

ENCORE VENTURES LLP

Privacy Notice

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KEY SUMMARY

We process your data in order to provide fund management services to you, and for no other purpose.

The Custodian, who hold your money and share certificates, plays an important role in this relationship as they pass information from your application form to us and they carry out anti-money laundering checks. We liaise with them to make your investments.

We will treat information and instructions from your independent financial advisor as if they come from you unless you instruct us otherwise. For applications which have been submitted through an independent financial adviser we may share information with that firm for administrative purposes. It is important to tell us if you change your advisor. You can also ask us to accept instructions from, and provide information in relation to your account to, specific individuals, for example, your spouse or accountant.

This notice explains what data we process, why, how it is legal and your rights.

ABOUT US and THIS NOTICE



This Privacy Notice is provided by Encore Ventures LLP ("**Encore Ventures**" or "**we**" or "**our**") who are a '**controller**' for the purposes of the General Data Protection Regulation (EU) 2016/679.

We take your privacy very seriously. We ask that you read this Privacy Notice carefully as it contains important information about our **processing** and your rights.

How to contact us

If you would like to get in touch with us in relation to this Privacy Notice please contact us at the details below.

- For routine account matters and to inform us, for example, of a change of address or a change of IFA:
 - Email: eis@draperesprit.com (*This is our preferred mode of contact)
 - Postal address: Encore Ventures LLP, **20 Garrick Street, London, WC2E 9BT**
 - Telephone number: **0207 931 8800**

- For any other matters, to contact our Compliance Officer:
 - Name: Stuart Chapman
 - Address: **20 Garrick Street, London, WC2E 9BT**
 - Telephone number: **0207 931 8800**
 - Email: gdpr@draperesprit.com

Changes to this Privacy Notice

The Privacy Notice will be provided to you when your application is accepted and can always be found on our website at www.draperesprit.com/investors/eis .

We may change this Privacy Notice from time to time. We will alert you on our website when changes are made.

USEFUL WORDS AND PHRASES



Please familiarise yourself with the following words and phrases (used in **bold**) as they have particular meanings in the **Data Protection Laws** and are used throughout this Privacy Notice:

Term	Definition
controller	This means any person who determines the purposes for which, and the manner in which, any personal data is processed .
Data Protection Laws	This means the laws which govern the handling of personal data . This includes the General Data Protection Regulation (EU) 2016/679 and any other national laws implementing that Regulation or related to data protection.
data subject	The person to whom the personal data relates.
Draper Esprit	This means Draper Esprit Plc which has company number 09799594 and has its registered office at 20 Garrick Street, London, WC2E 9BT, and members of its group of companies. A wholly owned subsidiary of Draper Esprit Plc, called Esprit Capital Partners LLP, is a member of Encore Ventures LLP. Encore Ventures and Draper Esprit share the same offices, and collaborate with one another when making investments. Draper Esprit provides certain services to Encore Ventures and certain staff members provide services for both entities.
ICO	This means the UK Information Commissioner's Office which is responsible for implementing, overseeing and enforcing the Data Protection Laws .
personal data	<p>This means any information from which a <u>living individual</u> can be identified.</p> <p>This will include information such as telephone numbers, names, addresses, e-mail addresses, photographs, voice recordings. It will also include expressions of opinion and indications of intentions about data subjects (and their own expressions of opinion/intentions).</p> <p>It will also cover information which on its own does not identify someone but which would identify them if put together with other information which we have or are likely to have in the future.</p>

Term	Definition
processing	<p>This covers virtually anything anyone can do with personal data, including:</p> <ul style="list-style-type: none"> • obtaining, recording, retrieving, consulting or holding it; • organising, adapting or altering it; • disclosing, disseminating or otherwise making it available; and • aligning, blocking, erasing or destroying it.
processor	<p>This means any person who processes the personal data on behalf of the controller.</p>
special categories of data	<p>This means any information relating to:</p> <ul style="list-style-type: none"> • racial or ethnic origin; • political opinions; • religious beliefs or beliefs of a similar nature; • trade union membership; • physical or mental health or condition; • sexual life; and • genetic data or biometric data for the purpose of uniquely identifying you. <p>We also include offences or alleged offences or information relating to any offences committed or allegedly committed in this category.</p>
Custodian	<p>The FCA authorised firm that we appoint as custodian to our funds (and you have a contract with) to act as custodian to handle your money and hold share certificates for your investments.</p>

WHAT INFORMATION DO WE COLLECT?



