

Privacy Notice

1. Introduction

This Privacy Notice explains how Blackwood Capital Group (UK) Limited of 5 Welbeck Street, Marylebone, London W1G 9YQ (“Blackwood”, “we” or “us”) utilises the personal information that we collect or generate both in relation to this website and the services we provide.

The Data Protection Act 1998, the EU General Data Protection Regulation (Regulation (EU) 2016/679, “GDPR”) and other laws protecting personal data (the “DP Laws”) regulate the way in which Personal Data (as defined in paragraph 2 below) may be processed, including but not limited to the way in which it is collected, handled, stored, disclosed and otherwise “processed” to comply with data protection standards and DP Laws.

For the purposes of applicable DP Laws, Blackwood is considered to be a data controller. This means we are primarily responsible for making decisions about how and why we process your personal data as more particularly described in paragraphs 5 and 6 below.

Blackwood is committed to protecting the privacy and security of your Personal Data. This Privacy Notice explains how and the purposes for which your Personal Data is processed by us in the course of carrying on our regulatory and other business activities.

2. What is Personal Data?

“Personal Data” is data which by itself or with other data available to us can be used to identify you. As set out in the DP Laws, this means any data which relates to a living individual who can be identified from that data or from that data and other information which is in the possession of, or is likely to come into our possession (or that of our representatives or service providers). In addition to factual information, it includes any expression of opinion about an individual and any indication of the intentions of Blackwood or any other person in respect of an individual.

“Sensitive Personal Data” means any personal data relating to your racial or ethnic origin; your political opinions; your religious (or similar) beliefs; your physical or mental health condition; details of criminal offences or criminal convictions (including the commission or alleged commission of any offence, any proceedings for any offence committed or alleged to have been committed and the disposal of such proceedings or the sentence of any court in such proceedings) and your genetic and biometric data.

3. Products and services provided

This Privacy Notice concerns the following categories of information that we collect about you when providing or preparing to provide our services:

- 3.1. information concerning you as a director or officer of a company or as an individual shareholder or investor in a company, (a “Corporate Individual”);
- 3.2. information concerning you as a member of a management team proposing to engage in any transaction (“Management Member”);
- 3.3. information concerning you as an individual member of an investment fund or fund manager (“Investment Individual”);
- 3.4. information about you received from any consultants and other professional advisers engaged in connection with the provision of our services; and
- 3.5. information about you received through our website <http://www.blackwoodcapital.com>.

4. Types of Personal Data collected

Many of the services offered by Blackwood require us to obtain Personal Data about you in order for us to be able to provide the services for which we have been engaged by you or a connected person. The Personal Data about you that may be collected and processed includes, according to the nature of your relationship with us, the following:

- your name and contact details such as address, telephone number(s) and email address(es);
- your nationality and passport number(s);
- your tax status and tax identification number (such as National Insurance Number);
- your history of employment;
- any directorships or officer roles held or previously held;
- your bank account details;
- information on income and personal wealth (including as necessary, the source of your personal wealth);
- information on investigations, litigation, court proceedings, civil liabilities or criminal convictions against you;
- where permitted, information received from credit reference agencies, fraud prevention agencies, sanctions screening providers and from other public sources such as Companies House;
- information on how and when you use our websites and links to them.

In addition, in order to provide our services, we may:

- collect Personal Data about other individuals, including in the case that our instructions relate to jointly owned property, the other joint owners of such property and in the case of any instruction given by a person acting under a power of attorney or other authority, the person who is the grantor of that power or authority. In the latter case you must have the consent or approval of the grantor of such power or authority to provide us with their Personal Data and share this Privacy Notice with them before doing so, including details of what you have agreed on their behalf;
- monitor and/or record your telephone calls and electronic transactions.

We will only collect and process your Sensitive Personal Data with your explicit consent or where the processing is specifically authorised by a regulatory body or required by DP Laws.

5. How we use your Personal Data

Your Personal Data may be stored and processed by us for the following purposes:

- conducting checks to verify your identity in accordance with legal and regulatory requirements;
- providing our services to you or any connected company of which you are an officer or employee or in which you are a shareholder;
- detecting and preventing financial crime including fraud and/or money laundering;
- screening for financial and other sanctions;
- statistical analysis and assessment;
- assessing compliance with applicable laws, rules and regulations as well as our internal policies and procedures;
- ensuring business policies are adhered to, e.g. policies relating to communications and security;
- external audits or compliance checks;
- the administration, maintenance and updating of databases storing Personal Data; and/or
- enforcing our legal rights.

6. The legal basis for processing your Personal Data

There are number of different bases on which we may lawfully collect and process your Personal Data under DP Laws, including:

6.1. Where you have provided your consent

In specific situations, we can collect and process your Personal Data with your consent. For example, when you request us to disclose your Personal Data to other people or organisations.

You are free at any time to change your mind and withdraw your consent as explained below. However, this may result in our being unable to provide certain services or limitations on the scope of our services to you or any connected person.

6.2. Contractual obligations

We will use your personal data to comply with various contractual obligations, including to manage and perform our obligations under any engagement, to assist you and respond to your requests, to update our records where your Personal Data changes and you notify us of such changes or to contact you about the service(s) we provide to you in your capacity as a Corporate Individual, Management Member or Investment Individual.

6.3. Legal and regulatory obligations

We may use your Personal Data to enable us to comply with various legal and regulatory obligations, including in the event that you exercise your rights under DP Laws, in order to verify your identity and carry out applicable 'know-your-customer' checks in accordance with applicable anti-money laundering laws and regulations. We are obliged to take all necessary steps in order to prevent and detect financial crime including money-laundering and the financing of terrorism. We also record and may monitor phone calls and electronic communications made or sent to or by us in order to comply with our legal and regulatory obligations.

