

**2R Capital Investment
Management Limited
Privacy Notice**

2R CAPITAL INVESTMENT MANAGEMENT LIMITED

Data Privacy Notice

1. Welcome

2R Capital Investment Management Limited (collectively referred to as "2RC ", "we", "us" or "our" in this privacy notice) is strongly committed to protecting personal data. This privacy statement describes why or how we collect and use personal data and provides information about individuals' rights. It applies to personal data provided to us, both by individuals themselves or by others.

Personal data is any information relating to an identified or identifiable living person. 2RC processes personal data for numerous purposes, and the means of collection, lawful basis of processing, use, disclosure and retention periods for each purpose may differ.

This Privacy Notice tells you how we look after your personal data when you visit our website and at other points at which we collect your personal data. It tells you about your privacy rights and how the law protects you. This Privacy Notice may be presented separately to describe how we will use personal data in specific scenarios.

We may use personal data provided to us for any of the purposes described in this privacy notice or as otherwise stated at the point of collection. This document may also be described as a Fair Processing Notice.

Finding your way around this privacy statement

This Privacy Notice is set out at follows.

Content	Page number
Important information about us	3
A request we would like to make of you	3
Letting you know about 2RC	4
The Type of personal data we collect about you	4
Where do we get your personal data from?	5
How we use your personal data	5
Purposes for which we use your personal data	6
Disclosures of your personal data	7
International data transfers	7
Data security	8
Data retention	8
Exercising your legal rights	9
Glossary	10
Contact us	11

2R CAPITAL INVESTMENT MANAGEMENT LIMITED

Data Privacy Notice

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

2. Important information about us

This privacy notice aims to give you information on how 2RC collects and processes your personal data through the use of our website. 2RC acts as a controller of personal data and is responsible for your personal data in connection with its activities. 2RC is the data controller which is responsible for this website.

We have appointed a data protection officer (DPO) who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the DPO using the details set out below.

Contact details	
Name or title of DPO:	Zoë Anderson
Email address:	zoe.anderson@2rcapitalim.com
Postal address:	5 th Floor, 2 Queen Anne's Gate Buildings, Dartmouth Street, London, SW1H 9BP
Telephone number:	+44 20 8194 5603

Changes to this privacy statement

We recognise that transparency is an ongoing responsibility, so we will keep this privacy notice under regular review. This privacy notice was last updated on 31.12.2019.

Making a complaint

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.

3. A request we would like to make of you

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

2R CAPITAL INVESTMENT MANAGEMENT LIMITED

Data Privacy Notice

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter with you. We will notify you if this is the case at the time.

4. Letting you know about 2RC

2RC at present does not engage in or undertake direct marketing or hold events. Should 2RC engage in these activities in the future, we may invite you to one or more events. In this case, we may use your identity, contact, technical, usage and profile data to form a view on what we think you may want or need, or what may be of interest to you. Accordingly, you may receive such invitations unless you have expressed 'opted out' consent not to receive such invitations, as noted below.

Newsletters & Contact by Social Media

In addition, 2RC and its affiliates at present do not send out monthly magazines through the post, newsletters by email or other social media methods such as WhatsApp, Twitter or SMS text messages. We may however engage in these activities in the future.

Opting out

Should 2RC engage in the activities as mentioned above, we shall update our website and provide means for opting out. You can then ask us to stop sending you such invitations at any time by logging into the website and following the 'opt out' links on any invitations sent to you or by contacting us any time.

5. The Type of personal data we collect about you

When we refer to collecting or using personal data, or personal information, we are referring to any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

Types of personal data that we collect, store, use and transfer	
Identity Data	This includes first name, last name, username or similar identifier, title, membership number (if applicable), title or office held.
Contact Data	This includes billing address, delivery address, email address and telephone numbers.
Technical Data	This includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser

2R CAPITAL INVESTMENT MANAGEMENT LIMITED

Data Privacy Notice

	plug-in types and versions, operating system and platform and other technology on the devices you use to access our website.
Profile Data	This includes your username and password, your interests, preferences, feedback and survey responses.
Usage Data	This includes information about how you use our websites
Events Data	This includes your preferences in receiving information about (or invites to) events and your communication preferences.

We may also collect, use and share Aggregated Data (i.e. Anonymous Data) such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature.

Details of the data we collect, why we collect it and what we use it for are listed below.

6. Where do we get your personal data from?

We use different methods to collect data from and about you. We have set this out in the table below.

How we collect personal data	
Direct Interactions	<p>You may give us your Identity and Contact details by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you may provide when you:</p> <ul style="list-style-type: none"> request that details of events be sent to you Filling in any forms on our websites give us some feedback;
Automated technologies or interactions.	As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns.
Third parties or publicly available sources.	<p>We may receive personal data about you from various third parties and public sources as set out below:</p> <p>Technical Data from parties such as Google based outside the EU.</p> <p>Identity and Contact Data from publicly available sources such as Companies House and the Electoral Register based inside the EU.</p>

2R CAPITAL INVESTMENT MANAGEMENT LIMITED

Data Privacy Notice

7. How we use your personal data

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

- Where we have your consent to do so.
- Where we need to perform a contract which we are about to enter, or have entered into, with you.
- Where we need to comply with a legal or regulatory obligation.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

8. Purposes for which we use your personal data

We have set out below, in a table format, a description of particular activities in which we engage, and according to which we process personal data. Further, we have set out the legal basis which we rely on in order to do so. We have also identified our legitimate interests for processing personal data, where appropriate.

Note that we may process your personal data on more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

To quickly go to the right function, please choose from the following options.

