



General Information

Confluence Investors is committed to respecting and protecting your privacy. Confluence Investors takes care to use your information only for legitimate and specific business purposes. Our data protection framework is based on the following:

- We respect the privacy rights of our employees, customers, investors and other contacts whose personal data we have and use;
- We obtain personal data fairly and transparently and only use it for legitimate purposes;
- We have implemented appropriate technical and organisational measures to protect personal data;
- We hold ourselves accountable for complying with the data protection requirements where we operate.

This Privacy Notice details Confluence Investors data privacy principles and how it collects and processes personal data, as well as explaining your rights and obligations. Processing includes all actions that can be performed on personal data, such as collection, recording, organisation, structuring, storage, adaptation/alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Confluence Investors are the 'controller' of the personal data you provide. Please read the following information carefully in order to understand Confluence Investors practices in relation to the treatment of your personal data. Should you have any questions, please email Confluence Investors at [\[dataprivacy@capitalworksip.com\]](mailto:dataprivacy@capitalworksip.com).

To what data privacy principles does Confluence Investors adhere?

- Confluence Investors will process all personal data in a lawfully, fair and transparent manner;
- Confluence Investors will only collect personal data, where necessary, for:
 - Confluence Investors to provide a service to you;
 - You to provide a service to Confluence Investors;
 - Confluence Investors to keep you informed of its products and services; and/or
 - Confluence Investors to comply with its legal and regulatory obligations.
- The personal data collected by Confluence Investors will be adequate, relevant and limited to what is necessary in relation to the specific purpose for which your data will be processed;
- Confluence Investors will take all reasonable steps to ensure that personal data is accurate and, where necessary, kept up to date;
- Confluence Investors will maintain personal data no longer than is necessary for the purposes for which the personal data has been collected;
- Confluence Investors will hold and process personal data in a manner that ensures appropriate security;
- Confluence Investors will only share personal data where it is necessary to provide the agreed service or where it is necessary for Confluence Investors to comply with its legal and regulatory requirements; and



- Confluence Investors will only utilise a third-party service provider for the processing of personal data where this is strictly necessary to facilitate our services to you or your service to Confluence Investors. In all cases, we will ensure service providers demonstrate compliance or certification to the relevant information security standards ahead of transferring any personal data.

What personal data does Confluence Investors collect and why?

In the course of providing products/services to you or vice versa, Confluence Investors may collect information that is considered personal data (e.g. name, contact details, address, etc.) We may also collect personal data when you enquire about our business (e.g. using the contact form on our website), correspond with Confluence Investors, speak to or meet with Confluence Investors representatives or employees, or otherwise interact with Confluence Investors.

Once you become a client, vendor or employee of Confluence Investors, we will require some personal information in order to verify your identity and have the applicable relationship with you. Some of this data may be required to satisfy legal obligations (e.g. to comply with obligations arising under money laundering regulations), whereas other data may be required in connection with the provision of services to or from you. The data collected will vary depending on the service Confluence Investors provides to you or you provide to Confluence Investors, but typically includes:

	Personal Information	Contact Information
Employees	<ul style="list-style-type: none"> • Name • Date of birth • ID/passport number • Tax or national insurance number • Banking details • Qualifications • Other relevant KYC data 	<ul style="list-style-type: none"> • Home address • Telephone number • Email address
Customers/ Clients/ Vendors	<ul style="list-style-type: none"> • Name • Position • Company • Banking details • Relevant KYC documentation 	<ul style="list-style-type: none"> • Company address • Telephone number • Email address

In the case of employees, it may be necessary for Confluence Investors to collect special personal information or children’s data (e.g. for the purposes of family medical cover). This data will only be collected and processed if the conditions within the relevant data protection legislation can be satisfied and there is a specific purpose/legitimate interest to collect the data.

Confluence Investors shall always obtain any required data directly from you, unless it is required by law to obtain the data from another source.

Where does Confluence Investors store personal data and how is it secured?



Most personal data collected by Confluence Investors is stored electronically. Confluence Investors has comprehensive technical and organisational procedures in place to ensure your personal data is kept safe and secure, with these including:

- Data encryption;
- Firewalls;
- Virus prevention and threat and intrusion detection;
- E-mail filters;
- Multi-factor authentication;
- 24/7 physical protection of facilities where your data is stored (i.e. company offices or Microsoft's data centres);
- Controlled access to any physical onsite data storage facilities; and
- Security procedures across all service operations.

Where personal data is stored in hard copy, it is retained in secure environments where access is restricted based on the 'need to know' principle.

How long does Confluence Investors retain personal data?

