FitzWalter Capital

Privacy Policy

Introduction

Introduction and who we are

FitzWalter Capital Limited, a limited company registered in UK with registration number 12400257, whose registered address is at 3rd Floor, 1 London Square, Cross Lanes, Guildford, GU1 1UN, United Kingdom. The pages on this website are published on behalf of FitzWalter Capital Limited.

FitzWalter Capital Limited ("FitzWalter Capital Limited" or "we") respect your right to privacy and will process personal information you provide only in accordance with applicable data protection and privacy laws.

This privacy policy sets out how FitzWalter Capital Limited processes the personal information of our website visitors, clients, business contacts, suppliers and investors. Investors should also refer to privacy notices and related information set out in any applicable Offering Memorandum or subscription agreement, including for information about other data controllers of personal information. In the event of any inconsistency between this privacy policy and a notice provided in any Offering Memorandum or subscription agreement, that other notice will prevail.

If you have any questions about this privacy policy or any other privacy policies mentioned above please contact us in writing for the attention of: the COO and GC at 14 Hay's Mews, London, W1J 5PT or by email to legalnotices@fwcap.com

How we collect personal information

When you visit FitzWalter Capital Limited's website, we collect some basic information such as your browser type, IP address, internet service provider's domain name, which pages you accessed on the site, and when. Details of cookies used on the website can be found on the Cookie notice.

FitzWalter Capital Limited uses this information to provide you with and maintain the quality of the website and to analyse the use of the website in order to help guide improvements.

If you register for the alert service, you will need to provide your name and email address. This information will be used for administration of the alert service.

We will also collect and store your personal information when you contact FitzWalter Capital Limited or when corresponding with us in relation to a transaction that we and/or the funds we manage enter into or correspondence regarding a potential transaction.

We collect personal information in writing, by telephone and by e-mail. We may receive information from third parties who collect personal information from you and pass it on to us for example where we conduct verification or anti-money laundering checks for prospective transactions.

What personal information do we hold about you

Personal information means any information relating to a person that identifies a person or enables them to be identified either directly or indirectly. Personal information that we hold about you (as well as that collected by the website noted above) may include your name, address, email address and phone number.

If you are a business contact, personal information we will hold about you may also include your job title, employer organisation and perhaps your CV.

If you are a job applicant, we may also hold information you have provided to us in your CV, application form and covering letter, as well as your date of birth, gender and any information you provide to us as during an interview. We may also hold special categories of more sensitive personal information such as your race or ethnicity and information about your health including any medical condition.

In connection with offering, forming and operating private investment funds for potential investors, we may collect, record, store, adapt, and otherwise process and use personal information either relating to potential investors or to their partners, officers, directors, employees, shareholders, ultimate beneficial owners or affiliates or to any other data subjects. Personal information collected may include: (a) names, dates of birth and birth place, (b) contact details and professional addresses (including physical addresses, email addresses and telephone numbers) (c) account data and other information contained in any document provided by potential investors (whether directly or indirectly); (d) risk tolerance, transaction history, investment experience and investment activity; (e) information regarding a potential investor's status under various laws and regulations, including such person's social security number, tax status, income and assets; (f) accounts and transactions with other institutions; (g) information regarding a potential investor's interest in the relevant fund, including ownership percentage, capital investment, income and losses; (h) information regarding a potential investor's citizenship and location of residence; (i) source of funds used to make the investment in the relevant fund; and (j) anti-money laundering, identification (including passport and drivers' license), and verification documentation.

We will take reasonable steps to keep the personal information that we store accurate. If you consider that any of the personal information that FitzWalter Capital Limited holds about you is incorrect please notify us.

