



HIDDEN ROAD P A R T N E R S

**Privacy Policy for Hidden Road Partners LP
and subsidiaries including
Hidden Road Partners CIV US LLC
Hidden Road Partners CIV UK Ltd.
Hidden Road Partners CIV US OTC LLC**

Hidden Road Partners LP and its affiliates, including Hidden Road Partners CIV US LLC, Hidden Road Partners CIV US OTC LLC, Hidden Road Partners CIV UK Ltd and Hidden Road Partners UK LLP (collectively ‘Hidden Road’) understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of everyone who visits this website and will only collect and use personal data in ways that are described here, and in a way that is consistent with our obligations and your rights under the law.

Please read this Privacy Policy carefully and ensure that you understand it.

1. What Does This Policy Cover?

This Privacy Policy applies only to your use of this site. This site may contain links to other websites. Please note that we have no control over how your data is collected, stored, or used by other websites and we advise you to check the privacy policies of any such websites before providing any data to them.

2. What Is Personal Data?

Personal data is defined by the General Data Protection Regulation (EU Regulation

2016/679) (the “GDPR”) and the Data Protection Act 2018 (collectively, “the Data Protection Legislation”) as ‘any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier’.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

3. **What Are My Rights?**

Under the Data Protection Legislation, you have the following rights, which we will always work to uphold:

- a) The right to be informed about our collection and use of your personal data. This Privacy Policy should tell you everything you need to know, but you can always contact us to find out more or to ask any questions using the details in Part 12.
- b) The right to access the personal data we hold about you. Part 11 will tell you how to do this.
- c) The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete. Please contact us using the details in Part 12 to find out more.
- d) The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that we hold. Please contact us using the details in Part 12 to find out more.
- e) The right to restrict (i.e. prevent) the processing of your personal data.
- f) The right to object to us using your personal data for a particular purpose or purposes.
- g) The right to withdraw consent. This means that, if we are relying on your consent as the legal basis for using your personal data, you are free to withdraw that consent at any time.
- h) The right to data portability. This means that, if you have provided personal data to us directly, we are using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask us for a copy of that personal data to re-use with another service or business in many cases.
- i) Rights relating to automated decision-making and profiling. We do not use your personal data in this way.

For more information about our use of your personal data or exercising your rights as outlined above, please contact us using the details provided in Part 12.

It is important that your personal data is kept accurate and up-to-date. If any of the personal data we hold about you changes, please keep us informed as long as we have that data.

Further information about your rights can also be obtained from the Information Commissioner’s Office or your local Citizens Advice Bureau for Hidden Road Partners CIV UK Ltd and Hidden Road Partners UK LLP.

If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office. We would welcome the opportunity to resolve your concerns ourselves, however, so please contact us first, using the details in Part 12.

4. What Data Do You Collect and How?

Depending upon your use of this site, we may collect and hold some or all of the personal and non-personal data, using the methods discussed below. We do not collect any personal data relating to children

Data collected via the Website's Client Onboarding Portal[A1] [A2]will[A3] include your name, company name, contact details for specific individuals in your organisation, including phone number and email. It will also include information about your business such as corporate structure, portfolio samples, risk profile, revenue and historical returns, capital structure, compensation structure and other related matters to allow us to undertake appropriate due diligence. This is all data that you will input into the portal.

5. How Do You Use My Personal Data?

Under the Data Protection Legislation and SEC Regulation SP (if applicable) , we must always have a lawful basis for using personal data. As noted above, we will use your personal data to undertake due diligence and assess your credit standing prior to offering and pricing services to you, based on your requests for products in the portal. We will also use your personal data and any updated personal data to facilitate ongoing monitoring of your account and the services we offer.

We will not use your personal data for marketing purposes. You will not be sent any unlawful marketing or spam.

We will only use your personal data for the purpose(s) for which it was originally collected unless we reasonably believe that another purpose is compatible with that or those original purpose(s) and need to use your personal data for that purpose. If we do use your personal data in this way and you wish us to explain how the new purpose is compatible with the original, please contact us using the details in Part 12.

If we need to use your personal data for a purpose that is unrelated to, or incompatible with, the purpose(s) for which it was originally collected, we will inform you and explain the legal basis which allows us to do so.

In some circumstances, where permitted or required by law, we may process your personal data without your knowledge or consent. This will only be done within the bounds of the Data Protection Legislation and your legal rights.

6. How Long Will You Keep My Personal Data?

We will not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected or for such time as required by applicable regulation.

7. **How and Where Do You Store or Transfer My Personal Data?**

Your personal data will only be held in the portal during the account onboarding process. Once you submit your data, the data is sent to Amazon S3 cloud-based storage service for storage and deleted from the portal. Personal data submitted to this portal and to the AWS system is secured using data at rest and in transit encryption. Data loss and intrusion prevention systems and advanced network monitoring tools are employed further securing this application environment. It should be noted, even with advanced security policies and platforms in place, there is always a risk of data loss.

We may store or transfer some or all of your personal data in countries that are not part of the European Economic Area (the “EEA” consists of all EU member states, plus Norway, Iceland, and Liechtenstein). These are known as “third countries” and may not have data protection laws that are as strong as those in the UK and/or the EEA. This means that we will take additional steps in order to ensure that your personal data is treated just as safely and securely as it would be within the UK and under the Data Protection Legislation as follows:

We share your data within the group of companies of which we are a part. Where this involves the transfer of personal data outside the EEA, our group ensures that personal data is protected by requiring all companies within the group to follow the same rules with respect to personal data usage. These are known as “binding corporate rules”. More information on binding corporate rules is available from the [European Commission](#).

Please contact us using the details below in Part 12 for further information about the particular data protection mechanism[s] used by us when transferring your personal data to a third country.

The security of your personal data is essential to us, and to protect your data, we take a number of important measures, including the following:

- limiting access to your personal data to those employees, agents, contractors, and other third parties with a legitimate need to know and ensuring that they are subject to duties of confidentiality;
- procedures for dealing with data breaches (the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, your personal data) including notifying you and/or the Information Commissioner’s Office where we are legally required to do so;

8. **Do You Share My Personal Data?**

We will not share any of your personal data with any non-affiliated third parties for any purposes, other than those third parties that are providing services to us to support our product offering.

If we sell, transfer, or merge parts of our business or assets, your personal data may be transferred to a third party. Any new owner of our business may continue to use your personal data in the same way(s) that we have used it, as specified in this Privacy Policy.

In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.]

9. **Can I Withhold Information?**

In order to access the portal, you will be required to submit certain personal data.

10. **How Can I Access My Personal Data?**

If you want to know what personal data, we have about you, you can ask us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a “subject access request”.

All subject access requests should be made in writing and sent to the email shown in Part 12.

There is not normally any charge for a subject access request. If your request is ‘manifestly unfounded or excessive’ (for example, if you make repetitive requests) a fee may be charged to cover our administrative costs in responding.

We will respond to your subject access request within 28 days and, in any case, not more than one month of receiving it. Normally, we aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date we receive your request. You will be kept fully informed of our progress.

11. **How Do I Contact You?**

To contact us about anything to do with your personal data and data protection, including to make a subject access request, please use the following email:

Email address: dpo@hiddenroad.com

12. **Changes to this Privacy Policy**

We may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects personal data protection.

Any changes will be immediately posted on this website and you will be deemed to have accepted the terms of the Privacy Policy on your first use of the website following the alterations. We recommend that you check this page regularly to keep up-to-date. This Privacy Policy was last updated on 22 April 2020.