

# Privacy Policy

## Apis Partners LLP

### Apis and data privacy

Apis Partners LLP, and its affiliated companies and partnerships worldwide ("Apis") is committed to protecting and respecting the privacy of our website visitors, visitors to our premises, suppliers, consultants, professional advisers, investors, potential investors and other business partners.

This privacy policy sets out the basis on which we will process any personal information that we may collect about you as a visitor to our website or premises, or as a contact at one of our suppliers, consultants, professional advisers, investors, potential investors and other business partners. We therefore ask you to read this privacy policy carefully.

### What personal information do we collect from you?

We may collect and process the following personal information about you:

- **Information that you or others give us:** This is information about you that you give to us by filling in forms on our website (or other forms that we ask you to complete), giving us a business card (or similar), corresponding with us by telephone, post, email or otherwise, or meeting with us. We may also receive information from third parties who collect personal information from you and pass it on to us, for example where we conduct customer due diligence checks or anti-money laundering checks on investors or prospective investors in respect of funds managed by Apis, or in respect of management teams in relation to a prospective transaction, as well as from publicly available and accessible directories and sources, publicly available registers, tax authorities, governmental and competent regulatory authorities to whom we have regulatory obligations, credit agencies, fraud prevention and detection agencies and other similar organisations. Such information may include, for example, your name, date of birth, gender, address, email address and telephone number, information about your business relationship with Apis, information about your professional role, job title, employer organisation, your CV, previous employment history and professional activities, background and interests, bank account details and VAT (or equivalent) number, information relating to your financial status and dealings, investment experience, risk tolerance and transaction history, investment activity, references provided by third parties and results of other due diligence enquiries. We may also hold special categories of more sensitive personal data such as your race or ethnicity, information about your health including any medical condition and sickness records.
- **Information that our website and other systems collect about you:**
  - If you visit our website it will automatically collect some information about you and your visit, including the Internet protocol (IP) address used to connect your device to the Internet and some other information such as your browser type and version and the pages on our site that you visit. Our website may also download "cookies" to your device – this is described in our separate [cookie statement](#).
  - If you exchange emails, telephone conversations or other electronic communications with our employees and other staff members, our information

technology systems will record details of those conversations, sometimes including their content.

- Some of our premises have closed circuit TV systems which may record you if you visit our premises, for security and safety purposes.

### **How will we use your information?**

We may use your information for the following purposes:

- to operate, manage, develop and promote our business and, in particular, our relationship with the organisation you represent (if any) and related transactions – this includes, for example, marketing and billing / payment purposes;
- to operate, administer and improve our website and premises and other aspects of the way in which we conduct our operations;
- to protect our business from fraud, money-laundering, breach of confidence, theft of proprietary materials and other financial or business crimes;
- to comply with our legal and regulatory obligations, including tax reporting and assessing and managing risk, and to bring and defend legal claims;
- to manage and maintain records of services or advice we have received, and to commission further services;
- to seek and obtain advice from our professional advisors;
- to invite you to presentations and events and to organise meetings between you and Apis representatives;
- to provide you with information, products and services that may be of interest to you in the context of our business and investment-related activities, for example when raising investments into our funds and in connection with future fundraising activities;
- to send direct marketing communications to you;
- to assess potential transactions;
- to maintain records of investments and administering any transactions that one of our funds enters into;
- to assess your suitability for involvement in a transaction or as an investor in one of our funds, including verifying your identity and source of funds, undertaking due diligence and on-boarding checks, terrorist financing and anti-money laundering checks;
- to carry out our contract and fulfil our contractual obligations with you;
- to carry out audit checks;
- to maintain statutory registers

We may from time to time review information about you held in our systems – including the contents of and other information related to your email and other communications with us – for compliance and business-protection purposes as described above. This may include reviews for the purposes of disclosure of information relevant to litigation and/or reviews of records relevant to internal or external regulatory or criminal investigations. To the extent permitted by applicable law these reviews will be conducted in a reasonable and proportionate way and approved at an appropriate level of management. They may ultimately involve disclosure of your information to governmental agencies and litigation counterparties as described below. Your emails and other communications may also occasionally be accessed by persons other than the member of staff with whom they are exchanged for ordinary business management purposes (for example, where necessary when a staff member is out of the office or has left Apis).

