

ASHRIDGE CAPITAL INVESTMENTS LLP PRIVACY POLICY

This Privacy Policy explains how and why we collect and use personal information, and what we do to ensure it is kept private and secure.

This Policy sets out the following:

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4. Business contacts and professional advisers
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12. About Ashridge Capital Investments LLP (and how to contact us)

1. THIS IS THE PRIVACY POLICY FOR ASHRIDGE CAPITAL INVESTMENTS LLP

For the purposes of data protection law, we will be a controller of your personal information. (This means we make decisions about how and why your information is used and have a duty to ensure your rights are protected).

If you have any questions about our Privacy Policy, please contact us by writing to the Data Protection Manager, Ashridge Capital Investments LLP, Ashridge House, Golf Club Road, Little Gaddesden, Herts. HP4 1LY; or emailing ds@ashridgecapital.com; or telephoning 07595 874822.

2. WHAT INFORMATION WE COLLECT

In order to operate our business and provide our services, we need to use personal information about actual and prospective clients, business contacts, directors and shareholders of companies we invest in and details of individual professional advisers and intermediaries.

We collect information from individuals to provide services and to keep them informed about us. This may include personal information, such as your name and contact details provided when communicating with us or signing up to receive investment opportunities. If you instruct us to provide services, then we shall also process financial information in order to provide you with investment services.

How we use your information

We will only use your information with your consent, or because we need to in order to:

- enter into, or perform, a contract with you
- comply with a legal or regulatory duty
- for our own (or a third party's) lawful interests, provided your rights don't override these
- protect your vital interests

In any event, your information will only be used for the purpose(s) we collected it for (or else for a closely related purpose, such as record keeping). Further details on how we use information in relation to particular groups of people (investors, business/professional contacts, and directors/shareholders of investee companies) can be found in paragraphs 3, 4 and 5 below.

If we need to use personal data in order to enter into or perform a contract with you then, if you don't provide that data, we may not be able to contract with you or provide the services.

Sharing information

We will never sell or trade your personal information. We do share information with our suppliers, and this may include personal information in some cases, but they will only be allowed to use the information for a specific purpose and there will be a written agreement which makes sure your information is protected.

We will also share personal information with professional advisers, intermediaries or when we are required to do so by law or by a regulator or governmental authority (for example HM Revenue and Customs or the Financial Conduct Authority).

Sensitive information

In certain limited circumstances, we may collect or process sensitive personal information (such as information about someone's health). In the event that we do, we'll ensure that this information is kept private and secure. We will collect some sensitive data about company directors and officers as part of our due diligence process (please see section 5 below for further details).

3. INVESTORS

We collect information about individual investors in order to provide our services, administer accounts and make investments. This information will include:

- basic personal information and contact details
- security information (to enable us to identify individual account holders and prevent fraud)
- information about their investments made through Ashridge Capital
- financial data (such as bank account details and unique tax reference) which we require to process payments and invest money on our clients' behalf

4. BUSINESS CONTACTS, PROFESSIONAL ADVISERS AND INTERMEDIARIES

We often work with other businesses. These might be intermediaries, professional advisers or other businesses with whom we choose to partner in relation to events or initiatives. We collect information about individuals working with or for these businesses, including names and contact details, and information about someone's role in a business (such as their job title).

5. DIRECTORS AND SHAREHOLDERS OF INVESTEES

We research and investigate businesses before making an investment. This includes not just the business itself, but also its owners and directors. We look at information which is publicly available and obtain personal information from third party sources like the investee business's website, Companies House and the Internet. This information might include names, job titles and career history and other directorships or shareholdings.

Before recommending a business as an investment, we sometimes ask the directors and officers to provide personal details about themselves by filling in a director's questionnaire. This can include sensitive personal data (such as information about the health or medical conditions that might affect someone's ability to run the business). We process this information on the basis of the relevant individual's specific consent and he or she can refuse to provide these details or ask us to delete them at any time.

6. OUR WEBSITE AND COOKIES

We don't collect or process personal information about visitors to our website.

We may collect non-personal information about visitors to our website as this helps us optimise and improve the website. This information might include your internet protocol address, the browser being used to connect to our site, the device (e.g. its operating system) and the connection type (e.g. the Internet service provider used). However, none of this information will directly identify you.

Cookies

Our website may use "cookies" to enhance your experience. Web browsers place cookies on hard drives for record-keeping purposes and sometimes to track information (such as repeat visits). You can choose to set your web browser to refuse cookies, or to alert you when cookies are being sent. However, if you refuse to allow cookies, this may interfere with your ability to use the site.

You can opt-out of Google's use of cookies by visiting [Google's Ads Settings](#). Alternatively, you can opt out of Google and third-party cookies by visiting the [Network Advertising Initiative](#) opt-out page.