6.4. Our legitimate interests

In specific situations, we may use your Personal Data to pursue our legitimate interests in a way which you might reasonably expect and which does not materially impact upon your rights, freedoms or interests. For example, we will use the information to understand your needs and interests, to communicate with you in order to provide you with information about Blackwood and for maintaining compliance with internal policies and procedures.

More generally, we may also use the contact details of persons who are business contacts of Blackwood to send them updates (by email, text message, telephone or post) concerning recent news or developments, forthcoming events and services that we think might be of interest.

Whilst we do not usually need your consent to send you promotional communications, where consent is needed, we will ask for this separately and clearly.

We will always treat your personal data with the utmost respect and never sell or share it with other organisations for marketing purposes.

You have the right to opt out of receiving promotional communications at any time by contacting us by email addressed to info@blackwoodcapital.com.

In addition to any recording of electronic communications that is either legally authorised or imposed or to which you have consented, we may record electronic communications with you for the purpose of ensuring the training and supervision of employees, improving the quality of our services and/or providing evidence of communications that took place through these electronic communications, including the content of such communications.

However we use your Personal Data we make sure that such usage complies with DP Laws. Further, we will ensure that your Personal Data is accessed only by employees of Blackwood that have a need to do so for the purposes described in this Privacy Notice.

7. Sharing your information with third parties

We may share your Personal Data with our group companies. We may also share your Personal Data outside of the Blackwood group for the following purposes:

- 7.1. with third party agents and contractors for the purposes of their providing services to us (for example, consultants, professional advisors and IT and communications providers). These third parties will be subject to appropriate data protection obligations and they will only use your Personal Data as described in this Privacy Notice;
- 7.2. to the extent required by law, for example if we are under a duty to disclose your Personal Data in order to comply with any legal obligation (including, without limitation, in order to comply with tax reporting requirements and disclosures to our regulators), or to establish, exercise or defend our legal rights;
- 7.3. if we sell our business or assets, in which case we may need to disclose your Personal Data to the prospective buyer for due diligence purposes. Usually the information will be anonymised, but this may not always be possible; and
- 7.4. if we are acquired by a third party, in which case the Personal Data held by us about you will be disclosed to the third party buyer in order that they may continue to provide you with the relevant service.

8. International Transfers

In certain circumstances, it may be necessary for us to transfer your Personal Data to another country. In case of international transfers originating from the European Economic Area (EEA), to a non-EEA country, where the European Commission has recognised a non-EEA country as providing an adequate level of data protection, your personal data will be transferred on this basis.

For transfers to non-EEA countries where the level of protection has not been recognised as adequate by the European Commission, we will either rely on a derogation applicable to the specific situation (e.g. if the transfer is necessary to be able to perform our services or carry out your instructions) or implement standard contractual clauses approved by the European Commission to ensure the protection of your personal data.

9. Security and data retention

- 9.1. We have appropriate security measures to prevent your Personal Data from being accidentally lost, used or accessed unlawfully.
- 9.2. Access to Sensitive Personal Data is limited to those employees who need to it to perform their roles. Unauthorised use or disclosure of confidential client information by an employee of Blackwood is prohibited and may result in disciplinary measures.
- 9.3. The period for which your Personal Data is retained will vary and will be determined by the following criteria:
 - 9.3.1. the purpose for which we are using it – we will need to keep the data for as long as is necessary for that purpose; and
 - 9.3.2. legal obligations – laws or regulation may set a minimum period for which we have to keep your Personal Data.

We will not, however, retain your Personal Data for any longer than is necessary for the purposes set out in this notice. When it is no longer necessary to retain your Personal Data we will delete it or anonymise it.

10. Your rights

In all the above cases in which we collect, use or store your Personal Data, you have the following rights under DP Laws:

- 10.1. the right to obtain information regarding the processing of your Personal Data and access to the Personal Data which we hold about you;
- 10.2. the right to withdraw your consent to the 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 another

legitimate reason for doing so. For example, we may need to retain Personal Data to comply with a legal or regulatory obligation;

- 10.3. the right to request that we rectify your Personal Data if it is inaccurate or incomplete;
- 10.4. the right to request that we delete your Personal Data in certain circumstances. Please note that there may be circumstances where you ask us to delete your Personal Data but we are legally entitled or obligated to retain it;
- 10.5. the right to object to, or 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 or obligated to refuse your request; and
- 10.6. the right to lodge a complaint with the relevant data protection regulator if you think that any of your rights have been infringed by us.

For further information on each of those rights, including the circumstances in which they apply, please contact us or see the [Guidance from the UK Information Commissioner's Office \(ICO\) on individuals' rights under the General Data Protection Regulation](#).

You can exercise the rights referred to above by contacting us using the details listed in paragraph 12 below.

11. Changes to this Privacy Notice

We keep this Privacy Notice under regular review. We reserve the right to update this Privacy Notice at any time and we will advise you when any material changes to it are made.

12. Contact Information

If you have any questions or concerns about the processing of your Personal Data, or about this Privacy Notice, please contact our Compliance Officer by emailing info@blackwoodcapital.com or writing to the Compliance Officer, Blackwood Capital Group (UK) Limited, 5 Welbeck Street, Marylebone, London W1G 9YQ.

Our objective is to resolve privacy questions or concerns promptly and effectively. If you are not satisfied with the response you receive, The [General Data Protection Regulation](#) also gives you right to lodge a complaint with a supervisory authority, in particular in the European Union (or European Economic Area) state where you work, normally live or where any alleged infringement of data protection laws occurred. The supervisory authority in the UK is the Information Commissioner who may be contacted at <https://ico.org.uk/make-a-complaint/> or telephone: 0303 123 1113.