

Portfolio Manager Due Diligence Privacy Notice

Why are you receiving this notice?

The General Data Protection Regulation (“**GDPR**”) (implemented across all European Union member states from 25th May 2018) applies to the collection, processing and storage of personal data (including special (sensitive) category data) undertaken by organisations within the European Economic Area (EEA), as well as to firms outside the EEA that handle personal data relating to individuals in the EEA.

The GDPR has two key purposes: (a) to set guidelines for the collection, processing and protection of personal data and (b) to give individuals certain rights in relation to their personal data (such as to access and correct it and object to further processing).

This Privacy Notice for Kairos Investment Management Limited (we, us, our) applies in respect of the due diligence which we undertake including in respect of you in connection with our proposed or existing investment, or that of any of our affiliates or clients, in your business or that of your employer or that of any of your or their affiliates or any fund or other product which you or your employer or any of your or their affiliates may manage or advise (a “**Related Product**”) and is intended to ensure that you (where you are an individual) and, where you are not an individual, your individual directors, officers, members, employees and/or owners (“**you**”, or “**your**”) are aware of the categories of your personal data we may collect, how we collect it, what we use it for and with whom we share it in accordance with the GDPR. Where you are not an individual please provide a copy of this Privacy Notice to those individual directors, officers, employees and/or owners whose personal data we process.

By **personal data** we mean any information relating to you such as your name, contact details or past experience and qualifications. Personal data does not include data which has been anonymised, such as data from equal opportunities monitoring carried out on an anonymised basis.

We are a **data controller**. This means that we are responsible for deciding how we hold and use personal data about you. Should you have any questions about this Privacy Notice you can contact us at gdprmmuk@kairospartners.com.

This Privacy Notice applies to personal data about you that we collect, use and otherwise process in connection with our proposed investment. It applies to all of our directors, members (where appropriate) and staff. **Staff**, for this purpose, includes all employees, officers, consultants, contractors, agency workers, homeworkers, interns, casual workers, volunteers and anyone else working on our behalf.

What information do we collect about you and what do we use it for?

The types of personal data about you which we may collect, store and use are set out in the table below and in each case we have specified the purpose and our ‘lawful basis’ for processing it.

Category of personal data	Examples	Purpose	Lawful basis for processing
Background checking information	CV, academic records, past career history, background checks including financial crime screening system e.g. Thomson Reuters World-Check	To verify details provided during our due diligence process	Our legitimate interests in conducting appropriate due diligence in respect of our proposed or existing investment, or that of any of our affiliates or clients, in your business or that of your employer or that of any Related Product
Business contact details	Name, job title, department, email addresses & telephone numbers	Necessary for conducting business	
Performance information	Targets, objectives, past performance and compensation history	To verify details provided during our due diligence process	
Compliance records	Compliance reporting and annual certifications	To verify details provided during our due diligence process	

Special categories of personal data

There are more limited bases for processing special category personal data. This is personal data which reveals or contains racial or ethnic origin, political opinions, religious and philosophical beliefs, trade union membership, genetic data, biometric data, health data, sex life and sexual orientation.

We do not intend to actively collect special category data about you. Whilst we will use reasonable efforts to limit our holding of such data, please be aware that we may hold such data incidentally. For example, where:

- you volunteer special category data to us or one of our processors, such as if you send us an email containing special category data;
- documents gathered for legal / regulatory purposes contain special category data, such as a due diligence search from public sources which includes special category data.

What if you do not provide the personal data we request?

If you do not provide us with certain information when requested, we may be unable to proceed with or continue our proposed investment and /or contract.

Change of purpose

We will only use your personal data for the purposes for which we collected it (as identified in the *Purpose* column of the tables set out above), unless we reasonably consider that we need to use it for another reason which is compatible with the original purpose. If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

In some circumstances we may anonymise your personal data so that it can no longer be associated with you, in which case it is no longer personal data.

How do we collect this information?

We typically collect personal data about you:

- during the due diligence process;
- during the course of our investment; and
- in ad hoc or other periodic monitoring thereafter.

In addition, we may receive personal information about you from third parties, such as background check agencies.

With whom will we share your information?

We may share your personal data with a third party where this is required by law, where it is necessary to perform our contract, or where we have another legitimate interest in doing so.

We will/may need to share your personal data with:

- our service providers;
- professional advisers including lawyers, bankers, auditors and insurers to the extent such information is relevant to their performance of their services;
- any relevant regulatory body.

We may share your personal data with third parties, for example in the context of the possible sale or restructuring of the business. We may also need to share your personal data to comply with applicable law or judicial process or if we reasonably believe that disclosure is necessary to protect our rights and/or to comply with judicial or regulatory proceedings, a court order or other legal process.

We will share your personal data with other entities in our group as part of our regular reporting activities connected with our performance, in the context of a business reorganisation or group restructuring exercise, for system maintenance support and for hosting of data.

We may transfer the personal data we collect about you to non-EEA countries (including in particular Switzerland). Those countries may not have the same standard of data protection laws as the EEA.

Where this is the case, unless an exemption applies, we will seek to put in place appropriate safeguards where possible, such as the EEA-approved standard contractual clauses to ensure that your personal data is treated in a manner that is consistent with and respects the EEA laws on data protection. If you require further information about this you can request it from the contact below.

How long will we retain your information?

We will only retain your personal information for as long as is necessary to fulfil the purposes for which it was collected, including for the purposes of satisfying any legal, regulatory, accounting or reporting requirements.

We will retain the majority of the categories of personal data set out above for the duration of our related investment or contract and may retain such personal data for up to 15 years after its termination, or such longer period as is required legal or regulatory reasons or in order to comply with our internal policies and procedures.

More detailed information is set out in our Data Retention Policy which is available on request.

Once we no longer require your personal data and any applicable retention period mandated by law or regulation has expired, we will destroy your personal data in accordance with applicable laws and regulations and in accordance with our Data Retention Policy.

Accuracy of information

It is important that the personal data we hold about you is accurate and current. Please let us know if your personal data changes and check and update your personal data when requested to do so.

Your rights in relation to your information

You have rights as an individual which you can exercise in relation to the information we hold about you under certain circumstances. These rights are to:

- request **access** to your personal data (commonly known as a **data subject access request**) and request certain information in relation to its processing;
- request **rectification** of your personal data;
- request the **erasure** of your personal data;
- request the **restriction** of processing of your personal data;
- **object** to the processing of your personal data; and
- request the **transfer** of your personal data to another party.

If you want to exercise one of these rights please contact us at gdprmmuk@kairospartners.com.

Fees

You will not usually have to pay a fee to access your personal data (or to exercise any of your other rights). However, we may charge a reasonable fee if your request for access is manifestly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is to ensure that personal data is not disclosed to any person who has no right to receive it.

Changes to this privacy notice

We reserve the right to update this privacy notice at any time, and we will make an updated copy of such privacy notice available on our intranet and notify you when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal data.

Further information

This Privacy Notice was written with brevity and clarity in mind and is not an exhaustive account of all aspects of our collection and use of personal data. If you require any further information, please do not hesitate to contact us.