

WOODSIDE CORPORATE SERVICES LIMITED – PRIVACY POLICY

1. About us and this privacy policy

Woodside Corporate Services Limited (“**we**” or “**us**”) is an FCA authorised and regulated provider of custody, receiving agent and nominee services in respect of EIS, SEIS and other investment funds and arrangements (“**Investments**”).

Fund managers, crowdfunding platforms, fund advisers and/or other investment firms (each an “**Investment Firm**”) engage our services from time to time in relation to Investments they advise on, or manage on behalf of investors.

We collect and process certain personal data during our relationship with investors and Investment Firms. If you are an individual whose personal data we collect and process in the course of or in connection with our services (“**you**” or “**your**”), this privacy policy provides information on how we collect and process your personal data and what steps we take to protect the privacy and security of your personal data, in accordance with the applicable data protection laws, including the General Data Protection Regulation (**GDPR**).

If you are an investor, you should read this privacy policy together with our terms and conditions and any privacy notices that may be provided in the relevant investment documentation. Please contact us if you wish to receive a copy of our terms and conditions.

2. Our role

Our role is to provide administrative support services in relation to Investments, by providing custodian, receiving agent and/or nominee services (as applicable). To the extent we fulfil our duties as a custodian, receiving agent and/or nominee, we will be acting on the instructions received from the relevant Investment Firm, and will not take any independent decisions about any Investments. This means that when we process investors’ personal information pursuant to instructions received from an Investment Firm, we will be acting as a data processor, processing the investors’ personal data for and on behalf of the Investment Firm, who will be the data controller in respect of such processing activities.

However, in certain circumstances we may also be a data controller in respect of investors’ personal data:

- When we process investors’ personal information to comply with our legal and regulatory obligations, for example to carry out our “know your customer” checks (otherwise known as “AML checks”), to comply with the “client money” rules of the FCA Handbook, to comply with our record keeping obligations;
- When, in exceptional circumstances, we accept instructions in respect of Investments directly from an investor (in accordance with our investor terms and conditions);
- When we process investors’ personal information to comply with our reporting obligations, for example under the Foreign Account Tax Compliance Act (FATCA), the Crown Dependencies & Overseas Territories (CDOTs) and the Common Reporting Standards (CRS).

If you are an individual working for an Investment Firm, or otherwise are in contact with us in connection with our business, we will collect and process certain personal information about you, such as your name and contact details, in order to manage our relationship with you and communicate with you in relation to our services. In such cases we are acting as a data controller in respect of any such personal information.

3. Lawful basis and purposes of processing of your personal information

We will only use your personal information when the law allows us to, i.e. when it is necessary to:

- perform our contractual obligations towards an investor and/or the Investment Firm;
- comply with our legal and regulatory obligations;
- pursue our legitimate interests (e.g. conducting our business in an efficient, compliant and profitable manner), and your interests and fundamental rights do not override these interests. It may also become necessary to process your personal data for legitimate interest of a third party, such as the relevant Investment Firm.

We collect information about you so that we can:

- identify you and manage the register of your money and/or investments (as applicable);
- process instructions in respect of Investments;
- detect and prevent fraud;
- conduct “know your customer” checks;
- liaise with Investment Firms, our suppliers and group companies;
- administer our contract with you and/or with the Investment Firm (as applicable);
- improve our services;
- manage our business, including for accounting and auditing purposes;
- conduct our regular group reporting activities on the performance of our company, including in the context of a business reorganisation or group restructure;
- maintain our IT systems and manage hosting of our data;
- deal with legal disputes involving you, any relevant Investment Firms or our suppliers; and
- comply with our reporting obligations.

Some of the above grounds and purposes for processing will overlap and there may be several grounds which justify our use of your personal information.

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

4. What information we collect?

Personal information provided by you or an Investment Firm

If you are an investor, we collect personal information about you (such as your name, address, telephone number, email address, payment card details or bank account details and information about your investments, information about your tax residency, occupation and source of wealth) when we receive your investment application form and/or instructions in respect of your investments. We also collect personal information when you or your Investment Firm contact us in connection with our services. We may monitor and record any such communications (such as telephone conversations and emails) for the purpose of our record keeping and compliance obligations.

