

Privacy Policy

24th May, 2018

CapVest Partners LLP ("CapVest") is dedicated to protecting the confidentiality and privacy of information entrusted to it. As part of this fundamental obligation, CapVest is committed to the appropriate protection and use of personal information (sometimes referred to as "personal data", "personally identifiable information" or "PII") that has been collected online.

Generally, our intent is to collect only the personal information that is provided voluntarily by online visitors so that we can offer information and/or services to those individuals or offer information about employment opportunities. Please review this privacy statement ("Privacy Statement") to learn more about how we collect, use, share and protect the personal information that we have obtained.

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1. Collection and use of personal information

1.1 What information we collect

We obtain personal information about you if you choose to provide it — for example, to contact mailboxes or to register for certain services. In some cases, you may have previously provided your personal information to CapVest (if, for example, you are a former employee). If you choose to register or login to the CapVest website using a third party single sign-in service that authenticates your identity and connects your social media login information (e.g., LinkedIn, Google, or Twitter) with CapVest, we will collect any information or content needed for the registration or log-in that you have permitted the social media provider to share with us, such as your name and email address. Other information we collect may depend on the privacy settings you have set with your social media provider, so please review the privacy statement or policy of the applicable service.

By registering and/or submitting personal information to CapVest, you are also acknowledging that CapVest may use this information in accordance with this Privacy Statement. Your personal information is not used for other purposes, unless we obtain your permission, or unless otherwise required or permitted by law or professional standards. For example, if you register to the CapVest website and provide information about your preferences we will use this information to personalise your user

experience. Where you register or login using a third party single user sign-in we may also recognise you as the same user across any different devices you use and personalise your user experience across other CapVest sites you visit. If you send us a resume or curriculum vitae (CV) to apply online for a position with CapVest, we will use the information that you provide to match you with available CapVest job opportunities.

In some cases where you have registered for certain services, we may store your email address temporarily until we receive confirmation of the information you provided via an email (i.e. where we send an email to the email address provided as part of your registration to confirm a subscription request).

1.2 The legal grounds we have to use your personal information

CapVest generally collects only the personal information necessary to fulfill your request. Where additional, optional information is sought, you will be notified of this at the point of collection.

The law in the UK allows us to process personal information, as long as we have grounds under the law to do so. It also requires us to tell you what those grounds are. As a result, when we process your personal information, we will rely on one of the following processing conditions:

- **Performance of a contract:** this is when the processing of your personal information is necessary in order to perform our obligations under a contract;
- **Legal obligation:** this is when we are required to process your personal information in order to comply with a legal obligation, such as keeping records for tax purposes or providing information to a public body or law enforcement agency;
- **Legitimate interests:** we may process information about you where it is in our legitimate interest in running a lawful business to do so in order to further that business, so long as it doesn't outweigh your interests; or
- **Your consent:** we may occasionally ask you for specific permission to process some of your personal information, and we will only process your personal information in this way if you agree to us doing so. You may withdraw your consent at any time by contacting Jing You at privacy@capvest.co.uk

*CapVest only collects "sensitive" personal information when the relevant individuals voluntarily provide us with this information or where such information is required or permitted to be collected by law or professional standards. Sensitive information includes personal information regarding a person's race, ethnicity, political beliefs, trade union membership, religious or similar beliefs, physical or mental health, sexual life or criminal record. Please use your discretion when providing sensitive information to CapVest, and under any circumstances, **do not provide sensitive information to CapVest, unless you thereby consent to CapVest's use of that information for its legitimate business purposes and consent to the transfer and storage of such information to and in CapVest databases.** If you have any questions about whether the provision of sensitive information to CapVest is, or may be, necessary or appropriate for particular purposes, please contact Jing You at privacy@capvest.co.uk.*

1.3 Automatic collection of personal information

In some instances, CapVest and its service providers uses cookies, web beacons and other technologies to automatically collect certain types of information when you visit us online, as well as through emails that we may exchange. The collection of this information allows us to customise your online experience,

improve the performance, usability and effectiveness of CapVest's online presence, and to measure the effectiveness of our marketing activities.

