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Capstan Capital Partners LLP Legal Information

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Capstan Capital Partners LLP

Privacy Policy

Capstan Capital Partners LLP (company number OC343883), 57 Grosvenor Street London W1K 3JA), (us or we) is committed to protecting and respecting your privacy. This Privacy Policy (together with our Terms & Conditions) set out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us and the purpose for our collection of it. Please read the following carefully to understand our practices regarding your personal data.

For the purposes of the General Data Protection Regulation (Regulation (EU) 2016/769) (**GDPR**), the data controller is Capstan Capital Partners LLP 57 Grosvenor Street London W1K 3JA and is entered in the Information Commissioner's Office (**ICO**) Register of Data Controllers with registration number Z1730822. We can be contacted at info@capstan-capital.com

By visiting our Site or by providing us with information you are accepting the practices described in this Privacy and Cookies Policy.

1. Collection of personal data

- i. This website www.capstan-capital.com (the "Website") is administered by Capstan Capital Partners LLP (FRN # 501275) ("Capstan", "we"). Capstan will only use personal data in accordance with the provisions set out in this Privacy Policy and in the Data Protection Act 1998 and the Privacy and Electronic Communications Regulations 2011. This policy, sets out the basis on which any personal data you provide to us by any means, will be collected and processed, the purposes of such processing and how we safeguard your personal data.
- ii. When you visit the website, Capstan may collect and process personal information about you, including but not limited to, your full name and contact details such as email address, home address and telephone number, user names, passwords and / or any other personal information deemed necessary:
 - a. received during certain calls to and from us
 - b. when you complete online forms;
 - c. when you respond to requests to submit personal information about yourself (if any);
 - d. when you otherwise contact us and we may keep a record of that correspondence;
or
 - e. based on any other information we receive about your transactions from our files, our affiliates or another source whether involved in your transactions or otherwise.

2. Use, storage and retention of personal data

- i. Capstan may collect and use information about visitors to the website to conduct its business, including identify your requirements, delivering services and information which you have

requested, promoting other services which may be of interest to you and collating web user statistics.

- ii. We may also use it to contact you for your views on our services and events and to notify you occasionally about important changes or developments to the website or our services, unless you have opted out of receiving such services as set out at paragraph 8.1 below.
- iii. We will retain your personal information for a minimum of seven years and so long as is reasonably necessary for the purpose for which it was obtained and in accordance with our legal and regulatory obligations and follow our data destruction policy and processes thereafter.
- iv. The personal information that we collect from you may be transferred to and stored at, a destination outside the European Economic Area (EEA).

Before we transfer your personal data outside the EEA we will take all steps reasonably necessary to ensure that any such transfer is made securely and that there is adequate protection in place in order to protect your personal data, as required by the Act and Chapter V of the GDPR. Please contact us if you wish to obtain more information regarding relevant safeguards. It may also be processed by staff operating outside the EEA who work for us, or a supplier. By submitting your personal information you agree to us transferring, processing and storing your personal information in this way.

3. Disclosure of Information and Personal Data

- i. We take all reasonable care to prevent any unauthorised access to your personal data.
- ii. We may disclose your personal information to:
 - a. any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 736 of the UK Companies Act 1985;
 - b. our affiliates or professional advisers; or
 - c. where we need to send the information to persons or organisations who work on our behalf to provide a product or services to you, but such persons or organisations may only use this information in order to provide such product or service and not for any other purpose.
- iii. We may also share or sell, as permitted by law, information to other companies who we believe may have products and services of interest to you. If you do not wish to receive information from us or from other sources, please follow the instructions in paragraph 8.1 below.
- iv. We may also share this information about our visitors, customers or former customers to companies that perform marketing services on our behalf or with whom we have joint marketing agreements.

4. How we protect your data

- i. Capstan takes all reasonable care to ensure the security of the website and of your personal information from access by unauthorised persons and against unlawful processing, accidental loss, destruction and damage. We will not share your information other than as provided for in this privacy policy or as required by law, court order or other government or law enforcement authorities.
- ii. After you have registered your e-mail address, we will send you a confirmation e-mail containing your log in details. As a member, it is your responsibility to protect your log in details. You must treat these as confidential and must not share or disclose your log in details to any other party.
- iii. The internet is not a secure medium, however, and Capstan cannot guarantee the security of your information absolutely and you acknowledge that we may be subject to breaches of security through no fault of our own.

5. Legal basis for using your personal data

Capstan's use of your personal data as outlined above is subject to different legal bases for processing, including where necessary for:

- i. the purposes of the performance of any contract we enter into with you or to take steps at your request prior to entering into a contract with you
- ii. our legitimate interests, for example in providing legal services to an entity you work for, managing and monitoring our website operation, preventing fraud and for our business compliance purposes
- iii. compliance with our legal and regulatory responsibilities.

If you do not agree to provide your personal data to us we may not be able to provide you with advisory services or process your application for other services or employment.

6. Your legal rights

The personal information we collect from you is protected under data protection law and you have a number of rights which you can seek to exercise. Please contact us in writing, by email or telephone if you wish to do so, or if you have any queries in relation to your rights. Please note these rights do not apply in all circumstances.

