



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.

Zebedee Capital Partners is authorised and regulated by the Financial Conduct Authority (FCA) in the United Kingdom. We manage/advise investment vehicles which are restricted to professional investors only, including institutional investors and other entities categorised as professional clients under the FCA rules.

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

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 or anything to the contrary contained in any agreement with us. The most current version will be available at <https://www.zebedeecapital.com/wp-content/uploads/2021/11/Zebedee-Capital-Partners-LLP-Privacy-Notice.pdf> or by contacting us at dataprotection@zebedeecapital.com.

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

HOW WE COLLECT YOUR DATA

We may collect and process 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 publicly available sources; and
- From third parties.

THE CATEGORIES OF THE DATA WE COLLECT

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

- Identity and Contact Information: name, job title, employer, business contact details.
- KYC/AML Data: date of birth, passport or ID information, national insurance number, source of funds/wealth, and other data collected for compliance purposes.
- Professional Information: regulatory classification, employment background, qualifications.
- Technical Data: IP address and usage data from our website (if applicable).



We typically do not collect sensitive ("special category") data

THE BASIS FOR PROCESSING YOUR DATA, HOW WE USE THAT DATA AND WITH WHOM WE SHARE IT

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

In summary, we rely on the following legal bases under UK GDPR:

- Performance of a contract: to manage our relationship with you as a client or investor.
 - Legal obligation: to comply with regulatory or legal obligations (e.g. AML, FCA rules).
 - Legitimate interests: where processing is necessary for our business operations, provided your interests and rights do not override those interests.
 - Consent: where required, e.g., for certain marketing communications
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- We may use your personal data to carry out our ordinary or reasonable business activities or for general business administration, including communicating with investors, service providers and counterparties.
 - If you have entered into a contract with us, some processing will be necessary for the performance of that contract, or will be done at your request, prior to entering into that contract.
 - We may use your personal data to provide you with information about us or the alternative investment fund managed by us ("the TIG Zebedee Core Fund") that you (or a third party you represent) have invested in or in which you (or a third party you represent) have expressed an interest.
 - We may also process your data for our compliance with a legal obligation which we are under. In this respect, we may use your personal data to meet our regulatory obligations, with regard to conducting due diligence on investors in the TIG Zebedee Core Fund.
 - From time to time, in accordance with the purposes described above, we may disclose your personal data to other parties, including (a) the Zebedee Fund's 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. We require all third parties to respect the security of your personal data and to process it in accordance with the law.

TRANSFERS OF YOUR PERSONAL DATA OUTSIDE THE UNITED KINGDOM

We may transfer your personal data outside the UK. Where we do so, we ensure appropriate safeguards are in place (e.g., UK-approved Standard Contractual Clauses or adequacy decisions).



RETENTION OF PERSONAL DATA

How long we hold your personal data for will vary. We retain personal data only for as long as necessary to fulfil the purposes for which it was collected. 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). , including for legal, regulatory, tax, or accounting requirements. Typically, the retention period will be 6 years after the end of a client relationship, unless a longer period is required by law.

YOUR RIGHTS

Under the UK GDPR, 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 entitled 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 entitled 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 the UK’s Information Commissioner’s Office. Full contact details are available on the ICO’s 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 on +44 (0) 20 7440 1600, or by email to dataprotection@zebedeecapital.com.

Last Review Date: June 2025