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## WEBSITE (PRIVACY POLICY)

Last Updated: 28 March 2021

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simple.Capital Partners Limited ("**simple.Capital()**") enables private and corporate investors to invest in early-stage, hyper-growth companies through democratised processes, affordable ticket sizes and diversified portfolios to manage investment risk. This Privacy Policy describes what information Simple.Capital() collects and how it is used, and applies to all services that Simple.Capital() offers and all persons that Simple.Capital() engages with. Throughout this Privacy Policy users of the services and other persons with whom we interact will be referred to as "you", and Simple.Capital() will be referred to as "we" or "us".

### 1. Information That We Collect

- 1.1. We collect information on you in the following ways, and treat all of this information as your "Personal Data":
  - 1.1.1. **Information you give us:** when you use www.simple.capital (the "**Website**"), we may ask you to provide certain personal information, such as your contact details, banking details, tax information, demographic information, employment and educational history and, in the case of companies seeking to raise capital through simple.Capital(), information about you in connection with your business. Much of this information enables us to comply with our legal obligations or fulfil our contractual arrangements with you and other parties, and sharing this information may be necessary for us to provide our services. Please note that, in the case of companies who provide us with customer data, it is your responsibility to ensure that you have the appropriate grounds to do so, and that this is done in a secure manner.
  - 1.1.2. **Information we get from your use of our services:** we may gather certain information about you, including details of your operating system, browser version, domain name and IP address, and the details of any website from which you accessed the Website. We may also collect your Personal Data when you interact with our employees.
  - 1.1.3. **Information from third parties or publicly available sources:** we may also collect your Personal Data (including, for example, contact information) from third parties or publicly available sources.

### 2. Data Protection Principles

- 2.1. simple.Capital() is committed to protecting the privacy and security of your Personal Data. Simple.Capital() is a "data controller", meaning that we are responsible for deciding how we hold and use your Personal Data. We will comply with data protection law, which says that Personal Data must be: (i) used lawfully, fairly and in a transparent way; (ii) collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes; (iii) relevant to the purposes we have told you about and limited only to those purposes; (iv) accurate and kept up to date; (v) kept only as long as necessary for the purposes we have told you about; and (vi) kept securely.

### 3. How We Use Information That We Collect

- 3.1. We use the Personal Data that we collect for the following purposes:
  - 3.1.1. to comply with legal or regulatory obligations, we may use your Personal Data: (i) to confirm your identity; (ii) if applicable, to conduct required anti-money laundering checks on you, and associated financial crime and fraud monitoring, in connection with transactions you may conduct through the Website; (iii) in the case of investors, to confirm that you are eligible to make investments in accordance with any applicable legislation; (iv) to enable us to comply with any of our legal obligations relating to, for example, transaction recording, updates on your investment and fundraising activity on the Website, other compliance responsibilities, and reporting to regulators and governmental authorities.
  - 3.1.2. to carry out our obligations under our contracts with you or others, we may use your Personal Data: (i) to process and administer payments and investments; (ii) in the case of companies seeking capital and certain individuals connected to the fundraising business, to assess your suitability for fundraising, to verify and approve any disclosures you make, to facilitate investment transactions and exercise any rights that Simple.Capital() may have; (iii) in the case of investors, to facilitate any investments you may make, to exercise any rights you may

have in connection with those investments and to provide investee companies about your investments in their businesses; (iv) in the case of investors who have completed investments in investee companies, to provide those businesses with information to fulfil obligations to you, and ensure compliance with their corporate or regulatory requirements, such as tax and shareholder reporting; or (v) to provide you with information about your investments or payments you have made or have indicated an interest in making in simple.Capital().

- 3.1.3. We have a legitimate interest in ensuring that the Website operates effectively, and to do this we may use your Personal Data: (i) to monitor, improve and administer the Website and the services provided on the Website; (ii) to contact you; or (iii) to respond to any customer support or other enquiries requesting information. We may also intercept, record and/or monitor any communication(s) (including telephone calls or other electronic communications) between you and us. We may do so in order to resolve queries in the future and for the purposes of ensuring security, staff training and complying with any regulatory and legal responsibilities.
- 3.1.4. We also have a legitimate interest in communicating with you and others, facilitating communications between you and others, publicising our business, supporting industry research, and making sure that content we provide is effective, so we may use your Personal Data: (i) to enable us to conduct surveys and analysis, aggregate user profiles, identify other potential customers, or enable us or third party academics to conduct research; (ii) to publicise and promote our business, and to measure, understand, or improve the effectiveness of advertising we provide to you and others; (iii) in the case of individuals or businesses that have indicated an interest in simple.Capital(), to contact you to provide you with information about us and our products and services; (iv) to create and share informative content about our business or the industry in which we operate, including contacting you about documents we publish and new products and services we launch; and (v) to pass information in relation to products or services to the our investee companies.
- 3.2. In certain other circumstances we may seek your consent to use your Personal Data. In these case we will ask you to confirm your agreement to your Personal Data being processed for a specific purpose, either through the Website of by another means requested by us.

