

INVERLEITH LLP

PRIVACY NOTICE

CLIENTS, THIRD PARTIES, WEBSITE USERS AND INVESTMENT CONTACTS

1. Introduction

Inverleith LLP (“Inverleith” or “we”) is committed to protecting the security and privacy of EU data subjects’ (“you”) personal data when processing the same. Inverleith endeavors to ensure that any personal data we collect about you will, where relevant, be held and processed in accordance with the European General Data Protection Regulation (“GDPR”). The terms ‘personal data’, ‘data controller’ and ‘processing’ have the meanings given to them in GDPR (which can be accessed [here](#)), unless otherwise indicated.

2. Scope

This Privacy Notice demonstrates how we handle the personal data you provide to us, or which we collect about you, in the following ways (your “Data”):

- (a) by you submitting Data to us through our website www.inverleith.com or from what we learn about you from your visit to our website;
- (b) by you or a third party (such as your employer) submitting Data to us in the course of us providing services to you;
- (c) by you submitting Data to us where we are seeking to obtain services from you as a supplier/service provider;
- (d) as a result of us using your Data to contact you about potential investment opportunities and other fund-raising services.

3. Identity and contact details of data controller

3.1. For the purposes of GDPR, Inverleith LLP will be the controller of your Data.

3.2. If you are not clear about this point or if you have any queries regarding this policy or complaints about our use of your Data, please contact us at sharon@inverleith.com or feel free to contact any of our partners directly. If you would rather contact us by post, please use the following address:

Inverleith LLP
43 Melville Street
Edinburgh
EH3 7JF

FAO Data Processing

4. Data protection representative

4.1. Contact details for Inverleith LLP are set out in paragraph 3 above.

5. What we use your Data for

The table in Schedule 1 to this Privacy Notice sets out the categories of your Data that we hold, the purposes for which we may process your Data and the legal basis for the processing.

6. Data security

6.1. We have put in place appropriate security measures to prevent your Data from being accidentally lost, used or accessed in an unauthorized way, altered or disclosed. In addition, we limit access to your Data to those individuals who have a business need to know.

6.2. 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. Who we share your Data with

7.1. We may on occasion be required to share your Data with the following categories of recipients:

- (a) third parties who provide services to us or on our behalf
- (b) professional services provider contacts where this is necessary in connection with the performance by us of services to our clients;
- (c) in other cases:
 - (i) where we are required to do so by law or enforceable request by a regulatory body;
 - (ii) where it is necessary for the purpose of, or in connection with legal proceedings or in order to exercise or defend legal rights; or
 - (iii) if we sell our business, go out of business, or merge with another business.

8. International Transfers

8.1. In certain circumstances, we may transfer your Data to countries outside the EEA, which may not adhere to the same levels of data protection to which countries within the EEA are subject. Any such transfers are, at all times, made in accordance with the GDPR.

9. Retention Period

9.1. We will only retain your Data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, tax, regulatory or reporting requirements. To determine the appropriate retention period for your Data, we consider the amount, nature, and sensitivity of your Data, the potential risk of harm from unauthorised use or disclosure of your Data, the purposes for which we process your Data and whether we can achieve those purposes through other means, and the applicable legal requirements

9.2. As a general rule this means that your Data will be stored for a maximum period of 7 years from the date on which our relationship with you ends, after which time it will be put 'beyond use' if it is no longer required for the lawful purpose(s) for which it was obtained.

10. Your rights in relation to your Data

10.1. Under the GDPR, you have the following rights in relation to how we process your Data:

- (a) right to request access: you may obtain confirmation from us as to whether or not your Data is being processed and, where that is the case, access to your Data;
- (b) right to rectification and erasure: you have the right to obtain rectification of inaccurate personal Data we hold concerning you and to obtain the erasure of your Data without undue delay in certain circumstances;
- (c) right to restriction of processing: you may require us to restrict the processing we carry out on your Data in certain circumstances;
- (d) right to data portability: you have the right to receive your Data in a structured, commonly used and machine-readable format;

right to withdraw consent and object to processing: where you have provided your consent to us processing your Data, you have the right to withdraw your consent at any time. Additionally, where we are relying on legitimate interests to process your Data you have the right to object to such processing; and

(e) right to lodge a complaint: you may lodge a complaint with any supervisory authority in the EU. The supervisory authority for the United Kingdom is the Information Commissioner's Office.

10.2. For further information on your rights, please see the Information Commissioner's website [here](#).

10.3. Please note that, in circumstances where you are seeking to exercise your rights as a data subject, we may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that your Data is not disclosed to any person who does not have a right to receive it.

11. Other Websites

11.1 Our website contains links to other websites. This privacy policy only applies to this website, so when you access other websites via our links you should read their own privacy policies.

12. Additional Information

12.1 We keep our data protection policy (including this Privacy Notice) under constant review and may change it from time to time to reflect our practices or to remain compliant with relevant legislation. We will notify you of any material changes to our Privacy Notice at which point you will be given the option to request that we cease processing your Data.