

PARK VALE CAPITAL LIMITED - PRIVACY POLICY

Park Vale Capital Limited (“**Park Vale**” or “**we**”) is an investment manager dedicated to managing assets on behalf of institutions, foundations and family office clients. It is authorised and regulated by the Financial Conduct Authority in the UK (FRN: 588604) with registered office at Unit 6 Albion Riverside Building, 8 Hester Road SW11 4AX London.

Park Vale is a Data Controller under the General Data Protection Regulation (EU) 2016/679 (“**GDPR**”). This Privacy Policy describes how we use your personal information and for which purpose. There may be times when we use your information for reasons not set out herein, in which case we will clearly explain the reason(s) for doing so at the time of collecting the data.

The collection and use of your personal information will depend on the particular relationship and arrangements in place between Park Vale and yourself. We would only use and share information where it is necessary for Park Vale to meet its legitimate interests as described below.

I. Security

The protection of personal data is a fundamental right. Access to this information held by Park Vale is limited and we have systems and procedures in place to protect this information and keep it confidential. We monitor and revise the appropriateness of these security measures on a regular basis.

We process personal data in relation to:

- Staff,
- Consultants and Service Providers,
- Business Contacts,
- Corporate Clients

and the individuals associated with these entities.

II. What type of personal data is collected and processed by Park Vale, and on what basis?

We limit the collection of personal data to information which we can process pursuant to a lawful basis, namely a contractual necessity, a legal obligation or to meet Park Vale’s legitimate interests. Depending on the nature of Park Vale’s relationship with you and the purpose for collecting the information in accordance with the data policy below, personal data may include:

- Name,
- Date of birth,
- Contact details (work/personal email address, mobile or telephone numbers)
- Work/home address,
- Financial information such as bank account information,
- Source of wealth,
- Whether the individual is a politically exposed person or not,
- Education and employment information,
- Photographic representations (through passport copies and other types of identification paperwork).

Unless required to do so under specific regulation or for a particular purpose not already described in this Privacy Policy, we do not collect or process special categories of personal data, which would include information on racial or ethnic origin, political opinion, religion or beliefs, trade union membership, genetic or health status or sexual orientation or biometric.

a. Staff

We collect personal information on our employees, interns, prospective employees and other staff for the purpose of administering payroll, meeting Park Vale’s regulatory requirements and/or managing the business. For further information, members of staff should refer to Park Vale’s Compliance Manual.

b. Consultants and Service Providers

Park Vale enters into contracts to receive or provide professional services from/ to various consultants and third-party entities. At the start and throughout the duration of the contractual arrangement, we collect personal information on the directors, persons with significant control, signatories and other officers and beneficial owners of the relevant business and any of its associated companies, as applicable and in accordance with the laws and regulations. We collect and process this information to meet Park Vale's business and contractual obligations under the various contracts.

Park Vale is also subject to legal and regulatory requirements. For example, we need to carry out anti-money laundering checks on a company's executives prior to initiating a business relationship with a new corporation. In accordance with the law and rules of the Financial Conduct Authority (the UK regulator), we must keep a record of these checks on file. The personal data mentioned above forms part of these records.

Overall, personal data belonging to Consultants and/or individuals associated with Services Providers is used to:

- meet contractual obligations and other arrangements,
- operate, evaluate and improve Park Vale's business,
- carry out auditing, accounting and other internal functions,
- meet due diligence requirements and exercise fraud prevention,
- monitor compliance with applicable laws and regulations,
- maintain Park Vale's security procedures, and
- comply with applicable laws and regulations.

c. Business Contacts

Park Vale maintains records of the names, work emails, telephone numbers of its contacts within the relevant industries. We only collect this information directly from the individuals concerned who willingly provide their details to us during conferences, networking events, private meetings and/or through our existing relationships.

