

# Privacy Notice

## 1. Scope

All data subjects whose personal data is collected, in line with the requirements of the General Data Protection Regulation (GDPR).

## 2. Responsibilities

2.1 The GDPR Owner is responsible for ensuring that this notice is made available to data subjects prior to Validus Risk Management Limited collecting/processing their personal data.

2.2 All EmployeesStaff of Validus Risk Management Limited who interact with data subjects are responsible for ensuring that this notice is drawn to the data subject's attention and their consent to the processing of their data is secured.

## 3. Privacy notice

### 3.1 Who are we?

"Validus Risk Management", "we", "us" and "our" means Validus Risk Management Limited and we are committed to respecting your privacy.

We are registered in the UK and our registered address is at 2nd Floor 119-120, High Street, Eton, Berkshire, SL4 6AN United Kingdom and our company registration number is 07140753.

Validus is a leading independent financial services firm, specialising in providing financial risk management, fund finance advisory and technology solutions to the alternative investment industry. With industry-leading analytical tools, strategic expertise and market insight we deliver practical and valuable solutions to institutional investors, fund managers and portfolio companies globally.

For the purposes of data protection law, we are a data controller in respect of your personal data. Validus Risk Management is responsible for ensuring that it uses your personal data in compliance with data protection law.

This privacy notice applies if you are a client or prospective client, supplier or prospective supplier, contact or any other person about whom we use personal data in the course of operating our business. The privacy notice sets out the basis on which any personal data about you that you provide to us, that we create, or that we obtain about you from other sources, will be processed by us. Please take the time to read and understand this privacy notice. Our GDPR Owner and data protection representatives can be contacted directly here: Ashley Young +44 (0)1753 386548 Compliance@validusrm.com



The personal data we would like to collect and process on you is:

**Information that you provide to us or one of our affiliates.** This includes information about you that you give us by filling in forms or by communicating with us, whether face-to-face, by phone, e-mail or otherwise. This information may include:

- personal information, for security, identification and verification purposes, such as name, addresses, telephone numbers, passport number, driving license number, residence records and vehicle records;
- biographical information, such as age and photographic images;
- employment information, such as National Insurance Number (or similar), job position, workplace names and addresses, education and professional information;
- employment information, such as National Insurance Number (or similar), job position, workplace names and addresses, education and professional information;
- financial information, such as financial accounts and banking information;
- legal and regulatory information, such as individual registration numbers, convictions, proceedings and criminal acts; and
- analysis and assessment information, such as our service and product performance.

The personal data we collect will be used for the following purposes:

- to provide our services to you and manage our relationships;
- to give you information about our relationship with you;
- to address any issues you raise with us;
- to evaluate and develop our services to you and other clients;
- to prevent, detect and investigate fraud, money laundering and other crimes, confirming your identity, and carrying out any other regulatory checks;
- to monitor, record and analyse any communications between you and us, including phone calls.
- to share your information with UK or other relevant tax authorities, credit reference agencies, fraud prevention agencies, and UK and overseas regulators and authorities.
- to fulfil our legal and regulatory obligations;
- to carry out our obligations arising from any agreements you enter into with us; and

Our legal basis for processing the personal data:

- we have legal and regulatory obligations that we have to discharge;
- we may need to in order to establish, exercise or defend our legal rights or for the purpose of legal proceedings; or
- the use of your personal data as described is necessary for our legitimate business interests (or the legitimate interests of one or more of our affiliates), such as:
- to make sure that our client relationships are well-managed, so that our clients are provided with a high standard of service, to protect our business interests and the interests of our clients.

Any legitimate interests pursued by us, or third parties we use, are as follows:

- where necessary to carry out an agreement with you; and
- where providing some services for us or on our behalf.

We will take steps to ensure that the personal data is accessed only by employees of such affiliates that have a need to do so for the purposes described in this notice.

We will take steps to ensure that the personal data is accessed only by employees of such affiliates that have a need to do so for the purposes described in this notice.