➤ **Personal data provided by you**

When you apply for our services, we need to collect:

- your name
- address
- phone number
- email address
- date of birth
- town of birth
- country of birth
- UK National Insurance number
- information to support an assessment of “appropriateness” as required by FCA regulation, for which we collect:
 - Information on employment and earnings (expressed as an indicative range, not a precise figure) and the source of investment funds; and
 - Investment experience

When we need to transfer funds to you as provided in the Application Pack (e.g. when any investment is realised and we need to distribute cash proceeds or we decide to return to you any surplus cash based on our conclusion that it cannot be properly invested for the investor, or at the end of the fund life) we will ask you to provide your bank details to the Custodian, who may share this with us, so that payments can be made.

We also collect other **personal data** when you contact us, send feedback, or raise any complaint.

➤ **Special Categories of Data provided by you**

We do not collect any **special categories of data** about you.

➤ **Personal information provided by third parties**

Custodian: We will receive information about you (as set out above) from **the Custodian** when you complete your Application Form. **The Custodian** will carry out anti-money laundering checks which are required by law and tell us whether or not you have satisfied the tests. If you do not satisfy the tests, we will not be able to approve your application.

IFA: Your independent financial advisor will carry out anti-money laundering checks which are required by law and provide us with the information used to carry out the checks (e.g. proof of

name and address, driving licence and passport) and the result of the checks. If you do not satisfy the checks, we will not be able to approve your application. Your independent financial advisor may also provide us with information on your behalf. Where you have nominated an independent financial advisor on your Application Form, we will accept information and instructions from that advisor and/or their firm as if they came from you, and may share information relating to you and your account and your investments for administration and reporting purposes, unless you instruct us otherwise. If you change your advisor, you must tell us (see 'How to contact us' section above) otherwise we will not know that the advisor is no longer authorised by you.

Other nominated person: Your nominated person (other than your IFA) may also provide us with information on your behalf. Where you have nominated such person on your Application Form, we will accept information and instructions from that person as if they came from you and we may share information relating to you and your account and your investments. If you change your nominated person, you must tell us (see 'How to contact us' section above) otherwise we will not that the nominated person is no longer authorised by you.

WHY DO WE PROCESS YOUR PERSONAL DATA?



We use your **personal data** for the following purposes listed in this section. We are allowed to do so on certain legal bases (please see section 'How is processing your data lawful' for further detail).

We collect your information to:

- **Process** and assist with your registration for our services;
- Respond to your enquiries;
- Carry out checks to ensure that the investment you are requesting appears 'appropriate' (for the purposes of Financial Conduct Authority Conduct of Business Rules) given what we know about you. (Note this is not the same as the 'suitability' check which your independent financial advisor will carry out for the purposes of Financial Conduct Authority Conduct of Business Rules);
- Improve our services offered to you by listening to any feedback or complaints you may have and analysing your usage of the services;
- Pass your details to third parties when you authorise us to, such as to **the Custodian** or your independent financial advisor; and
- For the purposes of enabling EIS Relief. This may include sharing your details with companies in which the fund acquires shares on your behalf, advisors to those companies or Encore Ventures assisting in these matters, and HMRC.

We may send you information by email about other products and services which may be of interest to you. You can opt out from receiving these communications at any time. See 'Your Rights' for further information.

HOW IS PROCESSING YOUR PERSONAL DATA LAWFUL?



We are allowed to **process** your **personal data** for the following reasons and on the following legal basis:

➤ **Contract**

It is necessary for the performance of the contract you have agreed to enter with us for our services. If you do not provide your **personal data** to us, we will not be able to provide you with our services as we could not purchase shares for you without knowing your identity.

➤ **Legal obligation**

We are subject to legal obligations to **process** your data for the purposes of complying with applicable accounting and financial rules and to make mandatory disclosures to law enforcement.

WHO WILL HAVE ACCESS TO YOUR PERSONAL DATA?



We may disclose your **personal data** to:

Who information is shared with	Personal Data
<p>Our IT related service providers who host and maintain our systems. Some of our IT is provided by Softwerx, Concise CRM and Microsoft.</p> <p>If you would like to know the names of our service providers, please contact us using the details at the start of this Privacy Notice.</p>	<p>Information provided by you at application for our services and ongoing information relating to your shareholdings and account with the custodian.</p>
<p>The company in which you have invested (which may be based outside of the European Union) where they require this information to apply for tax relief.</p>	<p>Name, address, number of shares, value of shares and prior shareholdings in that company.</p>
<p>Draper Esprit, for the purposes of making investments and applying for tax relief, and through the shared services arrangements between Encore Ventures and Draper Esprit.</p>	<p>Information provided by you at application for our services and ongoing information relating to your shareholdings and account with the custodian.</p>

Transfers of your personal data outside the EEA

We need to transfer your **personal data** to a country outside the European Economic Area where you have invested in a company that is registered overseas. This is permitted as it is necessary to perform our contract with you and make the investment.