We will only process your personal information as necessary so that we can pursue the purposes described above, and then only where we have concluded that our processing does not prejudice you or your privacy in a way that would override our legitimate interest in pursuing those purposes. In exceptional circumstances we may also be required by law to disclose or otherwise process your personal information. We will tell you, when we ask you to provide information about yourself, if provision of the requested information is necessary for compliance with a legal obligation or, on the other hand, if it is purely voluntary and there will be no implications if you decline to provide the information. Otherwise you should assume that we need the information for our business or compliance purposes (as described above). Some of the personal data we request is necessary for us to perform our contract with you and if you do not wish to provide us with this personal data, it will affect our ability to provide our services to you. If you are uncertain as to Apis' need for information that we request from you, please contact the Apis representative asking for the information, or contact us (see below), with your query.

### **Disclosure and international transfer of your information**

We may disclose personal information about you, where reasonably necessary for the various purposes set out above:

- to the other members of the Apis group of companies;
- to your colleagues within the organisation that you represent;
- to service providers who host our website or other information technology systems or otherwise hold or process your information on our behalf, under strict conditions of confidentiality and security, for example to our fund administrators, depositories and custodians;
- to our lawyers, auditors and other professional advisors, business partners, suppliers and sub-contractors for the performance of any contract we enter into with them or you;
- to a person who takes over our business and assets, or relevant parts of them; or
- in exceptional circumstances:
  - to competent regulatory, prosecuting and other governmental agencies, or litigation counterparties, in any country or territory; or

- where we are required by law to disclose.

These disclosures may involve transferring your personal information overseas. If you are dealing with us within the European Economic Area (or the UK, after it has left the European Economic Area), you should be aware that this may include transfers to countries outside the European Economic Area / UK, which do not have similarly strict data privacy laws. In those cases, where we transfer personal data to other members of the Apis group or our service providers, we will ensure that our arrangements with them are governed by data transfer agreements, designed to ensure that your personal information is protected, on terms approved for this purpose by the European Commission. Please contact us (see below) if you would like to know more about these agreement, or receive a copy of them.

### **How long do we keep your personal information?**

We will keep your personal data for as long as it is required by us for our legitimate business purposes, to perform our contractual obligations, or where longer, such longer period as is required by law or regulatory obligations which apply to us.

We will generally retain your data in accordance with our records management policies, which provide that we will keep all records for at least five years. In the context of your investment in the Fund, we will generally retain information about you throughout the life cycle of the Fund and its investments. To determine the appropriate retention period for personal data, we consider 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 and whether we can achieve those purposes through other means, and the applicable legal requirements.

Please note that we may retain some information about you after your relationship with us ends. We may also retain some information about you even when we know that you have left the organisation that you represent, so that we can maintain a continuous relationship with you if and when we are in contact with you again, representing a different organisation.

As a general principle, we do not retain your personal data for longer than we need it.

### **Grounds for Processing**

We do not generally rely on obtaining your consent to process your personal data. If we do, you have the right to withdraw your consent at any time. If you wish to exercise this right, please contact us as set out below.

In order to process your data lawfully, we generally rely on one or more of the following legal grounds:

- our legitimate interests in running our business. For example, if we enter into a transaction involving you, whether it completes or not, it may be necessary for us to process your personal information for the purpose of performing that contract and/or for complying with our legal and regulatory obligations;
- our compliance with a legal obligation to which Apis 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 data is necessary for the performance of that contract.

### **What are your rights?**

You may have a right of access to the personal information that we hold about you, and to some related information, under data protection law. You can also require any incomplete or inaccurate personal information to be corrected or deleted. You can object to our use of your personal information for direct marketing purposes at any time and you may have the right to object to our processing of some or all of your personal information (and require it to be deleted) in some other circumstances. From 25 May 2018, you also have the right in some circumstances to request for us to "port" your personal data in a portable, re-usable format to other organisations (where this is possible).

If you wish to exercise any of these rights, please contact us as set out below. You can also lodge a complaint about our processing of your personal information with the Information Commissioner's Office in the UK.

### **Contact us**

We welcome questions, comments and requests regarding this privacy policy and our processing of personal information. Please send them to the Compliance Officer, Apis Partners LLP, Seventh Floor, 8 Lancelot Place, London SW7 1DR, or email us at [dataprotection@apis.pe](mailto:dataprotection@apis.pe).

### **Changes to this policy**

We keep this privacy policy under regular review. Any changes we make to this privacy policy in the future will be posted to our website (at [www.apis.pe](http://www.apis.pe)) and also available if you contact us. Please check back frequently to see any changes.

**Last updated: August 20<sup>th</sup>, 2020**