Account	The service we provide you and the terms of any such service including payments and transactions.
Contact	Addresses, e-mail, social media, telephone numbers
Financial	Bank accounts, statements and other payment records.
Identity Data	First names, surname, maiden name, usernames, marital status, title, date of birth, gender,

photographic ID, national insurance numbers,
passport details etc.

**Marketing &
Communications**

e-mail, social media identity, survey responses and
your preferences in what M&C information you wish
to receive from us.

Failing to provide Personal Data

Where we need to collect personal data by law or under the terms of a contract that we have with you, and you fail to provide the data when requested, we may not be able to perform the contract.

In such cases, having exhausted all avenues, we may be unable to start providing services or cancel the services however this will only occur following formal notification with an opportunity to rectify matters.

Reasons why we use your Personal Data and Consent

We will only use your Personal Data lawfully and most commonly when we need to perform the contract which we have entered into with you, where we need to comply with a legal or regulatory obligation or where it is necessary for our legitimate interests (and your interests do not override ours).

As such generally, except for some marketing activities, we do not rely upon consent as a legal basis for processing your Personal Data.

Marketing

We do not share your personal data with any other company for marketing purposes but in the unusual event that we do, we will obtain your express consent for this.

If you are on our mailing list, you have a clear and easy way to opt out at any time. If you opt out of marketing and communication with us, then we will continue to process your personal data in the provision of our services and your e-mail address will be retained, but not used, on our chosen online mailing software for record keeping purposes unless you specifically request for this to be deleted.

Disclosure of your Personal Data

We may have to share your Personal Data for the purposes of providing our services.

These include, but this list is not exhaustive;

- Professional Advisers acting as processors including accountants, lawyers, insurance brokers, tax specialists, auditors, insurers, business consultants, recruitment agents, banks and insurers, based in the UK, who provide consultancy, banking, legal, insurance and accounting services;
- HM Revenue & Customs, Regulators, Money Laundering Agents and other authorities based in the UK who require reporting of processing activities;

We require all third parties to respect the security of Personal Data and to treat it in accordance with the Law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process it for the specified purposes and in accordance with our strict instructions.

We seek to ensure that all of our chosen third-party providers are GDPR compliant or equivalent.

Transferring Data outside of the EEA

We are based in the UK and do not transfer your personal data outside of the EEA except where this is necessary for the performance of our contract with you.

Where we do, we will make sure that suitable safeguards are in place, by agreeing expressed contractual arrangements, to ensure that the provider is GDPR compliant or equivalent.

Data Security

Our designated IT provider have put together appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.

Our strategy on data security includes physical access controls, restriction of access to and encryption of data stored on automatically updated systems, protected by hardware and software firewalls, antimalware solutions and multi-layered business continuity and disaster recovery strategies.

We only engage with GDPR-compliant providers of cloud systems such as Microsoft and data is only held on our UK and cloud providers' systems.

In addition, our internal controls mean that we limit access to your personal data to those employees, agents, contractors and other third parties on a “need to know” basis.

If they process your personal data as part of their role they do so under a duty of confidentiality and having been trained on our data protection standards which are in line with GDPR.

Wherever possible and practical, we use password protection and portals.

Data Breaches

We have put in place procedures to deal with any suspected or actual data breach and will notify you where we are required to do so.

Data Retention

We will only retain your Personal Data, and that which belongs to individuals connected with your investment, for as long as is necessary to fulfil our contract with you or for the purposes of satisfying a legal, accounting or regulatory requirement.

We assess retention on a case by case basis however; our minimum periods of retention for retaining personal data are;

- For the entire period that you are an investor or have a business relationship with us;
- For two years after you have ceased being an investor or having had a business relationship with us in which case all personal data will be deleted with the exception of basic information such as your name, investment made, main contact name and contact details and any relevant information which we feel may be of mutual benefit in the future;
- For 6 years plus, current year in the cases of financial information.
- In the case of marketing and communications; we will retain and process this indefinitely until such time that you opt out.

In some cases, we may anonymise your personal data so that it can no longer be associated with you, for research or statistical purposes and we may use this information indefinitely without further notice to you.

Your Legal Rights

You have the right to;

- Request **Access** to your personal data, commonly referred to as a data subject access request or DSAR which enables you to receive a copy of the personal data we hold on you and to check that it is being lawfully processed;
- Request **Correction** of your personal data which enables you to have any incomplete or inaccurate data corrected;
- Request **Erasure** of your personal data. This allows you to ask us to delete or remove personal data where there is no good reason for us to continue processing it. Please note that whilst we wish to comply with this as much as possible, it may be difficult to agree to this if we are required to continue processing for a legal reason(s); however we will notify you of this.

If you wish to exercise any of these rights, please contact us.