



Islandbridge Capital Limited

Privacy Policy Statement

May 2018

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1. INTRODUCTION

Islandbridge Capital Limited (“Islandbridge”) is committed to conducting its business in accordance with all applicable Data Protection laws and regulations and in line with the highest standards of ethical conduct. This policy sets forth the expected behaviours of Islandbridge Employees and Third Parties in relation to the collection, use, retention, transfer, disclosure and destruction of any Personal Data belonging to an Islandbridge Contact (i.e. the Data Subject).

Personal Data is any information (including opinions and intentions) which relates to an identified or Identifiable Natural Person. Personal Data is subject to certain legal safeguards and other regulations, which impose restrictions on how organisations may process Personal Data.

An organisation that handles Personal Data and makes decisions about its use is known as a Data Controller. Islandbridge, as a Data Controller, is responsible for ensuring compliance with the Data Protection requirements outlined in this policy. Non-compliance may expose Islandbridge to complaints, regulatory action, fines and/or reputational damage.

Islandbridge’s Board of Directors is fully committed to ensuring continued and effective implementation of this policy, and expects all Islandbridge Employees and Third Parties to share in this commitment. Any breach of this policy will be taken seriously and may result in disciplinary action or business sanction

Islandbridge has appointed Russell Elam as the Data Controller.

2. WHAT ISLANDBRIDGE USE PERSONAL DATA FOR

Islandbridge store and processes Personal Data for one, all, or a combination of the below reasons.

1. Promotion of the Islandbridge Opportunities Fund – an unregulated collective investment scheme
2. Promotion of Islandbridge Products and Services, for example, Family Office / Advisory Services
3. Promotion of Co-Investment Opportunities.
4. Known investors in an asset class in which Islandbridge are able to conduct regulated activities.
5. Distribution of firm news / updates / charitable projects / firm events and general announcements made in the course of doing business.

A database is held by the Data Controller to identify which purpose the Data Subject’s personal Data is being stored.

We will not share your Personal Data unless we have consent to do so from the Data Subject. Islandbridge do not sell on Personal Data.

3. WHAT DATA DO ISLANDBRIDGE HOLD

Islandbridge store Personal Data on Data Subjects that will contain at least one of the following:

1. First Name, Middle Name, Surname
2. Date of Birth
3. Country of Residence
4. Company / Employer / Previous Employer
5. Email Address
6. Telephone Numbers (Landline, Mobile, Fax)
7. Details of any Regulatory Approvals (Firm and Individual Level)
8. Specific interest in Islandbridge Products / Services (for example, Data Subject has previously expressed an interest in investing in the Islandbridge Opportunities Fund)
9. Risk Appetite
10. Regulatory Professional Client Categorisation (ie FCA Retail Client, FCA Elective Professional Client).
11. Notes on any correspondence we may have had with the Data Subject

The Data Controller maintains a number of database files which individually maintain records of the above. In some instances a Data Subject may appear on one or more internal database files.

4. HOW WE COLLECT YOUR PERSONAL DATA

We will only collect and use your personal data where we have legitimate business reasons to do so. We may obtain Personal Data from you to provide you a service or when we provide a service to one of our clients, when you contact us or visit our offices, including when you call us, get in touch with us via our website, or when you or your organisation corresponds with us using any means of communication. This includes Personal Data provided to us:

1. in regard to services we provide;
2. when you contact us with a question or enquiry via our website or by calling our office;
3. when you contact us about potential employment opportunities with Islandbridge;

4. when you provide our staff, Directors, client and investors with business cards or contact details;
5. if you deal with us when we are providing services to one of our clients;
6. when we receive referrals from other employees, clients or suppliers;
7. when you make a complaint;
8. when you deal with us in order to provide us with goods or services;
9. when staff give us your details as an emergency contact; or
10. when candidates give us your details as a referee.

We may also collect your Personal Data when we search websites where you have posted your data to be found in relation to legitimate business opportunities (as defined in Article 6 of the GDPR).

We will of course let you know at the earliest opportunity when we have gathered your data in this manner, which may be in the form of a link to this Privacy Policy included within our email disclaimer.

5. YOUR RIGHTS

You have several legal rights in relation to the Personal Data that we hold about you. These include:

1. the right to obtain information regarding the processing of your Personal Data and access to the Personal Data we hold about you;
2. the right to withdraw your consent to our processing of your Personal Data at any time. Please note, however, that we may still be entitled to process your Personal Data if we have a legitimate reason for doing so;
3. in some circumstances, the right to receive some personal data in a structured, commonly used and machine-readable format and/or request that we transmit that personal data to a third party where this is technically feasible. Please note that this right only applies to personal data which you have provided to us;
4. the right to request that we rectify your Personal Data if it is inaccurate or incomplete;
5. the right to request that we erase your personal data in certain circumstances. Please note that there may be circumstances where you ask us to erase your Personal Data but we are legally entitled to retain it;
6. the right to object to and the right to request that we restrict our processing of your Personal Data in certain circumstances. Again, there may be circumstances where you

object to or ask us to restrict our processing of your personal data but we are legally entitled to continue processing your Personal Data and / or to refuse that request; and

7. the right to lodge a complaint with the Information Commissioner's Office if you think that any of your rights have been infringed by us.

You can exercise your rights by contacting us - see the "Contact Us" section below.

You can find out more information about your rights by contacting the Information Commissioner's Office or by visiting their website at <https://ico.org.uk>

6. OPTING OUT / CONTACT US

Data Subjects are able to request that Islandbridge remove their Personal Data by emailing privacy@ib-capital.com. This inbox is monitored by the Data Controller.

Data Subjects are also able to request that Islandbridge Provide them with details of the Personal Data held on file in addition to how Islandbridge use that data.

7. VERSION CONTROL

This privacy notice was last updated on the 17th of May 2018.

We will update this Notice from time to time and you should review it whenever you visit our website or before providing us with any personal data about yourself.