How we keep your data secure

We strive to implement appropriate technical and organisational measures in order to protect your **personal data** against accidental or unlawful destruction, accidental loss or alteration, unauthorised disclosure or access and any other unlawful forms of **processing**. We aim to ensure that the level of security and the measures adopted to protect your **personal data** are appropriate for the risks

presented by the nature and use of your **personal data**. We follow recognised industry practices for protecting our IT environment and physical facilities.

If you have any particular concerns about your information, please contact us (see 'How to contact us?' above).

WHEN WILL WE DELETE YOUR DATA?



We will retain all of your data until 6 years after the fund in which you invested is closed or your investment is returned.

YOUR RIGHTS



As a **data subject**, you have the following rights under the **Data Protection Laws**:

- the right of access to **personal data** relating to you;
- the right to correct any mistakes in your information;
- the right to ask us to stop contacting you with direct marketing;
- rights in relation to automated decision making;
- the right to prevent your **personal data** being **processed**;
- the right to have your **personal data** ported to another **controller** (e.g. if you decide to contract with a different service provider); and
- the right to erasure.

These rights are explained in more detail below, but if you have any comments, concerns or complaints about the use of your **personal data** by us, please contact us (please refer to section "How to contact us").

When you contact us to exercise your rights, you will need to let us have enough information to identify you (e.g. account number and date of birth etc).

We will respond to any rights that you exercise within a month of receiving your request, unless the request is particularly complex, in which case we will respond within three months.

Please be aware that there are exceptions and exemptions that apply to some of the rights which we will apply in accordance with the Data Protection Laws.

➤ **Right to access personal data relating to you**

You may ask to see what **personal data** we hold about you and be provided with:

- a copy;
- details of the purpose for which it is being or is to be **processed**;
- details of the recipients or classes of recipients to whom it is or may be disclosed, including if they are overseas and what protections are used for those overseas transfers;
- the period for which it is held (or the criteria we use to determine how long it is held);
- any information available about the source of that data; and
- whether we carry out an automated decision-making, or profiling, and where we do information about the logic involved and the envisaged outcome or consequences of that decision or profiling.

To help us find the information easily, please provide us as much information as possible about

the type of information you would like to see.

➤ **Right to correct any mistakes in your information**

You can require us to correct any mistakes in your information which we hold free of charge. If you would like to do this, please:

- email or write to us (see "How to contact us"); and
- let us know the information that is incorrect and what it should be replaced with.

➤ **Right to ask us to stop contacting you with direct marketing**

You can ask us to stop contacting you by email with marketing materials. If you would like to do this, please:

- email or write to us (see "How to contact us"). Or you can also click on the 'unsubscribe' button at the bottom of any email. It may take up to a few business days for this to take place; and
- provide us with details of your preferred method of contact (for example, you may be happy for us to contact you by email but not by telephone).

➤ **Rights in relation to automated decision making**

We do not make any automated decisions about you so this right does not apply.

➤ **Right to prevent processing of personal data**

You may request that we stop **processing** your **personal data** temporarily if:

- you do not think that your data is accurate. We will start **processing** again once we have checked whether or not it is accurate;
- the **processing** is unlawful but you do not want us to erase your data;
- we no longer need the **personal data** for our **processing**, but you need the data to establish, exercise or defend legal claims; or
- you have objected to **processing** because you believe that your interests should override our legitimate interests.

➤ **Copies of your personal data (data portability)**

You may ask for an electronic copy of your **personal data** which we hold electronically and which we **process** when we have entered into a contract with you. You can also ask us to provide this directly to another party.

➤ **Right to erasure**

You can ask us to erase your **personal data** where:

- you do not believe that we need your data in order to **process** it for the purposes set out in this Privacy Notice;
- if you had given us consent to **process** your data, you withdraw that consent and we cannot otherwise legally **process** your data;
- you object to our **processing** and we do not have any legitimate interests that mean we can continue to **process** your data; or
- your data has been **processed** unlawfully or have not been erased when it should have been.

What will happen if your rights are breached?

You may be entitled to compensation for damage caused by contravention of the **Data Protection Laws**.

Complaints to the regulator

It is important that you ensure you have read this Privacy Notice - and if you do not think that we have **processed** your data in accordance with this notice - you should let us know as soon as possible. Similarly, you may complain to the **ICO**. Information about how to do this is available on its website at www.ico.org.uk.