1.3.1 IP addresses

An IP address is a number assigned to your computer whenever you access the internet. It allows computers and servers to recognise and communicate with one another. IP addresses from which visitors appear to originate may be recorded for IT security and system diagnostic purposes. This information may also be used in aggregate form to conduct website trend and performance analysis.

1.3.2 Cookies

Cookies may be placed on your computer or internet-enabled device whenever you visit us online. This allows the site to remember your computer or device and serves a number of purposes.

On some of our pages, a notification banner will appear requiring your consent to collect cookies. If you do not provide consent, your computer or internet-enabled device will not be tracked for marketing-related activities. A secondary type of cookie referred to as "user-input" cookies may still be required for necessary functionality. Such cookies will not be blocked through the use of this notification banner. Your selection will be saved in a cookie and is valid for a period of 90 days. If you wish to revoke your selection, you may do so by clearing your browser's cookies.

Although most browsers automatically accept cookies, you can choose whether or not to accept cookies via your browser's settings (often found in your browser's Tools or Preferences menu). You may also delete cookies from your device at any time. However, please be aware that if you do not accept cookies, you may not be able to fully experience some of our website's features.

Further information about managing cookies can be found in your browser's help file or through sites such as www.allaboutcookies.org.

Below is a list of the types of cookies used on our website:

Purpose	Description	Type & Expiry
Performance (i.e. User's Browser)	Our website is built using common internet platforms. These have built-in cookies which help compatibility issues (e.g. to identify your browser type) and improve performance (e.g. quicker loading of content).	Session Deleted upon closing the browser
Security (e.g. Asp .NET) Cookies	If you register for access to a restricted area, our cookies ensure that your device is logged for the duration of your visit. You will need your username and password to access the restricted areas.	Session Deleted upon closing the browser
Site Preferences	Our cookies may also remember your site preferences (e.g. language) or seek to enhance your experience (e.g. by personalising a greeting or content). This will apply to areas where you have registered specifically for access or create an account.	Session Deleted upon closing the browser
Analytical	We use several third party analytics tools to help us understand how site visitors use our website. This	Persistent, but will delete automatically after two years

	allows us to improve the quality and content on www.capvest.co.uk for our visitors. The aggregated statistical data covers items such as total visits or page views, and referrers to our website. For further details on our use of Google Analytics, see below.	if you no longer visit www.capvest.co.uk
Site visitor feedback	<p>We use a third party survey tool to invite a percentage of visitors to provide their feedback. Cookies are used to prevent visitors from being invited multiple times.</p> <p>The first cookie (1) is set if the visitor is not invited to participate in the survey, and is used to ensure visitors are not invited after their first page view.</p> <p>The second cookie (2) is set if the visitor is invited to participate in the survey, and is used to ensure the visitor is not invited again to participate for a period of 90 days.</p>	<p>Session Deleted upon closing the browser</p> <p>2 Persistent Deleted automatically after 90 days or presenting survey invite.</p>
Social sharing	We use third party social media widgets or buttons to provide you with additional functionality to share content from our web pages to social media websites and email. Use of these widgets or buttons may place a cookie on your device to make their service easier to use, ensure your interaction is displayed on our webpages (e.g. the social share count cache is updated) and log information about your activities across the internet and on our website. We encourage you to review each provider's privacy information before using any such service. For further details on our use of social media widgets and applications, see below.	Persistent, but will be deleted automatically after two years if you no longer visit www.capvest.co.uk

Other third party tools and widgets may be used on our individual web pages to provide additional functionality. Use of these tools or widgets may place a cookie on your device to make their service easier to use, and ensure your interaction is displayed on our webpages properly.

Cookies by themselves do not tell us your email address or otherwise identify you personally. In our analytical reports, we may obtain other identifiers including IP addresses, but this is for the purpose of identifying the number of unique visitors to our website and geographic origin of visitor trends, and not to identify individual visitors.

BY NAVIGATING OUR WEBSITE OR ENTERING YOUR LOGIN DETAILS TO ACCESS AREAS RESERVED FOR REGISTERED USERS, YOU AGREE THAT WE CAN PLACE THESE COOKIES ON YOUR COMPUTER OR INTERNET ENABLED DEVICE.

