



PRIVACY NOTICE

ZEBEDEE CAPITAL PARTNERS LLP

This Privacy Notice explains how Zebedee Capital Partners LLP collects, uses and discloses your personal data, and your rights in relation to the personal data it holds.

In this Privacy Notice, “us”, “we” and “our” refers to Zebedee Capital Partners LLP.

We are the data controller of your personal data and for the purposes of data protection law, such as the European Union’s General Data Protection Regulation (“GDPR”). We are responsible for ensuring that we use your personal data in compliance with data protection law.

If you have any queries with regard to this policy please email: dataprotection@zebedeecapital.com.

We may amend this Privacy Notice from time to time, to reflect any changes in the way that we collect and use your personal data. This Privacy Notice supersedes any previous versions you may have received from us.

Please take the time to read and understand this Privacy Notice.

HOW WE COLLECT YOUR DATA

We may collect your personal data in a number of ways, for example:

- From the information you provide to us when you meet with one of our team or when we communicate with you by telephone, email or any other form of electronic communication. In this respect, we may monitor, record and store any such communication;
- From third parties; and
- From publicly available sources.

THE CATEGORIES OF THE DATA WE COLLECT

We may collect the following categories of personal data about you:

- Your name, and contact information such as mailing or email address and telephone number;
- Information about your employment and education; and
- In the event you are an individual investor looking to be categorised as an Elective Professional Client, information relating to your knowledge, experience, skills and ability.

USES OF YOUR PERSONAL DATA

We may process your personal data because it is necessary for our legitimate interests or to fulfil our contractual obligations.

- We may use your personal data to provide you with information about us or one of the alternative investment funds managed by us (“the Zebedee Funds”) that you (or a third party you represent) have invested in or which you (or a third party you represent) have expressed an interest in.
- We may use your personal data to carry out our ordinary or reasonable business activities or for general business administration, including communicating with service providers and counterparties.
- If you have entered into a contract with us, processing will be necessary for the performance of that contract, or will be done at your request prior to the contract.
- We may also process your data for our compliance with relevant legal or regulatory obligations.

DISCLOSURE OF YOUR PERSONAL DATA TO THIRD PARTIES

From time to time, in accordance with the purposes described above, we may disclose your personal data to other parties, including (a) the Zebedee Funds’ administrator, (b) professional advisers such as law firms and accountancy firms, (c) other service providers, including technology service providers, (d) counterparties and (e) courts and regulatory, tax and governmental authorities. Some of these persons will process your personal data in accordance with our instructions and others will themselves be responsible for their use of your personal data. These persons may be permitted to further disclose the personal data to other parties.

TRANSFERS OF YOUR PERSONAL DATA OUTSIDE THE EUROPEAN ECONOMIC AREA

- Your personal data may be transferred to and stored by persons outside the European Economic Area (the “EEA”).
- Where personal data is transferred outside the EEA, we will ensure that the transfer is subject to appropriate safeguards or is otherwise permitted under applicable law.
- You can obtain more details of the protection given to your personal data when it is transferred outside the EEA, by contacting us using the details set out under “Contacting Us” below.

RETENTION OF PERSONAL DATA

How long we hold your personal data for will vary. The retention period will be determined by various criteria, including the purposes for which we are using it (as it will need to be kept for as long as is necessary for any of those purposes) and legal obligations (as laws or regulations may set a minimum period for which we have to keep your personal data).

YOUR RIGHTS

You have a number of legal rights in relation to the personal data that we hold about you. These rights include the following:

- i. The right to obtain information regarding the processing of your personal data and access to the personal data that we hold about you.
- ii. In some circumstances, the right to receive some personal data in a structured, commonly used and machine-readable format and the right to request that we transmit that data to a third party where this is technically feasible. Please note that this right only applies to personal data which you have provided to us.
- iii. The right to request that we rectify your personal data if it is inaccurate or incomplete.
- iv. The right to request that we erase your personal data in certain circumstances. Please note that there may be circumstances where you ask us to erase your personal data but we are legally required or permitted to retain it.
- v. The right to object to, and the right to request that we restrict our processing of your personal data in certain circumstances. Again, there may be circumstances where you object to, or ask us to restrict our processing of your personal data but we are legally required or permitted to continue processing your personal data or to refuse that request.
- vi. The right to lodge a complaint with the data protection regulator (details of which are provided below) if you think that any of your rights have been infringed by us.

You can exercise your rights by contacting us using the details set out under “Contacting Us” below. You can find out more information about your rights by contacting an EU data regulator such as the UK’s Information Commissioner’s Office, or by searching its website at ico.org.uk.

CONTACTING US

If you would like further information on the collection, use, disclosure, transfer or processing of your personal data or to exercise any of the rights listed above, please address questions and requests to:

Zebedee Capital Partners LLP

By telephone: +44 (0) 20 7440 1600

By email: dataprotection@zebedeecapital.com