Hyperlinks to other sites

Our website may contain hyperlinks to third-party websites. We are not responsible for the content or functionality of any of those external websites. If an external website requests personal information from you (e.g. in connection with an order for goods or services), the information you provide will not be covered by this Policy. We suggest you read the privacy policy of any website before providing any personal information.

7. COMMUNICATIONS

We may contact you by email, telephone or post with information about investment opportunities that might interest you (see ‘Marketing’ below), updates or information about your investments, or to notify you of changes to our terms of business or this Policy.

Marketing

If you are an existing investor with Ashridge Capital, we’ll send you marketing communications about investment opportunities that may be of interest, unless you ask us not to.

Email and SMS marketing

We will only contact an individual personally with email marketing communications if that individual is an existing investor or if he or she has asked to receive marketing or enquired about a particular service.

We sometimes send emails to business customers, contacts, intermediaries and professional advisers without their prior consent, which we do in order to promote our services and build relationships. If we have contacted you it will be because we think these communications may be of interest or relevance to you on the basis of our previous dealings with you or a recommendation from a third party.

Our marketing emails will always tell recipients why they are receiving that email and give them the option to unsubscribe.

Our marketing communications are either sent directly by us.

Telephone and post

We do not record telephone conversations or video calls. We may record electronic communication and retain copies, as well as any transcripts and any written or electronic communication we have with you. These will be used for the purpose of administering your account, training, evidencing compliance with regulatory requirements, evidence in the event of a dispute, or as evidence in court.

Changing your preferences or unsubscribing

You can change how you hear from us or unsubscribe from marketing at any time. You can do this by clicking the “unsubscribe” link on any of our emails, or by writing to the Data Protection Manager, Ashridge Capital Investments LLP, Ashridge House, Golf Club Road, Little Gaddesden, Herts. HP4 1LY; or emailing ds@ashridgecapital.com with details of your request. You can also contact us using these details if you wish to complain about a marketing communication you have received in error.

8. STORING YOUR INFORMATION

We employ a variety of physical and technical measures to keep your personal data safe and to prevent unauthorised access to or use or disclosure of it. Electronic data and databases are stored on secure computer systems and we control who has access to them (using both physical and electronic means). Our staff receive data protection training and we have a set of detailed data protection procedures which personnel are required to follow when handling personal data.

We cannot absolutely guarantee the security of the internet or external networks or your own device. Accordingly, any online communications (e.g. information provided by email or through our website) are at your own risk.

Storage

We only store personal information for as long as it is required for the purpose(s) we collected it for (or for a related compatible purpose, such as keeping a record of a transaction). We regularly review what data we have and delete that which is no longer necessary. In certain situations, you have the right to request that your data be deleted (the right to be forgotten), please see paragraph 10 for further details.

If you believe that any information we are holding on you is incorrect or incomplete, please contact us using the details set out in clause 1.

9. INTERNATIONAL TRANSFERS

We normally only store personal information within the European Economic Area (EEA). If one of our subcontractors (such as a payment processor) needs to transfer it outside the EEA then we will take steps to make sure adequate levels of privacy protection, in line with UK data protection law, are in place. These safeguards will usually be contractual and/or the result of a European Union decision which allows the transfer (for example, a US organisation which is certified under the EU-US Privacy Shield framework).

10. YOUR RIGHTS

We want you to remain in control of your personal information. Part of this is making sure you understand your legal rights, which are as follows:

- where data is processed on the basis of consent, the right to withdraw that consent
- the right to confirmation as to whether or not we have your personal data and, if we do, to obtain a copy of the personal data
- the right to have inaccurate data rectified
- the right to object to your data being used for marketing or profiling, or on the basis of our or a third party's legitimate interest
- the right to restrict how your personal information is used
- the right to be forgotten, which allows you to have your data erased in certain circumstances (though this is not an absolute right and may not apply if we need to continue using the information for a lawful reason)

If you would like further information on your rights or wish to exercise them, please write to the Data Protection Manager, Ashridge Capital Investments LLP, Ashridge House, Golf Club Road, Little Gaddesden, Herts. HP4 1LY; or email ds@ashridgecapital.com with details of your request.

Please keep in mind that there are exceptions to the rights above and, though we will always try to respond to your satisfaction, there may be situations where we are unable to do so (for example, because the information no longer exists or there is an exception which applies to your request).

If you are not happy with our response, or you believe that your dataprotection@oxcp.com or privacy rights have been infringed, you should contact the UK Information Commissioner's Office, which oversees data protection compliance in the UK. Details of how to do this can be found at www.ico.org.uk.

11. UPDATES TO THIS POLICY

We may update this Policy at any time. When we do, we will post a notification on the main page of our website, revise the updated date at the bottom of this page. We encourage users to frequently check this page for any changes to stay informed about how we are helping to protect the personal information we collect.

This policy was last updated on 27th April 2018.