1.3.3 Google Analytics

CapVest uses Google Analytics. More information about how Google Analytics is used by CapVest can be found here: <http://www.google.com/analytics/learn/privacy.html>

To provide website visitors with more choice on how their data is collected by Google Analytics, Google have developed the Google Analytics Opt-out Browser Add-on. The add-on communicates with the Google Analytics JavaScript (ga.js) to indicate that information about the website visit should not be sent to Google Analytics. The Google Analytics Opt-out Browser Add-on does not prevent information from being sent to the website itself or to other web analytics services.

1.3.4 Web beacons

A web beacon is a small image file on a web page that can be used to collect certain information from your computer, such as an IP address, the time the content was viewed, a browser type, and the existence of cookies previously set by the same server. CapVest only uses web beacons in accordance with applicable laws.

CapVest or its service providers may use web beacons to track the effectiveness of third party websites that provide us with recruiting or marketing services, or to gather aggregate visitor statistics and manage cookies.

You have the option to render some web beacons unusable by rejecting their associated cookies. The web beacon may still record an anonymous visit from your IP address, but cookie information will not be recorded.

In some of our newsletters and other communications, we may monitor recipient actions such as email open rates through embedded links within the messages. We collect this information to gauge user interest and to enhance future user experiences.

1.3.5 Location-based tools

CapVest may collect and use the geographical location of your computer or mobile device. This location data is collected for the purpose of providing you with information regarding services which we believe may be of interest to you based on your geographic location, and to improve our location-based products and services.

1.4 Social media widgets and applications

The CapVest website may include functionality to enable sharing via third party social media applications, such as the Facebook Like button and Twitter widget. These social media applications may collect and use information regarding your use of the CapVest website (see details on 'Social Sharing' cookies above). Any personal information that you provide via such social media applications may be collected and used by other members of that social media application and such interactions are governed by the privacy policies of the companies that provide the application. We do not have control over, or responsibility for, those companies or their use of your information.

In addition, the CapVest website may host blogs, forums, crowd-sourcing and other applications or services (collectively "social media features"). The purpose of social media features is to facilitate the sharing of knowledge and content. Any personal information that you provide on any CapVest social media feature may be shared with other users of that social media feature (unless otherwise stated at the point of collection), over whom we may have limited or no control.

1.5 Children

CapVest understands the importance of protecting children's privacy, especially in an online environment. In particular, our sites are not intentionally designed for or directed at children under the age of 16. It is our policy never to knowingly collect or maintain information about anyone under the age of 16, except as part of an engagement to provide professional services.

2. Sharing and transfer of personal information

2.1 Transfers to third parties

We do not share personal information with unaffiliated third parties, except as necessary for our legitimate professional and business needs, to carry out your requests, and/or as required or permitted by law or professional standards. This would include:

- Our service providers: CapVest work with reputable partners, service providers or agencies so they can process your personal information on our behalf. CapVest will only transfer personal information to them when they meet our strict standards on the processing of data and security. We only share personal information that allows them to provide their services.
- If we are reorganised or sold to another organization, CapVest may also disclose personal information in connection with the sale, assignment, or other transfer of the business of the site to which the data relates;
- Courts, tribunals, law enforcement or regulatory bodies: CapVest may disclose personal information in order to respond to requests of courts, tribunals, government or law enforcement agencies or where it is necessary or prudent to comply with applicable laws, court or tribunal orders or rules, or government regulations.
- Audits: disclosures of personal information may also be needed for data privacy or security audits and/or to investigate or respond to a complaint or security threat.

In addition, CapVest may transfer certain personal information outside of the EEA to companies working with us or on our behalf for the purposes described in this Privacy Statement. CapVest may also store personal information outside of the EEA. If we do this your personal information will continue to be protected by means of contracts we have in place with those organisations outside of the EEA, which are in a form approved by the European Commission. By providing personal information online, visitors are consenting to this transfer and/or storage of their personal information across borders.

CapVest will not transfer the personal information you provide to any third parties for their own direct marketing use.