We may also share your personal data outside of Validus Risk Management and our affiliates:

- if we sell any of our business or assets, in which case we may disclose your personal data to the prospective buyer for due diligence purposes;
- if we are acquired by a third party, in which case personal data held by us about you will be disclosed to the third party buyer;
- to third party agents or contractors (for example, the providers of our electronic data storage services) for the purposes of providing services to us. These third parties will be subject to confidentiality requirements and they will only use your personal data as described in this privacy notice; and
- to the extent required by law, for example if we are under a duty to disclose your personal data in order to comply with any legal obligation, establish, exercise or defend our legal rights.

The special categories of personal data concerned are for employment purposes only.

If we require your consent for this activity, you may withdraw consent at any time by emailing: [compliance@validusrm.com](mailto:compliance@validusrm.com)

### 3.2 Disclosure

Validus Risk Management Limited may pass on your personal data to third parties without obtaining prior consent.

The personal data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). It may also be processed by staff operating outside of the EEA who work for our affiliates or for one of our suppliers. Where we transfer your personal data outside the EEA, we will ensure that it is protected in a manner that is consistent with how your personal data will be protected by us in the EEA. This can be done in a number of ways, for instance:

- the country that we send the data to might be approved by the European Commission;
- the recipient might have signed up to a contract based on "model contractual clauses" approved by the European Commission, obliging them to protect your personal data; or
- where the recipient is located in the US, it might be a certified member of the EU-US Privacy Shield scheme.

In other circumstances, the law may permit us to otherwise transfer your personal data outside the EEA. In all cases, however, we will ensure that any transfer of your personal data is compliant with data protection law.

You can obtain more details of the protection given to your personal data when it is transferred outside the EEA (including a copy of the standard data protection clauses which we have entered into with recipients of your personal data) by contacting us in accordance with the "Contacting us" section below

### 3.3 Retention period

Validus Risk Management Limited will process personal data for How long we hold your personal data for will vary. The retention period will be determined by various criteria including: and will store the personal data for

- the purpose for which we are using it – we will need to keep the data for as long as is necessary for that purpose; and
- legal obligations – laws or regulation may set a minimum period for which we have to keep your personal data.

### 3.4 Your rights as a data subject

At any point while we are in possession of or processing your personal data, you, the data subject, have the following rights:

- Right of access – you have the right to request a copy of the information that we hold about you.
- Right of rectification – you have a right to correct data that we hold about you that is inaccurate or incomplete.
- Right to be forgotten – in certain circumstances you can ask for the data we hold about you to be erased from our records.
- Right to restriction of processing – where certain conditions apply to have a right to restrict the processing.
- Right of portability – you have the right to have the data we hold about you transferred to another organisation.
- Right to object – you have the right to object to certain types of processing such as direct marketing.
- Right to object to automated processing, including profiling – you also have the right to be subject to the legal effects of automated processing or profiling.
- Right to judicial review: in the event that the organisation refuses your request under rights of access, we will provide you with a reason as to why. You have the right to complain as outlined in Clause 3.6 below.

All of the above requests will be forwarded on should there be a third party involved (as stated in 3.4 above) in the processing of your personal data.

### 3.5 Complaints

In the event that you wish to make a complaint about how your personal data is being processed by Validus Risk Management Limited (or third parties as described in 3.2 above), or how your complaint has been handled, you have the right to lodge a complaint directly with the supervisory authority and Validus Risk Management Limited's data protection representatives GDPR Owner

You can exercise your rights by contacting us using the details set out below.

You can find out more information about your rights by contacting the Information Commissioner's Office, or by searching their website at <https://ico.org.uk>.

The details for each of these contacts are:

**Supervisory authority contact details:**

Constantinos Tsolakas  
+44 (0)1753 386548

**GDPR Owner contact details:**

Ashley Young  
+44 (0)1753 386548  
Compliance@validusrm.com

### 3.6 How we use your information

#### Personal data

Under the GDPR, personal data is defined as:

"any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person."

