PROFOUNDERS CAPITAL PARTNERS LLP PRIVACY POLICY

Who are we?

We are:
PROfounders Capital Partners LLP. Our contact details are as follows:
Mail: 3 Cadogan Gate, London, SW1X 0AS.
Email: rogan@profounderscapital.com
Telephone: +44 (0)20 7766 6900

The protection of your privacy is important to us. We want to provide a safe and secure service where we deal with your personal information. This means information that identifies you personally such as your name, contact details, “know your client” information or data that can be linked with such information in order to identify you.

This Privacy Policy describes the types of personal information we collect from our suppliers, clients, professional and business contacts, potential investors in new PROfounders Capital funds, companies seeking funding and from visitors and users of www.profounderscapital.com and other websites or applications that may link to this privacy policy (together, the “Websites”), how we use the information, with whom we may share it and the choices available to you regarding our use of the information.

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What personal information do we collect about you?

We collect and process your information in the following ways:

**Information you give us**

In the course of a business relationship with you (or where such a relationship is possible), we may collect the following types of information:

- personal and business contact information (such as name, email, and telephone number);
- “know your client” information (such as copy passports, driving licences, utility bills, date and place of birth, National Insurance number and details of investments and offices held);
- billing and payment information.

The types of information we collect on the Websites includes:

- personal and business contact information (such as name and email address); and
- other personal information you submit to us via the Websites.

If you are a potential investor in a new PROfounders Capital fund, we may ask you to provide personal information, including:

- personal and business contact information (such as name, email, and telephone number);
- details of your agents;
- information on the amount you wish to invest; and
- information on your financial status required for client categorisation purposes.

For potential investors which are legal entities, the personal information we collect will relate to the contact persons of such entities.

When we receive a business plan or deck from a company seeking funding, we may collect:

- personal and business contact information (such as name, email, and telephone number);
- employment information (such as previous roles, salaries and equity holdings);
- similar for your partners and employees; and
- additional due diligence information in the course of further investigation

**Information we collect automatically**

We do not collect cookies on our website. Please see our Cookie Policy at profounderscapital.com for more details.

When you open our emails, we may collect certain information by automated means, such as web server logs, web beacons and JavaScript. The information we may collect in this manner includes IP address, network location, time of opening, device characteristics, operating system.

If you are a potential investor in a new PROfounders Capital fund, we will record details of our interactions with you, including your data room usage (or that of your agents) and records of our meetings and telephone calls with you. For potential investors which are legal entities, the same personal information will be collected in relation to the contact persons of such entities.

Telephone conversations held with our employees may be automatically recorded in accordance with our regulatory obligations.
How do we use your personal information?

We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances:

(a) To provide a requested service or to perform a contract we have entered into with you.

(b) Where we need to comply with a legal obligation.

(c) Where it is necessary for our legitimate interests (or those of a third party) (in particular communicating with you, improving our business and services to you, improving our Websites and preventing fraud or misuse of our Websites) and your interests and fundamental rights do not override those interests.

(d) Where we have your consent.

More specifically, we may use the personal information described above for the following purposes:

- where agreed by you, to send you promotional materials, newsletters and other communications and in certain circumstances where we have a legitimate interest in sending you such material by virtue of our business relationship with you and you have not objected to this;
- to respond to your enquiries in our legitimate interest;
- to perform data analyses in our legitimate interest;
- to communicate to you about, and manage your participation in, events and programmes in our legitimate interest;
- to operate, evaluate and improve our business in our legitimate interest;
- to communicate with you in our legitimate interest regarding a potential investment in a new PROfounders Capital fund and to assess whether you (or the legal entity you represent) are a suitable investor in the fund;
- to help to evaluate a business plan for potential investment by a PROfounders Capital fund
- to identify and prevent fraud and other illegal activities in our legitimate interest and in some circumstances where we have a legal obligation to do so; and
- to enforce and comply with legal rights and obligations, including our terms and conditions

We may also use the information described above in other ways for which we provide specific notice at the time of collection.

Where we rely on our legitimate interest as a ground for processing your personal information, we carry out a ‘balancing test’ to ensure that our processing is necessary and that your fundamental rights of privacy are not outweighed by our legitimate interests, before we go ahead with such processing. We keep a record of these balancing tests. You have a right to the information contained in these balancing tests on request and can find out more by contacting us using the details below.
**How long do we keep your personal information for?**

We only retain your information for as long as is necessary for us to use your information as described above, where it is in our legitimate interest, or to comply with our legal obligations. Please be advised that we may retain some of your information after we cease our relationship with you, for instance if this is necessary to meet our legal obligations, such as retaining the information for tax and accounting purposes or to comply with financial services regulations.

When determining the relevant retention periods, we will take into account factors including:

(a) our contractual obligations and rights in relation to the information involved;
(b) legal obligation(s) under applicable law to retain data for a certain period of time;
(c) our legitimate interest;
(d) statute of limitations under applicable law(s);
(e) (potential) disputes;
(f) if you have made a request to have your information deleted; and
(g) guidelines issued by relevant data protection authorities.

Otherwise, we securely erase your information once this is no longer needed.

