

Truffle Invest Ltd Privacy Policy

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CONTENTS

1. General
1. How will your personal data be used
2. Your rights
3. Security
4. Identity and Contact Details
5. Complaints
6. Appendices

1 GENERAL

GDPR requires data controllers to provide individuals with a privacy notice containing information about how and why their personal data is processed. The purpose of a privacy notice is to enable you to make an informed decision about how your personal data will be used in your dealings with us or someone else acquiring, using and/or processing your personal data.

A privacy notice must be:

- i. concise, transparent, intelligible, and easily accessible
- ii. written in clear and plain language; and
- iii. free of charge

2 BASIS OF PROCESSING

GDPR requires data controllers to establish the lawful basis(es) for processing your personal data. The following bases have been established:

- i. consent
- ii. contract
- iii. legal obligation
- iv. legitimate interests

3 HOW WILL YOUR PERSONAL DATA BE SOURCED?

We anticipate sourcing your personal data from:

- i. business/v-cards you have given to us
- ii. online questionnaires you have accessed via our website or social media content
- iii. face-to-face or telephone meetings
- iv. internet searches and social media platforms such as LinkedIn, Facebook, Twitter
- v. details provided to us by event promoters and/or professional trade bodies
- vi. personal/business introductions from referrers and/or our associates and partners

4 HOW WILL YOUR PERSONAL DATA BE USED?

4.1 Marketing

Your basic personal data may be used for marketing purposes which will include:

- i. direct communication about our services, products, events and seminars
- ii. newsletters and updates about us and our associates
- iii. newsletters and updates about financial services and private markets investing

Truffle Invest Ltd is an Appointed Representative (FRN 816214) of Met Facilities LLP which is authorised and regulated by the Financial Conduct Authority (FRN 587084). Truffle Invest Ltd is registered in England with registered company number 11276896 and registered office at Truffle Invest Ltd, 67 Wingate Square, London, SW4 0AF.

Your personal data may be provided to third party marketing support vendors with a view to ensure compliance with GDPR and generally for functionality and performance purposes.

Your personal data may be shared with our associates and other professional service providers on a case-by-case basis when you have indicated to us that you would like us to help you in this regard. You can ask us to not share your personal data at any time.

We will not rent or sell your personal data to any third party.

We will keep your basic personal data for marketing purposes until you notify us that you no longer wish to receive this information.

4.2 Regulatory

If you provide (or we receive) your personal data with a view to us providing you (or your business associates) with a financial or other service, your information may be used for due diligence and compliance purposes which will include; verifying your identity and address, verifying your eligibility to participate in investments made available by Truffle Invest Ltd, undertaking KYC and AML checks (including by third parties appointed by Truffle Invest Ltd).

Your personal data may be provided and/or otherwise shared with:

- i. regulatory authorities, law enforcement agencies, by request or order of a court, a government authority
- ii. third party vendors undertaking custodial, administrative, legal, audit and other work on behalf of Truffle Invest Ltd
- iii. where necessary for our legitimate interest such as investigating fraud and other criminal behaviour
- iv. defending or prosecuting a legal claim
- v. protecting your safety and the safety of others
- vi. maintaining compliance with applicable laws, regulations and/or professional obligations; and
- vii. other financial services firms where the primary purpose of their processing of your personal data is for legitimate due diligence and compliance purposes.

We will keep detailed personal data for legitimate regulatory purposes for no less than the minimum period prescribed by each relevant regulatory body, plus a period of 12 months thereafter.

4.3 No Sensitive Data

Our business does not require us to ask for or need “sensitive” or “special” categories of personal data, such as information about your health, political opinions, racial origins or sex life. We also do not provide products or services to persons under 16 years of age. Please do not provide this type of information to us.

4.4 Cookies

In common with most electronic platforms such as websites and portals, we use cookies to capture certain analytical, performance and social media sharing information about your visits. We do not use cookies to make/serve up targeted advertisements.

4.5 Transfers Out of the EEA

We may transfer your personal data outside the EEA for the purposes set out in this privacy notice. We will put in place appropriate measures to safeguard your personal data in such circumstances.

5 YOUR RIGHTS

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Under the GDPR you have a number of rights over our use of your personal data. You have the right to:

- i. request from us access to and obtain a copy of your personal data;
- ii. rectification of incorrect or incomplete data;
- iii. erasure of your personal data where there is no legitimate basis for it be held;
- iv. restrict processing;
- v. object to processing as well as, in certain circumstances, the right to data portability.

If you have provided consent for us to process your personal data, you have the right (in certain circumstances) to withdraw consent at any time which will not affect the lawfulness of the processing before consent was withdrawn.

You have the right to complain to the Information Commissioner's Office if you think that we have not complied with the relevant requirements of the GDPR.

6 SECURITY

Access to your personal data is limited to authorised personnel and those personnel authorised by our data processor vendors. Data access is controlled by senior management.

7 UPDATES

Truffle Invest Ltd may update this Privacy Policy. In the event the Policy is updated, the new Policy will be made available on Truffle Invest Ltd and you will be informed of the update by email or by a notice on www.truffleinvest.com. We encourage users to regularly review our website for the latest information on our Privacy Policy.

8 CONTACT DETAILS

Any matters or complaints relating to our processing of your personal data may be raised with Truffle Invest Ltd by contacting us at info@truffleinvest.com or by writing to Truffle Invest Ltd, 67 Wingate Square, London, SW4 0AF

9 COMPLAINTS

To the Data Protection Officer: info@truffleinvest.com

To the Information Commissioner's Office If you remain dissatisfied about the way we have dealt with your complaint, you may apply to the Information Commissioner for a decision: www.ico.org.uk

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