Anavio Privacy Notice

1. Introduction

The term “Anavio” refers to Anavio Capital Partners LLP and Anavio Capital Partners Services (UK) Ltd.

The UK General Data Protection Regulation (“UK GDPR”) regulates the way in which all personal data is held and processed. This policy describes how personal data must be collected, handled, stored, disclosed and otherwise “processed” to meet Anavio’s data protection standards and to comply with UK GDPR.

Anavio is a data controller in respect of personal data it obtains and/or has obtained from current and former: (i) investors (including related personnel), (ii) service providers, counterparties and governmental authorities, (iii) directors of the Fund and (iv) website users. Anavio is responsible for ensuring that it uses the personal data of such persons in compliance with UK GDPR. Anavio regards the lawful and correct treatment of personal data as integral to the successful operations of Anavio, and to maintain the confidence of the people it works with and its investors. To this end, Anavio fully endorses and adheres to the principles of UK GDPR.

2. Purpose

As a data controller, Anavio is required to implement appropriate technical and organisational measures to ensure and to be able to demonstrate that processing is performed in accordance with UK GDPR. The purpose of this policy is to ensure that:

- Anyone involved in the processing of personal data by Anavio is fully aware of, and complies with, the requirements of UK GDPR; and
- Data subjects are aware of their rights under UK GDPR.

3. Scope

All Anavio personnel and any other authorised third parties who have access to any personal data held by or on behalf of Anavio must adhere to this policy.

4. Personal Data

In this policy, “personal data” includes any data which relates to a living individual who can be identified from that data or from that data and other information which is in the possession of, or is likely to come into the possession of, Anavio or its representatives or service providers. In addition to factual information, it includes any expression of opinion about an individual and any indication of the intentions of Anavio or any other person in respect of an individual.

Certain personal data is considered to be particularly sensitive and is subject to stricter rules regarding its processing. These categories of personal data are referred to as “sensitive personal data” and include any personal data relating to the racial or ethnic origin of the data subject; their political opinions; their religious (or similar) beliefs; their physical or mental health condition; details of criminal offences or criminal convictions; and genetic and biometric data.

Examples of personal data that Anavio might hold include names and addresses, contact details, dates of birth, gender, nationality, photographs, signatures, occupational history, job titles, income, assets, other financial information, bank details, investment history, tax residency and tax identification information, emails, call recordings and website usage data.

5. Processing Personal Data

The word “process” (and any derivative term) includes any operation that is carried out in respect of personal data, including but not limited to collecting, storing, using, disclosing, transferring or deleting personal data.

Personal data collected by Anavio is generally collected in order to:

- Respond to reverse solicitation enquiries from potential investors and to assist the investor relations function with various activities including marketing/business development;
- Assist with assessing and processing applications for interests in the Fund and other dealings in respect of interests in the Fund, including to perform know-your-client procedures, issue and redeem interests, receive and make payments, calculate net asset value;
- Carry out general business administration, including communicating with investors and service providers, accountancy and audit services, risk monitoring, administration of IT systems; and
- Comply with legal and regulatory obligations and industry standards, including know-your-client procedures, the automatic exchange of tax information and legal judgments.

6. The Data Protection Principles

Any person processing personal data must comply with the following core principles:

- **Lawfulness, fairness and transparency.** Personal data must be processed fairly, transparently and lawfully.
- **Purpose limitation.** Personal data must be processed only for specified and lawful purposes and must not be processed in any manner which is incompatible with those purposes.
- **Data minimisation.** The personal data that is processed must be adequate, relevant and limited to the minimum data necessary for the lawful purposes for which it is processed.
- **Accuracy.** Personal data must be accurate and, where appropriate, kept up-to-date. Any personal data which is incorrect must be rectified as soon as possible.
- **Data retention.** Personal data must be kept for no longer than is necessary in light of the lawful purpose(s) for which it is processed.
- **Rights of data subjects.** Personal data must be processed in accordance with the rights of data subjects.
- **Security.** Personal data must be protected against unauthorised or unlawful processing, accidental loss, destruction or damage through appropriate technical and organisational measures.
- **International data transfers.** Personal data must not be transferred to a country or territory outside of the UK unless that country or territory ensures an adequate level of protection for the rights and freedoms of data subjects.
- **Accountability.** Anavio and its third-party service providers are responsible for and must be able to demonstrate their compliance with this policy.

7. Consent

Personal data must only be processed if the purpose of the processing satisfies one of the lawful grounds permitted under UK GDPR. One such reason is that the individual has consented to the use of their data. Anavio will not generally seek or obtain consent to the processing of personal data and will therefore generally only process personal data in accordance with the other grounds listed in section 8 below.

Where consent is relied upon, it must be freely given, specific, informed and unambiguous. It must be as easy for a data subject to withdraw consent as it was to provide it. Where consent is obtained, a record of consents will be retained by Anavio to evidence that it has been authorised to carry out the processing.

8. Grounds for Processing Personal Data

The lawful grounds for processing non-sensitive personal data on which Anavio will generally seek to rely include:

- Where processing is necessary for the performance of a contract to which the data subject is a party, or for taking steps at the request of the data subject prior to entering into a contract;
- Where processing is necessary to discharge a relevant legal or regulatory obligation;
- Where processing is necessary for the legitimate business interests of Anavio or another person, such as carrying out ordinary or reasonable business activities, ensuring compliance with legal and regulatory obligations, establishing or defending legal rights, and ensuring the security of information systems.