We process this information:

- for the purpose of direct marketing by way of monthly or quarterly updates in relation to Park Vale's sector activities or regarding the funds under its management,
- to set up meetings and assess potential interest in relation to a particular business arrangement under consideration,
- to operate, evaluate and improve Park Vale's business,
- to carry out auditing, accounting and other internal functions,
- to prevent fraud,
- to monitor compliance with applicable laws and regulations,
- to carry out security maintenance over Park Vale's systems, and
- to comply with applicable laws and regulations.

Whilst processing this information does not override your rights, we have a legitimate interest in using it as it could potentially assist Park Vale to further develop its business, raise interest from professional investors, increase its assets under management and keep existing investors and other interested parties apprised of new developments.

Direct marketing procedures are limited to period updates sent to a very and limited distribution list of Business Contacts. Recipients of these emails are given the opportunity to opt-out from the distribution list so that their information is not used for such a purpose. The use of personal data for regular updates is targeted and proportionate in accordance with the guidelines issued by the Information Commissioner's Office regarding the GDPR provision of "*legitimate interest*".

d. Corporate Clients

Park Vale has Professional Clients and does not deal with Retail Clients (terms defined in the rules of the Financial Conduct Authority). Most of its Professional Clients are corporate entities. We therefore collect and process personal data on the individuals associated with Park Vale's corporate clients.

Due to the regulatory requirements, we ask to see certified copies of passport and other identification documents. Personal data collected for this purpose includes date of birth, place of birth, passport number and home address. Data collection also includes contact details (telephone/mobile numbers, email addresses, office address).

The processing of this information is to:

- meet contractual obligations and other arrangements,
- direct marketing,
- operate, evaluate and improve Park Vale's business,
- carry out auditing, accounting and other internal functions,
- meet due diligence requirements and exercise fraud prevention,
- monitor compliance with applicable laws and regulations,
- maintain our security procedures, and
- comply with applicable laws and regulations.

Any information used for direct marketing purposes is conducted to meet Park Vale's legitimate interest. It allows Park Vale to keep existing clients and other contacts informed of market or investment updates, either monthly or quarterly. Clients may also get contacted with new opportunities that may be of interest to them. Direct marketing is usually conducted via email and in accordance with Park Vale's legitimate interest in a proportionate and targeted manner.

e. Visitors to Park Vale's Website

Park Vale uses cookies on its website, which records IP addresses, date, time, page visited and the duration of the visit on the site. This type of data is limited and only used for system administration and statistical purposes to evaluate and manage the use of our website.

Overall, we may collect and use personal information in other ways than the ones described above. However, we will provide specific notice at the time of collecting the relevant data and request express consent, if applicable. If we decide to change the purpose for which your data is processed and we do not believe that you would expect the use of your information for such a purpose, we would contact you in advance to notify you of the change.

III. How does Park Vale obtain Personal Data?

We collect personal data in a number of ways:

- information provided directly from the individual,
- information received from third-party suppliers in relation to services, including but not limited to fraud prevention or employment or other background checks,
- data collected automatically from Park Vale's systems when someone visits our website,
- from publicly available sources, such as company websites, press and online engines.

IV. Transferring Information Overseas

Personal data stored locally is held at Park Vale's registered office. Electronically-stored information may be transferred overseas as some of our third-party providers are based outside of the European Economic Area (which includes countries in the European Union, as well as Iceland, Liechtenstein and Norway). When such transfers take place, we ensure to transfer the information to:

- a country or organisation which has been categorised as adequate by the European Commission and/or meets the same standards of data protection as the UK, or
- an organisation pursuant to a contract between Park Vale and the third-party on terms that contain data privacy provisions approved by the European Commission.

V. Sharing Information with Third Parties

We only share personal data with third parties pursuant to the legitimate interests described above. However, we may be required to share information with other entities by law, in connection with any legal proceedings or in response to an enforcement action or investigation carried out by an authority or regulator. We do not transfer such information to

third parties for their own marketing purposes without requesting your express consent. We do not sell or buy personal data from other providers.