If you are an individual representing an Investment Firm or other business contact, we will collect and store your name, your contact and other information relevant to our relationship, for example your role and name of the business in which you are involved.

Personal information provided by third parties

Occasionally we may receive information about you from other sources (such as credit reference agencies), which we will add to the information we already hold about you in order to help us comply with our regulatory obligations. We may also receive certain personal information about you from Investment Firms and other business contacts.

In certain circumstances we may be required to carry out enhanced due diligence checks to comply with our obligations under the Money Laundering Regulations 2017. These enhanced checks may reveal information about criminal convictions or information about an individual's political opinions and associations and/or other sensitive personal data. We will only collect and process such information to the extent necessary to comply with our regulatory obligations and in accordance with the applicable data protection laws.

5. Will we disclose your personal information to anyone?

We may need to share your personal information with third parties such as:

- other companies within our group;
- our agents and service providers;
- credit reference agents;
- any relevant Investment Firms;

- our regulators, including the Financial Conduct Authority;
- law enforcement agencies in connection with any investigation to help prevent unlawful activity; and
- in the context of the possible sale or restructuring of our business.

We require third parties to respect the security of your data and to treat it in accordance with the law. All our third-party service providers and other entities in the group are required to take appropriate security measures to protect your personal information.

We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

6. Keeping your data secure

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

While we will use all reasonable efforts to safeguard your personal data, you acknowledge that the use of the internet is not entirely secure and for this reason we cannot guarantee the security or integrity of any personal data that are transferred via the internet. If you have any particular concerns about your information, please contact us (see 'How can you contact us?' below).

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

7. Transfers of your information out of the EEA

We may need to transfer your personal data outside the European Economic Area (**EEA**), for example if one of our suppliers or group companies is located outside the EEA. We will ensure that any transfer of your data will be subject to appropriate safeguards, such as for example a European Commission approved contract (if appropriate) that will ensure you have appropriate remedies in the unlikely event of a security breach.

8. Data retention

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. 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.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you. Once you are no longer our customer, we will retain and securely destroy your personal information in accordance with applicable laws and regulations.

9. Rights and duties

Your duty to inform us of changes

It is important that the personal information we hold about you is accurate and current. Please let your Investment Firm (if you are an investor) and/or us know if your personal information changes during your relationship with us.

Your rights in connection with personal information

Under certain circumstances, by law you have the right to:

- **Request access** to your personal information (commonly known as a “data subject access request”). This enables you to receive a confirmation from us as to whether we process any of your personal information or not, and if this is the case, to receive a copy of such personal information and to check that we are lawfully processing it.
- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal information (often referred to as “the right to be forgotten”). This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground.
- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it, or if we no longer need your data for our legitimate interests but we need to hold some of it for the purpose of legal proceedings.
- **Request the transfer** of your personal information to another party.

If you would like to exercise any of the above rights, please:

- email, call or write to us (see paragraph 10 below);
- let us have proof of your identity and address (a copy of your driving licence or passport and a recent utility or credit card bill). This is to allow us to verify your identity and prevent disclosure to unauthorised third parties; and

- let us know the details of your request, for example by specifying the personal data you want to access, the information that is incorrect and the information with which it should be replaced.

Please note that if you request erasure, object to our processing of your personal data or request the restriction of our processing of your personal data we may not be able to provide our services in relation to your investments.

10. Contact us or the ICO

Please contact us if you have any questions about this privacy policy or the information we hold about you.

If you wish to contact us, please send an email to info@woodsidesecretaries.co.uk or write to us at 4th Floor 50 Mark Lane, London, EC3R 7QR or call us on +44 (0)203 216 2000.

You can also contact the Information Commissioner's Office on 0303 123 1113.

11. Changes to the privacy policy

We may change this privacy policy from time to time. You can ask your Investment Firm (if you are an investor) or contact us if you wish to receive a copy of this policy occasionally to ensure you are aware of the most recent version.