

Privacy Policy and Notice

June 2022

Privacy

Odyssean Capital LLP (“OCL”) respects your right to privacy. This Privacy Notice explains how we collect, share and use personal data about you, and how you can exercise your privacy rights.

The term “personal data” under the UK General Data Protection Regulation (“UK GDPR”) 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”.

If you have any questions or concerns about our use of your personal data, then please contact us using the contact details provided at the end of this Privacy Notice.

Types of personal data we may collect and use

The categories of personal data we may collect will depend on the nature of our relationship with you and the purpose of which information is being collected. Such personal data may include names, residential addresses or other contact details, signature, nationality, date and place of birth, national insurance or other tax identification number, photographs, visual images collected via closed-circuit television (CCTV), copies of identification documents, bank account details, information about assets or net worth, credit history, criminal and administrative offences, source of funds details, or other sensitive information, such as certain special categories of personal data contained in relevant documents or materials.

Where/how do we collect personal data?

We may collect personal data about you through:

- information provided directly to us by you, or another person on your behalf, through our website, by email or post, or in person;
- information that we obtain in relation to any transactions between you and us;
- recording and monitoring of telephone conversations and electronic communications with you as described below; or
- the use of Internet “cookies” (an information collecting device from a web server), as described further below.

We may also, in some circumstances, receive personal information about you from third parties, such as service providers or trading counterparties, regulatory or law enforcement agencies, credit reference agencies and agencies conducting background checks. Personal information may also be obtained from publicly accessible sources of information, such as public databases, industry associations, social media and online professional networks.

Legal basis for processing personal data

We will only process your data where we have a legal basis for doing so. We may rely on the following legal bases for collecting and further processing your personal data:

- Contractual necessity e.g. to fulfil our obligations in respect of your account, policy or service;

- Legal or regulatory obligation;
- Legitimate interest (detailed below) - in this instance the processing must be “necessary” and must balance the interests of the controller with the rights of the individual; or
- Consent.

Legitimate interest

We may use your personal data for our legitimate business interests in order to allow us to provide the best services and customer experience and to ensure our service remains relevant and tailored to your needs. For example, we may rely on our legitimate interest to process your personal data for the following purposes:

- Marketing, relating to products and services compatible with the original purpose for which we originally gained the information;
- To send you company updates, newsletters or other marketing communications;
- To enhance, modify, personalise or otherwise improve our services and communications for your benefit.

Please note you have the right to object to any processing for which we rely on legitimate interest as the legal basis. You can do so by using the contact details set out at the end of this privacy notice.

Who we share your personal data with?

We may share your personal data with approved third parties that have adequate data protection measures. These third parties include for example:

- professional companies and other persons providing services to us and our clients including legal, professional advisers, auditors, tax and accountancy advisers, trading counterparties, fund administrators, distributors, introducers;
- group companies (within the Harwood Capital Management Group);
- any person to whom we have a right or obligation to disclose personal data, or where we determine that disclosure is necessary to protect or defend our rights or property, including with regulators (such as the Financial Conduct Authority), courts of law, governmental, regulatory or law enforcement agencies;
- credit reference agencies and other third parties conducting background checks in the context of employment or client, counterparty, or investment due diligence; or
- any person, as directed by you.

We will never sell your personal information to someone else. Whenever we share your personal information, we will do so in line with our obligations to keep your information safe and secure.

How do we keep your personal data secure?

We use appropriate technical and organisational measures to protect the personal data that we collect and process about you. The measures we use are designed to provide a level of security appropriate to the risk of processing your personal data.

Do we use automated decision-making processes?

No

How long we keep your information?

We will retain your personal data for as long as necessary to fulfil the purposes for which it was collected, including for the purposes of satisfying any legal, regulatory, accounting or reporting requirements and our legitimate interests in maintaining such personal information in our records. We keep your personal information for the duration you are a client of ours in order that we may provide you with our services. In the event you are no longer a client, we may also keep your

information after this period but only where we are required to meet our legal and or regulatory obligations.

We will regularly review our records to ensure that we do not retain your personal data longer than is necessary, unless there is a legal reason for extended retention.

Your rights in respect of your data are:

- Right to be informed. You have the right to be informed of what we do with your data. The detail of what we do is in this privacy notice.
- Right of access. You can request a copy of the personal information we hold about you.
- Right to request rectification. We take reasonable steps to keep your information accurate, but you can also ask us to change any information we hold about you to keep it accurate, complete and current.
- Right to request erasure ('to be forgotten'). You have the right to ask us to delete the personal information we hold on you; however, please note that there may be circumstances where you ask us to erase your personal data but we are legally entitled to retain it.
- Right to data portability. You have the right to request that we send the personal data you provided to us to another data controller in a commonly used electronic format, where technically feasible.
- Right to request restriction. You can request that we restrict our processing of your personal information.
- Right to raise an objection to our processing. Where our processing of your information is performed on the basis of 'legitimate business interest', then you can request we stop.
- Right to complain to a supervisory authority. If you are dissatisfied with our use or management of your personal information, you have the right to complain to a Data Protection Supervisory Authority. In the UK, the relevant Data Protection Supervisory Authority is the Information Commissioner's Office (ICO) and you can contact them via their website: www.ico.org.uk

Accuracy of information

It is important that the personal data we hold about you is accurate and current. Please let us know if your personal data which we hold changes during your relationship with us.

Updates to this Privacy Notice

We may make changes to this policy from time to time and will post such updates on our website.

How to contact us?

If you have any questions or concerns about our use of your personal data, please contact us at info@odysseancapital.com

The data controller of your personal data is Odyssean Capital LLP, 6 Stratton Street, Mayfair, London W1J 8LD.

Telephone conversations

We may record and monitor telephone conversations with you in order to comply with our regulatory requirements.

Cookie Notice

A cookie is a small text file – it is saved onto your device (e.g. computer, smartphone or other device which accesses the internet) when you visit our website. Cookies store small pieces of information. For example, they will remember you have visited our website or performed a certain action.

Cookies are used by nearly all websites and do not harm your system.

We may use cookies to track your use of our website. This enables us to understand how you use the site and track any patterns that emerge individually or from larger groups. This helps us to develop and improve our website and services in response to what our visitors want and need.

You can at any time change or withdraw your consent from the cookie declaration on our website (in the top right hand corner).

What type of cookies do we use?

To make your experience as relevant and secure as possible we use the following cookies on our website.

Necessary cookies - These cookies are required for the basic function of our website. They make it easier for you to access content. These cookies may, for example, remember your language preferences or recognise an individual's activity within a single session. Functional cookies cannot be deactivated.

Analytics/Statistics cookies - These cookies enable us to understand how visitors interact with our website by collecting and reporting information anonymously.

Marketing cookies – These cookies are used to track visitors across websites. The intention is to display ads that are relevant and engaging for the individual user and thereby more valuable for publishers and third party advertisers.