#### **4. Notifications**

- 4.1. Should you wish to unsubscribe from emails, you can use the 'unsubscribe' link on the emails we send you. Alternatively, please contact us at [info@simplecapitalpartners.com](mailto:info@simplecapitalpartners.com) if you no longer wish to receive our updates.

#### **5. Accuracy and Retention of Personal Data**

- 5.1. If you see or believe that any of the Personal Data we hold about you is inaccurate, please contact us in order for us to correct it.
- 5.2. It is your responsibility to ensure that any Personal Data you have provided to us remains accurate and to notify us (either through the Website or using the contact details below) if there are any changes in your Personal Data.
- 5.3. We will retain your Personal Data to fulfil the purposes outlined in this Privacy Policy as long as you are a customer or client of simple.Capital() platform, and for at least six years after that to comply with our legal and regulatory recordkeeping obligations.

#### **6. Information That We Share**

- 6.1. Any Personal Data that we collect will not be disclosed to any third parties by simple.Capital() and its affiliates, except where:
  - 6.1.1. We may disclose certain of your Personal Data to third party service providers solely in the course of their provision of services to simple.Capital(), and will take reasonable precautions to ensure that these service providers are obliged to keep your Personal Data secure and confidential, in compliance with relevant law. In some instances, your Personal Data may be transferred outside the United Kingdom; if this is the case we will take steps to ensure that the transfer is protected by safeguards provided under EU and UK law, such as the European Commission's standard contractual clauses.
  - 6.1.2. We may disclose certain of your Personal Data if we are required to do so by law, regulation or the order of court or other legitimate government body or arbitration panel.

## **7. Your Rights**

- 7.1. You may have the right to request the following actions regarding your Personal Data, which will be fulfilled in accordance with applicable data protection law:
- 7.1.1. If you wish to raise an objection to the processing of your Personal Data or wish it to be deleted you may do so by notifying us using the contact details below. It may be possible for us to restrict processing of your Personal Data, or to delete it so long as we can still comply with our legal, regulatory and contractual obligations.
- 7.1.2. If you wish to object to any marketing please notify us using the contact details below or, in the case of emails, you may also use the 'unsubscribe' feature which you can find on our emails. To ensure that we respect your request we may retain your contact details on a suppression list.
- 7.1.3. Where we have processed information with your consent, you may notify us using the contact details below to withdraw that consent at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your information conducted in reliance on lawful processing grounds other than consent.
- 7.1.4. If you would like to receive a portable copy of the Personal Data you have provided to us, please notify us using the contact details below. If you wish to see a copy of all of your Personal Data that we hold, please notify us using the contact details below. A request for a copy of your Personal Data will generally be fulfilled free of charge, but we may charge a reasonable fee if the request is manifestly unfounded, excessive, or repetitive, or if you request multiple copies of the same information.
- 7.1.5. If you have concerns about how we collect and use your data, please contact us.

## **8. Security of Your Personal Data**

- 8.1. We endeavour to take all reasonable steps to protect your Personal Data, including, where applicable, through the use of encryption technology. However, we cannot guarantee the security of any Personal Data you disclose online. In using the Website, you accept the inherent security implications of engaging in transactions online over the internet, and you agree that you will not hold us responsible for any breach of security unless we have been grossly negligent or in wilful default.

## **9. Revisions**

- 9.1. We may revise this Privacy Policy at any time by amending this page. You are expected to check this page from time to time to take notice of any changes we make, as they are binding on you. Some of the provisions contained in this Privacy Policy may also be superseded by provisions or notices published elsewhere on our Website.

## **10. Communicating With Us**

- 10.1. If you wish to contact us, or have any questions about this Privacy Policy, you can reach us at:

Legal Team  
simple.Capital Partners Limited  
Bank House, 81 St Judes Road  
Englefield Green, Surrey, TW20 0DF  
United Kingdom

Alternatively, you can send an email to [info@simplecapitalpartners.com](mailto:info@simplecapitalpartners.com) (marked for the attention of legal).