Confluence Investors is required to maintain its books and records for a prescribed period (typically five years from either the ceasing of a business relationship or, in the case of non-clients, from the making of a record – or alternatively, for seven years, where specifically requested to do so by the relevant regulatory authority). As such, information that falls in scope of either of these requirements is retained in line with the mandated timeframe.

Any information that is outside the scope of this requirement will be retained while relevant and useful and destroyed where this ceases to be the case or where the individual or company specifically requests this.

What is Confluence Investors policy on cross border transfers?

Confluence Investors will only transfer personal data to third countries, if:

- The recipient is subject to a law or binding corporate agreement which provides an adequate level of protection that effectively upholds principles for reasonable processing of the data that are substantially similar to the conditions for lawful processing under UK GDPR;
- The individual consents to the transfer;
- The transfer is necessary for the performance of a contract between the individual and Confluence Investors or for the implementation of pre-contractual measures taken in response to the individual's request;
- The transfer is necessary for the conclusion or performance of a contract concluded in the interest of the individual between Confluence Investors and a third party;
- The transfer is for the benefit of the individual, and it is not reasonably practicable to obtain the consent of the individual, but if it were, the individual would be likely to give it; or
- The transfer is necessary to establish, make or defend a legal claim or for important reasons of public interest.



What legal basis does Confluence Investors rely on to process personal data?

We set out below the legal bases that we rely upon in order to process the personal data that we collect from you.

- **Consent:** where you have consented to our use of your information.
- **Contract performance:** where your information is necessary to enter into or perform our contract with you (or to take steps necessary or at your request before entering into such a contract).
- **Legal obligation:** where we need to use your information to comply with our legal and regulatory obligations.
- **Legitimate interests:** where we use your information to achieve a legitimate interest and our reasons for using it outweigh any prejudice to your data protection rights.
- **Legal claims:** where your information is necessary for Confluence Investors to defend, prosecute or make a claim against you, Confluence Investors or a third party.

Typically, and when reasonably practicable, Confluence Investors will reach out to you personally to confirm which legal basis is being relied upon to process your personal data; however, as a general rule the following is applicable:

- **Clients** – Information is processed on the basis of *contractual performance* legal obligations, legal claims and/or *legitimate interests* (where relevant);
- **Employees** – Information is processed on the basis of *contractual performance*, *legal obligation* and *legitimate interests* (for example, ensuring we recruit the appropriate employee);
- **Service providers** – Information is processed on the basis of *contractual performance*, legal obligations and legal claims; and
- **Database/marketing contacts** – Information is processed on the basis of *legitimate interest*.

What are your rights?

Once you have provided your details to Confluence Investors, you have certain rights that apply, depending on your relationship with Confluence Investors, the information you have shared with Confluence Investors and Confluence Investors legal and regulatory obligations.

- You have the right to request a copy of the information that we hold about you. If you would like a copy of some or all of your personal information, please email Confluence Investors at dataprivacy@capitalworksip.com. Confluence Investors will provide information for straightforward requests to you within one month at no cost to you. If the request is complex or excessive in nature, Confluence Investors will be able to extend the deadline by an additional two months and will inform you of the reason within a month. In this case, charges may apply.
- You have the right to request that the information Confluence Investors holds about you is erased under certain circumstances, including where there is no additional legal and/or regulatory requirement for Confluence Investors to retain this information.



- As a client, you have the right to request that any information Confluence Investors holds about you be provided to another company in a commonly used and machine-readable format, otherwise known as 'data portability'.
- You have the right to ensure that your personal information is accurate and up to date, or where necessary rectified. Where you feel that your personal data is incorrect or inaccurate and should therefore be updated, please contact dataprivacy@capitalworksip.com.
- You have the right to object to your information being processed, e.g. for direct marketing purposes.
- You have the right to restrict the processing of your information, e.g. limiting the material that you receive or to where your information is transferred.
- You have the right to object to any decisions based on the automated processing of your personal data, including profiling.
- You have the right to lodge a complaint with the local Information/Data Regulator if you are not happy with the way we manage or process personal data.

What is Confluence Investors' policy on cookie usage?

Cookies are small pieces of data, stored in text files on your device when websites are loaded into your browser. Confluence Investors website only uses cookies that are strictly necessary. The cookies we use are essential for the website to perform its basic functions. None of our cookies perform any user tracking, analytics or advertising, and Confluence Investors does not collect or process any personal data through its use of cookies on its website. Personal data is only collected if the Confluence Investors contact email address provided on the website is used.

Will I be notified of changes to this policy?

Confluence Investors may, from time to time, review and update this policy. Confluence Investors will maintain the latest version of this policy on its website.

Who should I direct questions to?

If you have any questions, concerns or complaints about the practices contained within this document or how Confluence Investors handles your data, please email: dataprivacy@capitalworksip.com.