Sensitive personal data is subject to stricter legal controls. Anavio does not expect to process sensitive personal data in the ordinary course of its business, except that information relating to politically exposed persons may be received in the course of enhanced due diligence. Such processing will only occur where necessary for reasons of substantial public interest.

9. High Risk Processing Activities

It is not expected that the processing of personal data by Anavio is likely to result in a “high risk” to the data subject as determined under UK GDPR. The monitoring or profiling of data subjects and the processing of sensitive personal data on a large scale are examples of processing activities that might present a high risk.

10. Fair Processing Information

Regardless of how personal data is obtained, the data subject must be provided with certain information about the processing of their personal data by Anavio at or before the time at which the personal data is collected. This information must include: the identity and contact details of Anavio; the categories of personal data collected; the purpose(s) and lawful ground for the processing; information about data sharing with third parties; any intention to transfer the personal data outside the UK; the period for which the personal data will be retained; and the existence of the data subject’s rights.

Anavio will provide a privacy notice containing this information to any potential investors prior to them performing any due diligence on Anavio, existing holders of interests in the Fund, and any other individuals whose personal data is received and processed by Anavio.

11. Third Party Service Providers

Where Anavio instructs a third party to process personal data on its behalf (a “data processor”), the third party must enter into a written data processing agreement with Anavio. That agreement must require the third party to process the personal data only in accordance with Anavio’s written instructions, implement appropriate technical and organisational security measures, and impose any additional data processing obligations required by law.

Anavio conducts appropriate due diligence on data processors both at the outset of the relations Anavio and on a periodic basis thereafter.

12. Disclosure of Data

Anavio must ensure that personal data is not disclosed to unauthorised third parties. Personal data should not be disclosed orally or in writing to third parties without appropriate authorisation. In limited circumstances, UK GDPR permits the disclosure of personal data without needing to obtain the prior consent of the data subject, such as where necessary to comply with applicable law, for the administration of justice, or to protect the vital interests of the data subject.

Anavio may from time to time disclose personal data to professional advisers, other service providers of the Fund and Investment Manager, counterparties, and courts and regulatory, tax and governmental authorities.

13. International Transfers of Personal Data

Specific legal requirements apply to the transfer of personal data outside the UK. Personal data must not be transferred outside the UK unless the recipient country ensures an adequate level of protection for the rights and freedoms of data subjects, or appropriate safeguards are in place (such as standard contractual clauses). Anavio will ensure that any transfer outside the UK is subject to appropriate safeguards or is otherwise permitted under applicable law.

14. Retention and Disposal of Data

Personal data must not be retained for longer than is necessary for the lawful purposes for which it is processed. Each category of personal data processed by Anavio must be subject to a retention period which can be justified by reference to those lawful grounds. Upon expiry of the retention period, the relevant personal data must be deleted or anonymised.

Personal data must be disposed of securely in a way that ensures the permanent erasure of the data (e.g. shredding, disposal as confidential waste, or secure electronic deletion).

15. Data Protection and Data Security

Anavio protects the personal data in its possession by applying appropriate technical and organisational security measures. Personal data, whether held electronically or in paper form, must be kept securely at all times. Appropriate measures must be in place to prevent unauthorised or accidental access, use, disclosure, loss or damage.

In the event that personal data has been lost, damaged or become subject to unauthorised third party access, Anavio will notify the Information Commissioner's Office (unless the breach is unlikely to result in a risk to the rights and freedoms of individuals) without undue delay and, where feasible, within 72 hours. Where the breach is likely to result in a high risk to the rights and freedoms of individuals, Anavio will also notify the affected individuals without undue delay.

16. Data Subject Rights

Data subjects have a number of legal rights in relation to their personal data, including:

- The right to obtain information regarding the processing of their personal data and access to the personal data which Anavio holds about them;
- The right to receive a copy of any personal data which Anavio processes about them;
- The right to request that Anavio rectify their personal data if it is inaccurate or incomplete;
- The right to request that Anavio erase their personal data in certain circumstances; and
- The right to lodge a complaint with the Information Commissioner's Office ("ICO") at ico.org.uk.

Requests to exercise these rights will be considered by Anavio as soon as practicable following receipt. To exercise any of your rights, please contact us at ir@anaviocap.com

17. Record Keeping

Accurate and up to date records of the processing activities carried out by Anavio must be maintained within the organisation. These records must include the purposes of the processing, the categories of data subject, the categories of recipients of personal data, any transfers outside the UK, envisaged time limits for erasure, and a general description of the technical and organisational security measures adopted.

18. Roles and Responsibilities

Anavio is ultimately responsible for ensuring that the firm meets its legal obligations under UK GDPR. This includes reviewing all data protection procedures and related policies, dealing with requests from individuals to see the data held about them, reviewing and approving contracts with data processors, and ensuring all systems used for storing personal data meet acceptable security standards.

Jon Howard

Designated Member, Anavio Capital Partners LLP

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