7. Cookies

- i. Capstan may track and process information and data in relation to your use of our website using "cookies". A cookie is a small file which is sent to your browser and stored on your computer's hard disc and helps us understand and track your use of the website and where we can improve the information and services provided.

We may use different types of cookie on this Website. None of them stores any information that identifies you personally, such as a name or postal address.

If you continue to use our Website, you agree to our use of cookies.

- ii. We use cookies solely to gather information on IP addresses and pages visited, to analyse trends, administer the website, track user's movements on the website and gather broad demographic

information for aggregate use. IP addresses are not linked to other personally identifiable information and will not be used to deliver targeted marketing messages.

- iii. We do not disseminate this information to anyone but Capstan's officers, employees and contractors. Most internet browsers allow you to stop receiving cookies via options/settings. You may enable these options/settings. However, this will mean that our system may not recognise your computer when you log in and so you may not be able to use or access certain parts of the website.
- iv. For information about cookies generally, please visit www.allaboutcookies.org

8. Links to other websites

- i. This website may contain links to other websites. This privacy policy extends only to this website and does not cover your use of, provision of data to and collection of data on any website not connected to us which you may link to by using hypertext links* within the website.
- ii. We recommend that you check the policy of each website that you visit and contact the owner or operator of that website if you have any concerns.

9. Changes

- i. We may edit or amend this privacy policy from time to time. If we make any substantial changes to this policy, we will notify you by using a prominent notice on the home page of the website.
- ii. As a result of improvements we make to our services, amendments to laws or regulation or developments in the technology or processes we use, we may change the information we hold about you and/or the way in which or the purposes for which we process such information. If we make any substantial change in the way in which we use your personal information we will notify you by email.

10. Contact / unsubscribe

- i. Questions, comments and requests regarding this privacy policy are welcome and should be addressed to info@capstan-capital.com
- ii. From time to time, Capstan or third parties who we think have products or services of interest to you may send you e-mails, e-mail newsletters, or news updates alerting you to new features, products, promotions, or services pertaining to the website. If you no longer wish to receive materials from us and/or from such third parties, you may opt-out of receiving these communications by writing to us at 57 Grosvenor Street, London, W1K 3JA or by emailing us your request to 'unsubscribe' at info@capstan-capital.com

Capstan Capital Partners LLP

Anti-Bribery and Corruption Policy

1. Introduction

Capstan Capital Partners LLP values its reputation for ethical behaviour and for financial probity and reliability. It recognises that over and above the commission of any crime, any involvement in bribery will also reflect adversely on its image and reputation. Its aim therefore is to limit its exposure to bribery by:

- a. Setting out a clear anti-bribery policy;
- b. Training all consultants and clients, so that they can recognise and avoid the use of bribery by themselves and others;
- c. Encouraging its consultants and clients to be vigilant and to report any suspicion of bribery, providing them with suitable channels of communication and ensuring sensitive information is treated appropriately;
- d. Notifying all third parties that the Partnership engage with of its policy and zero tolerance of bribery and/or corruption.
- e. Rigorously investigating instances of alleged bribery and assisting the police and other appropriate authorities in any resultant prosecution;
- f. Taking firm and vigorous action against any individual(s) involved in bribery

2. The Policy

Capstan Capital Partners LLP prohibits:

the offering, the giving, the solicitation or the acceptance of any bribe, whether cash or other inducement

to or from

any person or company, wherever they are situated and whether they are a public official or body or private person or company

by

any individual consultant, agent or other person or body acting on the Partnership's behalf

in order to

gain any commercial, contractual or regulatory advantage for the Partnership in a way which is unethical

or in order to

gain any personal advantage, pecuniary or otherwise, for the individual or anyone connected with the individual.

3. Further Clarification

The Partnership recognises that market practice varies across the territories in which it does business and what is normal and acceptable in one place may not be in another. This policy prohibits any inducement which results in a personal gain or advantage to the recipient or any person or body associated with them, and which is intended to influence them to take action which may not be solely in the interests of the Partnership or of the person or body employing or contracting with them or whom they represent.

This policy is not meant to prohibit the following practices providing they are customary in a particular market, are proportionate and are properly recorded:

- a. normal and appropriate hospitality
- b. the giving of a gift for a corporate reason or at another special time, as long as reported in the proper manner within the firm on the gifts register

Inevitably, decisions as to what is acceptable may not always be easy. If anyone is in doubt as to whether a potential act constitutes bribery, the matter should be referred to the local senior manager with responsibility for this policy before proceeding. If necessary, guidance should also be sought from the Compliance Officer.

4. Responsibility within Capstan Capital Partners LLP

The prevention, detection and reporting of bribery is the responsibility of all persons throughout the partnership. Suitable channels of communication by which consultants or others can report confidentially any suspicion of bribery will be maintained via the Anti-Corruption Reporting procedures.

Useful resource: www.transparency.org.uk for the Transparency Index

A fuller Policy and Procedures outlining all the Principals of the Act can be requested from the Compliance Officer.