VI. How long will the information be stored?

We retain your personal data for as long as it is considered necessary for the purpose for which it was collected, subject to the applicable laws and regulations. As an entity authorised and regulated by the Financial Conduct Authority, Park Vale is subject to record-keeping requirements. The retention period is determined on the type of information, the nature of the activity and the rules and regulations applicable at the time. In general, we have policies and procedures in place to keep records for up to seven years.

We may have to retain personal data for longer periods, especially were Park Vale has been ordered to withhold destruction of the information by the Courts, the regulator or other enforcement agency as evidence.

VII. What are your rights?

Should you wish to contact us in relation to any of your rights under the GDPR, you can either write to Park Vale's registered office address as Unit 6 Albion Riverside Building, 8 Hester Road SW11 4AX London, UK.

Irrespective of the nature of your GDPR request, we will respond to you within 30 days of receipt of your initial notification to confirm whether we can take any action. If we believe that we have good grounds not to meet your request, we will notify you and explain the reasons for not doing so.

a. The right to access your data

If you would like to receive a copy of the personal information that we hold on you, you can contact us as per the above instructions. We may need to verify your identity before we can take any further steps in response to your request.

b. The right to rectify your data

If you believe that Park Vale holds inaccurate information on you, you can request us to rectify and update it. We may have to withhold the processing of your personal data until the new information has been verified and updated on Park Vale's systems.

c. The right to erase your data

If you believe that Park Vale is processing your data unlawfully, at a time when it no longer needs to or for the purpose for which it was provided, you can request for your personal data to be erased. However, this request is not absolute under the GDPR and depending on the circumstances, Park Vale may not be able to meet your request.

d. The right to restrict the processing of your data

You may wish to ask Park Vale to limit the processing of your data if you believe that the information is being unlawfully processed and/or we no longer need it for a particular purpose. This request is not absolute under the GDPR and Park Vale's ability to meet it will depend on the circumstances.

e. The right to data portability

You have the right to receive a copy of the personal data that Park Vale holds on you, and/or ask us to transfer your personal data to someone else. Either way, we will seek to provide you with the information on a portable format which is safe and machine-readable.

f. The right to object to the processing of your data and/or direct marketing

You have the right to object to the processing of your personal data by Park Vale. However, please note that this right is not absolute under the GDPR. Park Vale is authorised and regulated by the Financial Conduct Authority and subject to the general law. It is therefore subject to certain record-keeping requirements. Applicable laws and regulations may restrict our ability to meet any request to stop processing your information. However, you retain an absolute right to ask us to stop processing your information for direct marketing purposes. Should you wish to notify us of such a request, please contact us using the details set out above. In the event that we rely on your permission to use your information for a particular purpose, you retain the right to withdraw your consent at any time.

g. The right to withdraw your consent

As set out in this Privacy Policy and depending on the nature of our relationship with you, Park Vale relies on its legitimate interests in order to process personal information. We do not rely on express consents as a lawful basis for processing your information. We may therefore not be in a position to meet a request to stop processing it. However, should you wish to withdraw your permission in relation to our periodic market or investment updates, please email us your request and we will stop using your data for the purpose of direct marketing.

h. The right to lodge a complaint with the regulator

Should you wish to complain about the way we use your personal data or handled your request pursuant to your rights under the GDPR, please contact our Data Compliance Officer in the first instance. He will investigate the matter and aim to address your concerns within 30 days of receipt of your complaint. You can also lodge a complaint with the Information Commissioner's Office (ICO). For more information, please visit ico.org.uk.

Contact Information

If you have any questions in relation to this Privacy Policy or how Park Vale processes personal data, please contact our Data Compliance Officer at:

Park Vale Capital Limited
Unit 6 Albion Riverside Building
8 Hester Road
SW11 4AX
London

T: +44 (0) 207 350 4555