3. Choices

In general, you are not required to submit any personal information to CapVest, but we may require you to provide certain personal information in order for you to receive additional information about our services and events. CapVest may also ask for your permission for certain uses of your personal information, and you can agree to or decline those uses. If you opt-in for particular services or communications, such as an e-newsletter, you will be able to unsubscribe at any time by following the

instructions included in each communication. If you decide to unsubscribe from a service or communication, we will try to remove your information promptly, although we may require additional information before we can process your request.

As described in "Cookies" above, if you wish to prevent cookies from tracking you as you navigate our website, you can reset your browser to refuse all cookies or to indicate when a cookie is being sent, however some portions of our sites may not work properly if you elect to refuse cookies.

4. Your rights

If you have submitted personal information to CapVest, you have the following rights:

Access – You can ask us to verify whether we are processing personal data about you, and if so, to provide more specific information.

Correction – You can ask us to correct our records if you believe they contain incorrect or incomplete information about you.

Erasure – You can ask us to erase (delete) your personal data after you withdraw your consent to processing, or when we no longer need it for the purpose it was originally collected.

Processing restrictions – You can ask us to temporarily restrict our processing of your personal data if you contest the accuracy of your personal data, prefer to restrict its use rather than having us erase it, or need us to preserve it for you to establish, exercise, or defend a legal claim. A temporary restriction may apply while verifying whether we have overriding legitimate grounds to process it. You can ask us to inform you before we lift that temporary processing restriction.

Data portability – In some circumstances, where you have provided personal data to us, you can ask us to transmit that personal data (in a structured, commonly used, and machine-readable format) directly to another company if it is technically feasible.

Automated Individual Decision-making – You can ask us to review any decisions made about you which we made solely based on automated processing, including profiling, that produced legal effects concerning you or similarly significantly affected you.

Right to Object to Direct Marketing Including Profiling – You can object to our use of your personal data for direct marketing purposes, including profiling. We may need to keep some minimal information to comply with your request to cease marketing to you.

Right to Withdraw Consent – You can withdraw your consent that you have previously given to one or more specified purposes to process your personal data. This will not affect the lawfulness of any processing carried out before you withdraw your consent. It may mean we are not able to provide certain products or services to you and we will advise you if this is the case.

You can make a request or exercise these rights by contacting privacy@capvest.co.uk and we will make all reasonable and practical efforts to comply with your request, so long as it is consistent with applicable law and professional standards.

5. Data security and integrity

CapVest has reasonable security policies and procedures in place to protect personal information from unauthorised loss, misuse, alteration, or destruction. Despite CapVest's best efforts however, security cannot be absolutely guaranteed against all threats. To the best of our ability, access to your personal information is limited to those who have a need to know. Those individuals who have access to the data are required to maintain the confidentiality of such information.

We also make reasonable efforts to retain personal information only for so long as the information is necessary to comply with an individual's request, or until that person asks that the information be deleted.

6. Links to other sites

Please be aware that the CapVest website may contain links to other sites, including sites maintained by other CapVest member firms that are not governed by this Privacy Statement but by other privacy statements that may differ somewhat. We encourage users to review the privacy policy of each website visited before disclosing any personal information.

7. Changes to this statement

CapVest may modify this Privacy Statement from time to time to reflect our current privacy practices. When we make changes to this statement, we will revise the "updated" date at the top of this page. We encourage you to periodically review this Privacy Statement to be informed about how CapVest is protecting your information.

8. Policy questions and enforcement

CapVest is committed to protecting the online privacy of your personal information. If you have questions or comments about our administration of your personal information, please contact us at privacy@capvest.co.uk. You may also use this address to communicate any concerns you may have regarding compliance with our Privacy Statement.

If you are not satisfied with the response you receive, you may escalate your concern to Jing You by sending an email to JYou@capvest.co.uk. We will acknowledge your email within 14 days and seek to resolve your concern within 3 months of receipt. We may accept your concern (and in that case implement one of the measures set out in the 'Your Rights' section above), or we may reject your concern on legitimate grounds.

In any event, you always have the right to lodge a complaint with the UK regulator in charge of protecting personal information, the Information Commissioner.