Specific purpose or activity	Type of data used	Lawful basis for processing (Article 6 GDPR)
To register you as a new client or supplier (KYC information)	Identity Data Contact Data Financial Data	Legitimate Interest, Legal Obligation & performance of a contract
To enter into any non-disclosure arrangements with you	Identity Data	Legitimate Interest & Legal Obligation

2R CAPITAL INVESTMENT MANAGEMENT LIMITED

Data Privacy Notice

To manage our relationship with you which may include notifying you about changes to our terms or privacy policy	Identity Data Contact Data	Legitimate Interest & Legal Obligation
To administer and protect our business and our website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	Identity Data Contact Data Profile Usage Technical	Legitimate Interest
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	Identity Data Contact Data Profile Usage Technical	Legitimate Interest

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another purpose. This new purpose must be compatible with the original purpose for which we collected your data. If you have any questions concerning this matter, please contact us.

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.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where we are required, or permitted to do so by law.

9. Disclosures of your personal data

2RC may need to share your personal data with the parties set out below. Our purposes for doing so are set out in the table.

External third parties		
Type of professional advisers acting as processors or joint controllers	Country in which company is based	Service provided / need for disclosure
Lawyers	United Kingdom	Legal services
Bankers	United Kingdom	Banking services
Accountants	United Kingdom	Accounting services
Auditors	United Kingdom	Accountancy services
Insurers	United Kingdom	Insurance services
HM Revenue & Customs, regulators and other authorities	United Kingdom	Require reporting of processing activities in certain circumstances

2R CAPITAL INVESTMENT MANAGEMENT LIMITED

Data Privacy Notice

acting as processors or joint controllers		
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We require all third parties to respect the security of your personal data and to treat it in accordance with the law and our own specific and stringent security requirements. We do not allow the above third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions

10. International data transfers

Some of our external third parties are based outside the European Economic Area (EEA). Therefore, their processing of your personal data will involve a transfer of data outside of the EEA.

Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission. For further details, see European Commission: 'Adequacy of the protection of personal data in non-EU countries'.
- Where we use service providers in countries that have not been deemed to provide an adequate level of protection, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe. For further details, see European Commission: 'Model contracts for the transfer of personal data to third countries'.
- Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US. For further details, see European Commission: EU-US Privacy Shield.

Please contact us if you wish to receive further information on the specific mechanism which we use when transferring your personal data out of the EEA.

11. Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, altered, disclosed and/or processed in an unauthorised manner. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have an operational 'need to know'. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

2R CAPITAL INVESTMENT MANAGEMENT LIMITED

Data Privacy Notice

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

12. Data retention

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

To determine the appropriate retention period for personal data, we consider the following criterion: the amount, nature, and sensitivity of the personal data; the potential risk of harm from unauthorised use or disclosure of your personal data; the purposes for which we process your personal data; whether we can achieve those purposes through other means; and the applicable legal requirements.

Details of retention periods for different aspects of your personal data are available in our retention policy, which you can request us by contacting us.

In some circumstances, you can ask us to delete your data: see "Request Erasure" below for further information.

In some circumstances, we may anonymise your personal data (so that you can no longer be identified through the data) for research or statistical purposes. According to the law, anonymous data is not classed as personal data, as the data cannot be used to identify any given individual. As such, we are permitted by law to use anonymous data indefinitely without further notice to any data subject.

13. Exercising your legal rights

Under certain circumstances, you have rights under data protection law in relation to your personal data.

- [Request access to your personal data](#)
- [Request correction of your personal data](#)
- [Request erasure of your personal data](#)
- [Object to processing of your personal data](#)
- [Request restriction of processing your personal data](#)
- [Request transfer of your personal data](#)
- [Right to withdraw consent](#)

If you wish to exercise any of the rights set out above, please contact us.

2R CAPITAL INVESTMENT MANAGEMENT LIMITED

Data Privacy Notice

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these 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 your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

14. Glossary

LAWFUL BASIS

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by Contacting us.

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Comply with a legal or regulatory obligation means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

EXTERNAL THIRD PARTIES

- Professional advisers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services.

2R CAPITAL INVESTMENT MANAGEMENT LIMITED

Data Privacy Notice

- HM Revenue & Customs, regulators and other authorities based in the United Kingdom who require reporting of processing activities in certain circumstances.

YOUR LEGAL RIGHTS

- **Request access to your personal data** (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that your data is being lawfully processed.
- **Request correction of the personal data that we hold about you.** This enables you to request that any incomplete or inaccurate data which we hold about you is corrected, though we may need to verify the accuracy of the new data which you provide to us.
- **Request erasure of your personal data.** This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data in the following circumstances: where you have successfully exercised your right to object to processing (see below); where we may have processed your information unlawfully; or where we are legally required to erase your personal data. Please note, however, that we may not always be able to comply with your request of erasure due to specific legal reasons. If such circumstances arise, you will be notified at the time of your request.
- **Object to processing of your personal data where we are relying on a legitimate interest** (or those of a third party) if our legitimate interest is overridden by your own interests and/or fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes.
- **Request restriction of processing of your personal data.** This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where you consider our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- **Request the transfer of your personal data to yourself or to a third party.** We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Please note, this right only applies to automated information which you initially provided consent for us to use, or where we used the information to perform a contract with you.
- **Withdraw consent at any time where we are relying on consent to process your personal data.** However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you at the time if this is the case.

2R CAPITAL INVESTMENT MANAGEMENT LIMITED

Data Privacy Notice

15. Contact us

As mentioned above, we have appointed a Data Protection Officer (DPO) to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please contact our DPO.