#### How we use your information

This privacy notice tells you how we, Validus Risk Management Limited, will collect and use your personal data for

digital footprint information such as login name, IP addresses and web browsing behaviour information to assess any relationship with you including confirming your identity, checking for fraud, money laundering, and other regulatory checks;  
analysis and assessment information, such as our service performance, product analysis and market research, statistical and other reports; and

#### Why does Validus Risk Management Limited need to collect and store personal data?

In order for us to provide you with our services we need to collect personal data for information to assess any relationship with you including confirming your identity, checking for fraud, money laundering, and other regulatory checks.

In any event, we are committed to ensuring that the information we collect and use is appropriate for this purpose, and does not constitute an invasion of your privacy. In terms of being contacted for marketing purposes, Validus Risk Management Limited would request your specific consent for this processing.

### Will Validus Risk Management Limited share my personal data with anyone else?

We may pass your personal data on to third-party service providers contracted to Validus Risk Management Limited in the course of dealing with you. Any third parties that we may share your data with are obliged to keep your details securely, and to use them only to fulfil the service they provide you on our behalf. When they no longer need your data to fulfil this service, they will dispose of it in line with our procedures. If we wish to pass your sensitive personal data on to a third party, we will only do so once we have obtained your consent, unless we are legally required to do otherwise.

### How will Validus Risk Management Limited use the personal data it collects about me?

We will process (collect, store and use) the information you provide in a manner compatible with the GDPR. We will endeavour to keep your information accurate and up to date, and not keep it for longer than is necessary. We are required to retain certain information in accordance with the law, such as information needed for income tax and audit purposes. How long certain kinds of personal data should be kept may also be governed by specific business-sector requirements and agreed practices. Personal data may be held in addition to these periods depending on individual business needs. If you wish to know more about our retention and disposal procedures, please contact our GDPR Owner.

### Under what circumstances will Validus Risk Management Limited contact me?

Our aim is not to be intrusive, and we undertake not to ask irrelevant or unnecessary questions. Moreover, the information you provide will be subject to rigorous measures and procedures to minimise the risk of unauthorised access or disclosure.

### Can I find out the personal data that Validus Risk Management Limited holds about me?

At your request, we can confirm what information we hold about you and how it is processed. If we do hold personal data about you, you can request the following information:

- Identity and the contact details of the person or organisation that has determined how and why to process your data. In some cases, this will be a representative in the EU.
- Contact details of the data protection officer, where applicable.
- The purpose of the processing as well as the legal basis for processing.
- If the processing is based on the legitimate interests of Validus Risk Management Limited or a third party, information about those interests.
- The categories of personal data collected, stored and processed.
- Recipient(s) or categories of recipients that the data is/will be disclosed to.
- If we intend to transfer the personal data to a third country or international organisation, information about how we ensure this is done securely. The EU has approved sending personal data to some countries because they meet a minimum standard of data protection. In other cases, we will ensure there are specific measures in place to secure your information.
- How long the data will be stored.
- Details of your rights to correct, erase, restrict or object to such processing.
- Information about your right to withdraw consent at any time.
- How to lodge a complaint with the supervisory authority.
- Whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether you are obliged to provide the personal data and the possible consequences of failing to provide such data.
- The source of personal data if it was not collected directly from you.
- Any details and information of automated decision making, such as profiling, and any meaningful information about the logic involved, as well as the significance and expected consequences of such processing.

What forms of ID will I need to provide in order to access this?

We accept the following forms of ID when you request information about your personal data:

Driving Licenses, Passports, National ID Cards, Bank statements, utility bills (from the last three months)

Contact details of the GDPR Owner

Ashley Young

+44 (0)1753 386548

Compliance@validusrm.com

### ***Document owner and approval***

The Data Protection Officer/GDPR Owner is the owner of this document and is responsible for keeping it up to date.

The current version of this document is available to staff assigned to your account and is published on our systems.