

PATRON CAPITAL ADVISERS LLP - PRIVACY AND COOKIE POLICY

Introduction

This privacy and cookie policy (**Policy**) explains how Patron Capital Advisers LLP (**Patron Capital, we, our, us**) processes the personal data of users (**you**) of the website hosted at www.patroncapital.com (**Site**).

This Policy is part of and is incorporated into the terms and conditions of the Site (**Terms**). The Terms are available [here](#).

Patron Capital is the data controller of your personal data and is subject to the Data Protection Act 1998 (**DPA**) and, once in force, EU General Data Protection Regulation 2016/679 (**GDPR**).

Patron Capital is registered as a data controller with the UK Information Commissioner's Office under registration number Z2745781.

Patron Capital may amend this Policy from time to time by uploading a replacement Policy to the Site. You should check the Policy periodically for any changes. This Policy is current as of 23rd May 2018.

If you have any questions about this Policy, please contact the Data Protection Representative at legal@patroncapital.com.

How your personal data is collected

When you use the Site, we collect your personal data in the following ways:

-) When you log-in and use the Investor Portal;
-) When you access and navigate around the Site (see our section on **Cookies** below in this respect);
-) When you communicate with us by email or via the Site, for example when you require support or submit an enquiry.

The categories of personal data collected

The following categories of personal data about you are collected by us:

-) Log-in information (if you have registered for the Investor Portal);
-) Information about your use of the Site collected through the use of cookies including your log-in information where you have previously requested to have your username and password "remembered". See our section on **Cookies** below in this respect.

The basis for processing your personal data, how that data is used and whom it is shared with

(i) We may process your personal data because it is necessary for our legitimate interests.

In this respect, personal data will be used by us for the following:

-) To enable you to log-in and use the Investor Portal and to access secure content, including downloading documents;
-) To contact you regarding your access to the Investor Portal and to keep you informed of important changes or developments to the Site;
-) To analyse, administer, support and improve our Site;
-) As part of a reorganisation, sale or negotiations for sale of all or part of our business.

In this respect your personal data may be shared with the following:

-) Our IT providers, including our Site provider;
-) Third parties who may from time to time assist in providing marketing services to us;

-)] Potential purchasers or investors (and their advisers) in the event of the sale of the whole or any related part of our business).

(ii) Your personal data will also be processed by us for compliance with our legal obligations. In this respect, personal data will be used by us for the following:

-)] To fulfil our obligations under any reporting agreement entered into with any tax authority or revenue service(s) from time to time, as is necessary for compliance with our legal obligations;
-)] To meet our other compliance and regulatory obligations including in order to comply with any requirement of any applicable statute, regulation, regulatory rule and good practice, whether originating from the UK or elsewhere;
-)] In order to assist with investigations (including criminal investigations) carried out by the police and other competent authorities;

In this respect your personal data may be shared with the following:

-)] Our advisers (such as lawyers or accountants) where it is necessary to obtain their advice or assistance;
-)] Tax authorities including, but not limited to, HMRC and the US Internal Revenue Service;
-)] Relevant regulators or law enforcement agencies.

Retention of your data

We will retain your personal data for a period of seven years following the date on which you cease to use the Investor Portal, unless that personal data is required to be retained for a longer period by reference to an applicable law or regulation. However, where there is a relationship between you and us after that time, we will retain such of your personal data as is necessary, and for such reasonable additional period, in order to maintain that relationship.

Please see our section on **Cookies** for further information on how long cookie data is retained for.

Your rights

Prior to 25 May 2018, you have the following rights:

-)] To obtain access to, and copies of, the personal data we hold about you;
-)] To require that we cease processing your personal data if the processing is causing you damage or distress;
-)] To require us not to send you marketing communications;

Once GDPR comes into force, from 25 May 2018 you will also have the following additional rights:

-)] To require us to erase your personal data;
-)] To require us to restrict our data processing activities in relation to your personal data;
-)] To receive from us the personal data we hold about you, which you have provided to us, in a reasonable format specified by you, including for the purpose of transmitting that personal data to another data controller; and
-)] To require us to correct the personal data we hold about you if it is incorrect.

Please note that the above rights are not absolute, and requests may be refused where exceptions apply.

If you are not satisfied with how your personal data is used by us you can make a complaint to the Information Commissioner (www.ico.org.uk).

Security

We employ security measures to protect your personal data from access by unauthorised persons and against unlawful processing, accidental loss, destruction and damage. However, the transmission of information using Wi-Fi networks and cellular data networks may not be completely secure. Although we will use appropriate measures to protect your personal data, we cannot guarantee the security of data transmitted to us using the Site and any such transmission is made at your own risk, however we shall notify you if there is a breach which is likely to result in a high risk to your rights and freedoms.

Cookies

The Site uses cookies. These cookies are used for the purpose of improving the experience of the Site by remembering your preferences, the places you have visited, and other information that you have provided to us.

A "cookie" is a small piece of information sent by a server and stored by the Site on the hard drive of your mobile device. When you use the Site, you will be asked to confirm whether you agree to the Site using cookies, and if you accept we will store cookies on your device. You may usually change the settings of the device used to access the Site to prevent this. However, if you select this setting or if you reject our request to use cookies, you may be unable to access certain parts of the Site and/or you may not be able to benefit from the full functionality of the Site.

We use the following cookies for the following purposes:

Cookie	Name	Purpose
__(underscore/underscore)utma __utmb __utmc __utmt __utmz	Analytics Cookie	We use analytics cookies to collect information about how a user uses the Site, such as where they have come to the Site from and which pages of the Site they have visited. We use this information to help us improve the Site. These cookies only work when active. The cookies are cleared only when a user manually clears their cache.
asp.net_sessionid cookie	Session ID cookie	This is a temporary cookie file which is erased when the user closes their web browser. When the user restarts their browser and revisits the Site, the Site will not recognise the user. The purpose of this cookie is to identify whether a user has logged into the Site, the site has to remember they have logged in (i.e. like a name tag when you enter a building so security know you are in the building).
	Cookie agreement	The purpose of this cookie is to identify whether the user has accepted the use of cookies so as to enable the Site to reload the page accordingly.

Other than the Session ID cookie (which is cleared when a user logs off the Site), the cookies we use will not expire and will remain on the device you use to access the Site until cleared directly by you through your browser.

Most web browsers allow some control of most cookies through the browser settings. To find out more about cookies, including how to see what cookies have been set and how to manage and delete them, visit www.aboutcookies.org or www.allaboutcookies.org.