



Introduction

This privacy notice is issued by Goldenpeak Private Equity Partners LLP (**Goldenpeak**). Goldenpeak is registered at Companies House with registration number OC457973. Goldenpeak is registered with the Information Commissioners' Office (**ICO**) with registration number CSN0797876. From an FCA perspective, Goldenpeak is an appointed representative of Langham Hall Fund Management LLP, with a firm reference number of 1043254.

Our contact details are:

- 7 Sollershott West, Letchworth, Herts, SG6 3PU
- 07855527226

Goldenpeak respects your privacy and is committed to protecting it. Please read this privacy notice carefully as it gives you information about who we are, what personal information we collect, why we collect it, how you can access this and your rights in relation to it.

This privacy notice may relate to and be applicable in any of the following circumstances:

- your use of our website, including submitting an enquiry on the website form;
- any dealings that you have in connection with the investment services offered by Goldenpeak.

Key terms

In this privacy notice reference to **you** is to:

1. people to whom Goldenpeak will send marketing and other similar communications; or
2. the directors, owners, employees, agents or independent contractors of any incorporated entity (**Corporate Entity**) who have approached Goldenpeak in a business to business capacity on behalf of the Corporate Entity.

For the avoidance of doubt reference to:

- **you** does not refer to a Corporate Entity but as the context allows the relevant personnel of the Corporate Entity or Introducer.
- **personal information** means any information relating to an identified or identifiable individual.
- **special category data** means personal information revealing racial or ethnic origin, political opinions, religious beliefs, philosophical beliefs or trade union membership, genetic data, biometric data (where used for identification purposes) and personal information concerning health, sex life or sexual orientation.

How your personal information is collected

We collect personal information directly from you—in person, by telephone, text or email and via our website. We may also receive relevant personal data from Corporate Entities with which we work who employ you.

We may receive further information from publicly accessible sources, e.g. Companies House, HM Land Registry, credit reference agencies or other credit data providers and other customer due diligence providers.

We may receive personal information via our website — we use cookies and similar technologies on our website.

How and why we use your personal information

Under data protection law, we can only use your personal information if we have a proper reason. The reasons include:

- you have given consent — where we need your consent, we will ask for it separately of this privacy notice and you can withdraw consent at any time;
- to comply with our legal and regulatory obligations;
- to fulfil our contract with you or take steps at your request before entering into a contract; or
- for our legitimate interests* or those of a third party.
-

*A legitimate interest is when we have a business or commercial reason to use your personal information, so long as this is not overridden by your own rights and interests. You have the right to object to processing based on legitimate interests. We must then stop the processing unless we can demonstrate compelling legitimate grounds which override your interests, rights and freedoms or that the processing is required to establish, exercise or defend legal claims.

The basis of our processing of personal data is legitimate interest or legal obligation.

Legitimate interest - where we work with Corporate Entities who are businesses we are investing in or our network. We have to process the personal data of the relevant personnel to deal with those entities and this processing is sufficiently unintrusive to satisfy the legitimate interest test.

Legitimate interest - when we communicate with our contact base whether this is promotional or seeking / furthering opportunities the lawful basis of this processing is legitimate interest. We may use your personal information to form a view on what information we think you may want or need, or what information may be of interest to you.

We may use your personal information to send you updates (e.g. by email, text message, telephone, post or social media channels).

We will always treat your personal information with the utmost respect and never sell it to other organisations for marketing purposes. In all cases, you have the right to opt out of receiving marketing communications at any time by:

- contacting us using the contact details above; or
- using the 'unsubscribe' link in emails or 'STOP' number in texts

Legal Obligation – the process of investing is regulated and to the extent we have to do so we will review your personal data to ensure that any investment meets legal and regulatory requirements.

Cookies and Tracking

We use cookies and similar technologies on our website. For more information, please see our cookie policy.

Who we share your personal information with

We may share personal information with service providers that perform services on our behalf such as IT service providers, hosting providers and our advisers. All service providers have entered into legally binding agreements requiring them to use personal information only as necessary to perform services on our behalf and to implement appropriate data security and confidentiality obligations, in accordance with applicable law.

We may share your personal information with external parties that include, depending on the jurisdiction where you are domiciled:

- our and their external auditors, e.g. in relation to the audit of our or their accounts, in which case the recipient of the information will be bound by confidentiality obligations;
- our and their professional advisors (such as lawyers and other advisors), in which case the recipient of the information will be bound by confidentiality obligations;
- HM Revenue & Customs, regulators and other tax authorities;
- law enforcement and fraud prevention agencies;

We may also share your personal information if we choose to sell, transfer, or merge parts of our business. We will only share your information with third parties where they agree to keep it safe and we are satisfied they take appropriate measures to protect your personal information. We ensure all outsourcing providers operate under service agreements that are consistent with our legal and professional obligations.

If you would like more information about who we share our data with and why, please contact us.

Where your personal information will be held

Personal information may be held on our IT system, at our offices, with third party agencies, service providers, representatives and agents as described above (see 'Who we share your personal information with').

From time to time, some of these third parties may be based outside the UK but we will ensure that any transfer of personal data is lawful.

How long do we keep your personal information for?

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purpose of satisfying any legal, accounting or reporting requirements. To determine the appropriate retention period, we consider the amount, nature and sensitivity of the personal information, the purposes for which we process your personal information and whether we can achieve those purposes through other means and the applicable legal requirement.

Compliance / regulatory data will be retained for up to ten years. If we consider that there may be circumstances which may involve disclosing this data to a regulator or law enforcement organisation we will retain this data for longer.

Your rights

Subject to applicable law, you have the following rights which you can exercise:

- to request access to and be provided with a copy of your personal information;
- rectification by us of any mistakes in the personal information we maintain about you;
- the right to require us to delete your personal information, in certain situations;
- to request the restriction of the processing of your personal information;
- the right to receive the personal information you provided to us, in a structured, commonly used and machine-readable format and/or transmit that information to a third party—in certain situations
- to object to the processing of your personal information by us;
- the right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you; and
- the right to withdraw your consent to processing if you have provided consent.

We may request specific information from you to help us confirm your identity and your right to access, and to provide you with the personal information that we hold about you or make your requested changes. There are certain laws which may allow or require us to refuse to provide you with access to some or all of the personal information that we hold about you, or we may have destroyed, erased, or made your personal information anonymous in accordance with our record retention obligations and practices. If we cannot provide you with access to your personal information, we will inform you of the reasons why, subject to any legal or regulatory restrictions.

How to complain

If you are unhappy with how we have used your personal information, please let us know by contacting us using the information given above. You also have the right to complain to the regulator, the ICO, whose website is www.ico.org.uk.