**Who do we share your personal information with?**

**Business processes**

In connection with our day to day business processes, we share your personal information with third parties who perform functions on our behalf and who also provide services to us, such as professional advisors, IT consultants carrying out testing and development work on our business technology systems and function co-ordinators. These third parties comply with similar and equally stringent undertakings of privacy and confidentiality.

**Establishing a fund**

Personal information relating to potential investors in new PROfounders Capital funds (and their representatives) will be shared with third parties who provide services to us in connection with the establishment of the fund, such as administrators, professional advisors and placing agents. These third parties comply with similar and equally stringent undertakings of privacy and confidentiality.

**Sharing with group members, affiliates and investors**

We may share your personal information amongst our group members, affiliates and investors in connection with the provision of services to you, for fund management purposes or for internal reasons, such as for business and operational purposes. Our group members, affiliates and investors will only use your personal information for the purposes described in this privacy policy.

**Other instances of sharing**
As we continue to develop our business, we may sell or purchase assets. If another entity acquires us or any of our assets or merges with us, your personal information will be disclosed to such entity.

Where required we share your personal information with third parties to comply with a legal obligation; when we believe in good faith that an applicable law requires it; at the request of governmental authorities conducting an investigation; to verify or enforce contracts or applicable policies; to detect and protect against fraud, or any technical or security vulnerabilities; to respond to an emergency; or otherwise to protect the rights, property, safety, or security of third parties, visitors to our websites, our businesses or the public.

What happens if you do not provide us with the information we request or ask that we stop processing your information?

If you do not provide the personal information necessary or withdraw your consent for the processing of your personal information, where this information is necessary for us to provide services to you, we will not be able to provide these services to you.

Do we make automated decisions concerning you?

No, we do not carry out automated decision making.

Do we use Cookies to collect personal data on you?

We do not use cookies on our website. For more see our cookie policy at profounderscapital.com.

Do we transfer your personal information outside the EEA?

Occasionally, we may transfer your personal information out of the European Economic Area (EEA). The existing PROfounders Capital funds are established outside of the EEA and we share investor information, personal information of potential target investments and certain business and professional information with our funds. We have implemented safeguards to ensure that investors’ personal information is, when transferred outside of the EEA, afforded a similar degree of protection as applies in the EEA.

What are your rights?

By law, you have a number of rights when it comes to your personal information. Please contact us using the contact details below to exercise any of your rights. Please note that these rights are not without restriction and may not apply in all circumstances. Further information and advice about your rights can be obtained from the data protection regulator in your country.
<table>
<thead>
<tr>
<th>Rights</th>
<th>What does this mean?</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. The right to object to processing</td>
<td>You have the right to object to certain types of processing, including processing for direct marketing (i.e. if you no longer want to be contacted with potential opportunities).</td>
</tr>
<tr>
<td>2. The right to be informed</td>
<td>You have the right to be provided with clear, transparent and easily understandable information about how we use your information and your rights. This is why we're providing you with the information in this Policy.</td>
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<tr>
<td>3. The right of access</td>
<td>You have the right to obtain access to your information (if we’re processing it), and certain other information (similar to that provided in this Privacy Policy). This is so you’re aware and can check that we’re using your information in accordance with data protection law.</td>
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<td>4. The right to rectification</td>
<td>You are entitled to have your information corrected if it’s inaccurate or incomplete.</td>
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<td>5. The right to erasure</td>
<td>This is also known as ‘the right to be forgotten’ and, in simple terms, enables you to request the deletion or removal of your information where there's no compelling reason for us to keep using it. This is not a general right to erasure; there are exceptions.</td>
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<tr>
<td>6. The right to restrict processing</td>
<td>You have rights to ‘block’ or suppress further use of your information. When processing is restricted, we can still store your information, but may not use it further. We keep lists of people who have asked for further use of their information to be ‘blocked’ to make sure the restriction is respected in future.</td>
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<tr>
<td>7. The right to data portability</td>
<td>You have rights to obtain and reuse your personal information for your own purposes across different services. For example, if you decide to switch to a new provider, this enables you to move, copy or transfer your information easily between our IT systems and theirs safely and securely, without affecting its usability.</td>
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<tr>
<td>8. The right to lodge a complaint</td>
<td>You have the right to lodge a complaint about the way we handle or process your personal information with your national data protection regulator.</td>
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<td>9. The right to withdraw consent</td>
<td>If you have given your consent to anything we do with your personal information, you have the right to withdraw your consent at any time (although if you do so, it does not mean</td>
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that anything we have done with your personal information with your consent up to that point is unlawful). This includes your right to withdraw consent to us using your personal information for marketing purposes.

We usually act on requests and provide information free of charge, but may charge a reasonable fee to cover our administrative costs of providing the information for:

- baseless or excessive/repeated requests, or
- further copies of the same information.

Alternatively, we may be entitled to refuse to act on the request.

Please consider your request responsibly before submitting it. We’ll respond as soon as we can. Generally, this will be within one month from when we receive your request but, if the request is going to take longer to deal with, we’ll come back to you and let you know.

**How will we contact you?**

We may contact you by phone, post, email or social media. If you prefer a particular contact means over another please just let us know.

**How can you contact us?**

If you have any enquires you can contact us at: [rogan@profounderscapital.com](mailto:rogan@profounderscapital.com), or by writing to us at:

Rogan Angelini-Hurl
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3 Cadogan Gate
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