How we use your information

We will use your personal information, and may share your personal information with other parties acting on our behalf, for one or more of the following purposes:

- to conduct research about the use of our website;
- for our own administrative purposes, including training our staff, conducting internal audits or transferring assets as part of a sale, purchase or investment in our business;
- if you are a party to a contract with us, to carry out our contract with you;
- assessing potential transactions and assessing your suitability for involvement in a transaction, including verifying your identity and source of funds;
- for market research purposes;
- to conduct investigations of suspicious or harmful activity or to protect against, identify and prevent fraud and other unlawful activity;
- to assess and respond to a complaint you might make to us;
- verifying your identity as a prospective investors for the purpose of complying with the statutory and regulatory requirements of a fund and any functionary of a fund in relation to anti-money laundering;
- evaluating and complying with any anti-money laundering, regulatory and tax requirements in respect of a fund;
- ongoing communication with potential investors, their representatives, advisors and agents (including the negotiation, preparation and signature of documentation) during the process of admitting potential investors to a fund;
- contacting investors with information about other products and services which we consider may be of interest to investors;
- performing relevant contractual obligations and administering an investor's investment in a fund; and
- fulfilling requests or reply to inquiries you make;
- sending you promotional materials, newsletters and other communications;
- to comply with our and our funds' regulatory and legal obligations, such as those relating to anti money laundering legislation, compliance with US Foreign Account Tax Compliance Act ("FATCA") and the OECD common reporting standard ("CRS") (as well as any legislation, regulations or

guidance enacted in any jurisdiction that seeks to implement a similar tax reporting or withholding tax regime), and where information is required or requested by applicable regulators.

We do not sell your personal information to others. If we wish to use your personal information for a purpose beyond that for which it was originally provided and the further purpose is not compatible with the original purpose, we will ask for your consent or seek to rely on another valid legal ground to process your personal information in accordance with the applicable law.

Information for marketing purposes

Where you act on behalf of an organisation, or where you are an individual who has consented to us using your personal information for marketing purposes, we may use your information to conduct marketing and data analysis or in order to keep you informed about FitzWalter Capital Limited and its business partners' products and services, which we consider may be of interest to you. Please note we do not share your personal information with those partners.

If at any time after you have consented to us using your information for marketing purposes you wish us to stop using your information for these purposes, please contact us at the details set out above.

Grounds for processing

To process your data lawfully we need to rely on one or more valid legal grounds. The grounds we may rely upon include:

- your consent to particular processing activities. For example, where you have consented to us using your information for marketing purposes;
- our legitimate interests as a business (except where your interests or fundamental rights override these). For example, it is within our legitimate interests to use your data to prevent or detect fraud or abuses of our website;
- our compliance with a legal obligation to which FitzWalter Capital Limited is subject. For example, we have a duty to investigate and respond to complaints made against us and may need to process your personal information as part of such investigation; or
- if you are a party to a contract because processing your personal information is necessary for the performance of a contract.

Third-party use of information

There are circumstances where we may wish to disclose or are compelled to disclose your personal information to third parties. This will only take place in accordance with the applicable law and for the purposes listed above. These scenarios include disclosure to:

- our group entities;
- our outsourced service providers or suppliers to facilitate the provision of our services;
- to our outsourced third party service providers who process personal information on our behalf such as providers of cloud hosting solutions, website hosts or providers of data storage or security;
- another legal entity, on a temporary or permanent basis, for the purposes of (or in contemplation of) a joint venture, collaboration, financing, sale, merger, reorganisation, change of legal form, dissolution or similar event. In the case of a merger or sale, your personal data will be permanently transferred to a successor entity;
- to professional advisors such as lawyers and accountants, fund administrators or other consultants;
- public authorities where we are required by law to do so;

- to other investors or potential investors where we believe it is reasonable to do so; and
- to any other third party where you have provided your consent.

International transfers

FitzWalter Capital Limited may transfer personal information that is collected from you to third-party data processors located in countries that are outside of the United Kingdom, Jersey and the European Economic Area ("EEA") in connection with the above purposes. Please be aware that countries which are outside the United Kingdom and the EEA may not offer the same level of data protection as the United Kingdom. In these circumstances we will, as required by applicable law, ensure that your privacy rights are adequately protected by appropriate technical, organisational, contractual or other lawful means. Please contact us if you would like more information about how your personal information may be transferred by FitzWalter Capital Limited and the safeguards that we have put in place.

