

# GDPR Privacy Notice

## Data protection privacy notice

Keen Venture Partners are committed to protecting your personal information and ensuring we respect your privacy. When used in this notice, “Keen Venture Partners” or “we” means Keen Venture Partners LLP or any of its subsidiaries or related companies. This Privacy Notice explains how we will look after and use any personal information that we collect about you. This policy may be amended or updated to reflect changes in our practices from time to time. We suggest that you regularly check this page to review any change we might make in accordance with the terms of this Policy. This policy was last updated on 22 May 2018.

## What is personal information?

Personal information means any information about you from which you can be identified. Examples of personal information include your name, home address, national insurance number, date of birth, telephone number and e-mail address but it also includes other pieces of information which can be used to identify you, either directly or indirectly, such as a cookie.

## Who we are

Keen Venture Partners LLP is the Controller of the personal information you provide to us. If you have any questions about this Privacy Notice or the information we hold about you please contact us using the details set out below:

Full name of legal entity: Keen Venture Partners LLP

Email address: sara@keenventurepartners.com

Postal address: Michelin House, Office 121, 81 Fulham Road, London, SW3 6RD

Contact telephone numbers: +44 (0)20 3826 0314

You have the right to make a complaint at any time to the Information Commissioner’s Office (ICO), the UK supervisory authority for data protection issues. We would however appreciate the chance to deal with your concerns before you approach the ICO, so please contact us in the first instance.

## What types of information do we use?

We collect information in the course of providing our financial services to you. The information which we collect, use, store and transfer about you are:

- Employment details (job title, company name, address etc.);
- Payment information (bank account, credit card or other details);
- Educational history;
- Employment or work history/background;
- Information on trading or other financial activity;
- Contractual/contact information (i.e. our ‘history’ together – services provided or discussed);

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- Instructions or requests (for example if you ask for investment advice or to carry out a trade);
  - Financial information (financial position and history);
  - Documentary data (things can include passport or drivers licence or other forms of identification);
  - Public records (or openly accessible data) such as the Electoral Register;
  - Social and or demographic (profession, work, goals, nationality, income or family situation)
  - Historical information i.e. previous names and addresses;

Keen Venture Partners does not generally collect or process your Sensitive Personal data. Should we need to do so it would be because:

- The Processing is necessary for compliance with a legal obligation;
- The Processing is necessary for the detection or prevention of crime;
- You have made the Sensitive Personal data public; or
- We have obtained your consent prior to Processing your Sensitive Personal data

## Consequences of not providing some types of information

Where we need to collect your personal information by law, or under the terms of a contract we have with you, and you fail to provide that information when requested, we may not be able to provide the goods or services you asked for. In this case we may have to cancel the product or services but we will tell you if this is the case.

## How do we collect information about you?

Typically, Keen Venture Partners will collect information from you when you contact us directly or provide information in order for us to provide our products and services. We collect information from and about you in the following ways primarily through **direct interactions** when you give us your personal information by filling in forms or during correspondence with us. This includes when you:

- Subscribe to our funds; or
- Meet with us in person or talk to us face to face.

## How we will use your personal information

We only obtain, use and keep personal information where we need it for a specific purpose. We set out in the table below the ways in which we plan to use your personal information. We are only able to use your personal information if we have a proper legal reason or basis for doing so. This is called a legal basis and the regulations require that we have a legal basis so that your privacy is protected. Most commonly we will use your information in the following ways:

- We have a **contract** with you. For example, we manage a fund for which you are an investor in accordance with the constitutional documents of the fund.
- We have a **legal obligation**. We need to use your personal information to comply with laws that assist in the prevention of financial crime and to comply with regulatory obligations. For example this might include confirming your identity and source of wealth, as well as ensuring we provide you with necessary information so you understand the risk of the financial services we can provide.

- We, or a third party, have a **legitimate interest** in processing the information and your interests and fundamental right do not override those interests. For example, processing your information to source deals.

We set out in the table below all the ways we plan to use your personal information and the legal bases we rely on to do so. We also explain what our legitimate interests are where appropriate:

Purpose	Lawful basis for processing including our legitimate interests
To facilitate investment into our funds and co-investment opportunities and comply with our obligations as manager as set out in the constitutional documents of the funds.	To fulfil our contact with investors
To facilitate investment into portfolio companies and provide advice and assistance to help our portfolio companies grow.	To fulfil our investment agreements with management companies
To acquire and exit investments	To fulfil the purchase or sale agreement
To purchase services from our suppliers	To fulfil our contracts with suppliers
To comply with our KYC and customer due diligence obligations.	To fulfil our regulatory obligations
We process the personal data of a wide variety of business contacts for the purposes of conducting key parts of venture capital business, such as fundraising, generating deal flow, and recruiting management teams.	Necessary for our legitimate interests – to conduct the business of a venture capital fund manager

We will only use your personal information for the reason for which we collected it. We will only use it for another reason if we believe that new reason is compatible with the original purpose. If we do need to use your personal information for a non-related purpose we will tell you about it and explain the legal basis which allows us to do so.

### Who we share your information with

We may need to provide information to third parties for a variety of reasons, for example, we may need to provide information to assist in the detection or prevention of crime or for the purpose of safeguarding national security. Please refer to the table in the section ‘How we will use your personal information’ which explains how we use your data. The third parties we share your information with are as follows:

- The funds you are invested in
- Our service providers such as accountants, fund administrators, compliance consultants, professional advisers and lawyers
- Counterparties to a transaction

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## **Sending your information outside of the EEA**

The regulations which have been put in place to protect your privacy apply throughout the EEA. The EEA is the European Economic Area which includes all the countries in the European Union plus Iceland, Liechtenstein and Norway. This means that any country within the EEA must meet the same privacy standards as the United Kingdom. All the personal information that we hold about you will be processed in the EEA.

## **Storing your information**

As a financial services provider we will typically have a contract with you and will need to keep your personal information (updated to ensure accuracy) to fulfil our contract. We also need to comply with EU and UK law, which often requires us to keep certain records - which will include certain personal information – for several years.

Our policy is to keep records on prospective investors, management teams and other business contacts indefinitely we may wish contact long standing contacts about a particularly relevant opportunity in the future, and in the context of venture capital and private equity business there is no way to predict when such an opportunity might arise. We will ensure all records are safely destroyed if we no longer need to retain them. We review our retention periods for personal information on a regular basis. We will tell you if we change the retention period.

## **Your rights**

You are provided with a number of different rights under the data protection laws in relation to your personal information. These allow you:

- To access your information;
- To request we correct your information;
- To request that we erase your information;
- To object to the processing of your information;
- To request a restriction in the processing of your information;
- To request a transfer of your information;
- Complain to the Information Commissioner's Office; and
- To withdraw your consent.

If you wish to exercise any of these rights please call us on +44 (0)20 3826 0314, email [sara@keenventurepartners.com](mailto:sara@keenventurepartners.com) or write to the Head of Compliance at Michelin House, Office 121, 81 Fulham Road, SW3 6RD. Please note that you will not have to pay a fee to access your personal information or to exercise any of the other rights. We may, however, charge a reasonable fee if your request is clearly unfounded, repetitive or excessive or we may refuse to deal with your request. We may also need to seek further information from you to confirm your identity before we release any personal information. This does not affect your right to make a complaint.