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Capstan Capital Partners LLP Legal Information

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Capstan Capital Partners LLP

Privacy 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. when you register, log in or complete other online forms;
 - b. when you respond to requests to submit personal information about yourself (if any);
 - c. when you otherwise contact us and we may keep a record of that correspondence;
or
 - d. 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 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. The personal information 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 the EEA who work for us, or a supplier. By submitting your personal details you agree to us transferring, processing and storing your personal information in this way.

3. Disclosure of Information

- 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. 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.

- 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

6. 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.

7. 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.

8. 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.