Retention of personal information

We will take all reasonable steps to retain personal information only for the duration of the purpose for which it was obtained as set out in this privacy policy (unless longer retention is required by the applicable law or regulation). We may keep an anonymised form of your personal information, which will no longer refer to you, for statistical purposes without time limits, to the extent that we have a legitimate and lawful interest in doing so. We will hold certain personal information and other information regarding investors in funds for at least as long as they remain investors. The retention period may extend beyond the investment term where necessary for the fund's legitimate interests, including to comply with legal or regulatory obligations or to facilitate the fund's ongoing administration and performance.

Security

FitzWalter Capital Limited seeks to safeguard all personal information that you provide to us, to ensure that it remains confidential and secure and to take all reasonable steps to ensure that personal privacy is respected.

Whilst FitzWalter Capital Limited takes appropriate technical and organisational measures to safeguard the personal information that you provide, no transmission over the internet can ever be guaranteed secure. Consequently, please note that the security of any personal information that you transfer over the internet FitzWalter Capital Limited cannot be guaranteed.

All our data is stored in written or electronic form on our servers and computers and in various physical locations. We maintain physical, electronic and procedural safeguards designed to protect your personal information from misuse, unauthorised access or disclosure and loss or corruption by computer viruses and other sources of harm. We restrict access to personal information to those staff members, joint venture partners, group entities and third parties who need to know that information for the purposes set out in this privacy policy.

Your rights

Data protection law provides individuals with certain rights, including the right to: access, rectify, withdraw consent, erase, restrict, transport, and object to the processing of, their personal information. Individuals also have the right to complain to us and to lodge a complaint with the relevant data protection authority if they believe that their personal information is not being processed in accordance with the law. Further information about your rights is set out below:

- the right to be provided with copies of personal information that FitzWalter Capital Limited hold about you, free of charge;
- the right to ask FitzWalter Capital Limited to update and correct any out-of-date or incorrect personal information held about you, free of charge;
- the right to withdraw consent, as permitted by law, to the processing of your personal information at any time. Such withdrawal will not affect the lawfulness of processing based on your previous consent. Please note that if you withdraw your consent, you may not be able to benefit from certain service features for which the processing of your personal information is essential;
- the right to object to processing and to request that we stop processing your personal information, as permitted by law;
- the right to request that we erase your personal information, with which we will comply, unless there is a lawful reason for not doing so;
- the right to complain to us if you consider we have processed your personal information in breach of data protection law — the Data Protection Complaints section of our Complaints Policy, available on our website, explains how to make a complaint and what to expect, including that we will acknowledge your complaint within 30 days of receipt and we will inform you of the outcome without undue delay; and
- the right to lodge a complaint with the supervisory authority.

We suggest that you contact us about any questions or if you have a complaint in relation to how we process your personal information, which you can do using the channels set out in the Data Protection Complaints section of our Complaints Policy. You also have the right to contact the relevant supervisory authority, which in the UK is the Information Commissioner's Office (www.ico.org.uk).

If you wish to exercise any of the above rights, please write to FitzWalter Capital Limited (as appropriate) at the contact details specified above.

We do not use personal information for any automated decision-making or profiling purposes.

Third-party sites

The website may contain links to other websites operated by third parties. Please note that this privacy policy applies only to the personal information FitzWalter Capital Limited collect and FitzWalter Capital Limited cannot be responsible for personal information that third parties may collect, store and use through their website. You should always read carefully the privacy policy of each website you visit.

Compliance with privacy laws

FitzWalter Capital Limited is bound by the data protection and privacy laws to which it is subject. You should satisfy yourself that you are familiar with those laws, including any exceptions which may apply under them. You should also be aware that privacy laws in various jurisdictions may change from time to time. Except to the extent expressly stated otherwise in this privacy policy, FitzWalter Capital Limited accepts no obligations with respect to the handling of personal information other than those mandated by law in any relevant country.

Changes to this policy

As we strive to improve our practices, we may review this policy from time to time. We reserve the right to change this policy at any time and to notify you of those changes by posting an updated version of this policy on our website. It is your responsibility to check our policy each time before you access our website for any changes.