

FAIR PROCESSING NOTICE FOR INVESTORS

During the course of its activities, Parkwalk Advisors Ltd (the “**Company**”) will collect and process personal data (which may be held on paper, electronically or otherwise) about its investors (the “**Data Subjects**”). The Company is the ‘controller’ of the personal data and recognises the need to treat any data in an appropriate and lawful manner in accordance with the Data Protection Act 2018 and the General Data Protection Regulation (“**GDPR**”) and, in particular, to protect the security and privacy of data relating to the Data Subjects. The purpose of this fair processing notice is to set out, for the benefit of the Data Subjects, how the Company will handle the personal data collected.

Information the Company collects from Data Subjects and how it uses it

The Company is in the process of implementing:

- a new client record management system with Exact (the “**CRM System**”); and
- a new IFA and client portal with Lab Lateral (the “**Portal**”).

The CRM System is an internal central database of the Company’s investments and investors along with a record of the IFA that introduced each investor (if relevant) and relevant fees relating to each transaction and holding. The CRM System will assist the Company with the processing of applications and client enquiries and is designed to cater for the regulatory and statutory requirements for recording and processing EIS investments. Following the implementation of the CRM System, the personal data held by the Company will be stored on Exact’s servers located within the UK.

The Portal is an external portal system that will allow the Company’s clients (and their IFAs, if relevant) to access information about their investments, including fees relating to each transaction and holding, and valuations for each investment. The Portal will assist the Company with client enquiries and the accessibility of investment data for clients. Following the implementation of the Portal, the personal data held by the Company will be hosted on Microsoft servers located within the UK.

What data does the Company hold about its investors?	What are the purposes of the processing?	What is the legal basis for the processing?	Does the Company share the data with anyone else within the UK or to a third country?
Personal contact details including name, personal email address, address and phone number	To ensure the Company has contact details for investors on its records.	Processing is necessary for the purposes of the legitimate interests pursued by the Company.	The Company may share personal details with any custodian that it appoints from time to time (the “ Custodian ”). In addition, certain personal details may be shared with HM Revenue & Customs

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			<p>in documents required for EIS relief applications.</p> <p>Occasionally, and only where the Company has received advance written confirmation from investors that personal information can be so shared, information is shared with an investor's IFA, accountant and/or lawyer upon request.</p>
Nationality and citizenship information including national tax identification numbers	To ensure the Company has details for investors on its records that must be supplied to the Custodian for the purposes of MiFID II.	Processing is necessary for the purposes of the legitimate interests pursued by the Company.	The Company may share personal details with the Custodian and with an investor's IFA (if applicable).
Identification information including passport and driving licence	To ensure the Company is able to comply with its anti-money laundering obligations.	Processing is necessary for the purposes of the legitimate interests pursued by the Company.	The Company may share personal details with the Custodian and with an investor's IFA (if applicable).
Bank account details	To enable the Company to transfer any monies received during the life of an investment or upon an exit.	Processing is necessary for the performance of the investment agreement between the Company and the investor.	The Company may share personal details with any custodian that it appoints from time to time.
Any other processing of sensitive personal data	To be confirmed in advance of processing.	Explicit consent will be required from investors.	To be confirmed to investors in advance of processing.

How long will the Company keep my personal data for?

The Company will not keep your personal data for longer than is necessary for the purpose. This means that the Company will use reasonable endeavours to ensure that your data will be destroyed or erased from the Company's systems when it is no longer required. The retention period for personal data will vary according to the type of record.

The Company will retain its records in relation to investors as follows:

Type of investor record	Retention period
Personal contact details	While the investor remains invested in any fund managed by the Company or holds any beneficial interest in any investee company through any Parkwalk fund and for seven years afterwards.
Nationality and citizenship information including national tax identification numbers	While the investor remains invested in any fund managed by the Company or holds any beneficial interest in any investee company through any Parkwalk fund and for seven years afterwards.
Bank account details	While the investor remains invested in any fund managed by the Company or holds any beneficial interest in any investee company through any Parkwalk fund and for a short period thereafter to deal with any final payments which may be due.

What are Data Subjects' rights in relation to their personal data?

It is important that the personal data which we hold about Data Subjects is accurate and up to date. Data Subjects should notify the Company of any changes. If at any point a Data Subject wishes to see what personal data the Company holds relating about them, he/she can request that this is disclosed to them. If a Data Subject believes that the information the Company holds relating to him/her is incorrect, he/she can in certain circumstances have it corrected or deleted: more details are provided below. If a Data Subject wish to raise a complaint on how the Company has handled his/her personal data, he/she should contact the Company's Chief Compliance Officer.

If a Data Subject is not satisfied with the Company's response to any complaint or belief that the Company is not processing his/her personal data in accordance with the law, a Data Subject can raise a complaint with the Information Commissioner's Office.

A detailed summary of Data Subjects' rights under the GDPR is set out in the annex to this notice.

Questions?

If you have any queries on this notice, please contact the Company's Chief Compliance Officer.

May 2018

ANNEX

Rights for individuals under the GDPR: A Summary

What is the right?	What does this mean?
The right to be informed	This covers the obligation to provide fair processing information to individuals (usually through a fair processing notice). It emphasises the need for transparency on how personal data is used.
The right of access	<p>Individuals have the right to obtain (via a subject access request):</p> <ul style="list-style-type: none"> confirmation that their data is being processed; access to their personal data. <p>Information must be provided to individuals within one month of receipt of the request (unless the request(s) are complex/numerous, in which case this timeline may be extended by a further two months).</p>
The right of rectification	<p>Individuals are entitled to have personal data rectified if it is inaccurate or incomplete.</p> <p>Where a request has been made, a response must be provided within one month. This can be extended by two months where the request is particularly complex.</p>
The right to erasure	<p>This right allows individuals to request the deletion or removal of personal data where there is no compelling reason for its continued processing.</p> <p>This right is sometimes known as the right to be forgotten but it does not provide an absolute 'right to be forgotten'. It provides the right to erasure in certain circumstances.</p>
The right to restrict processing	<p>Individuals have the right to block the processing of personal data in certain situations. Data processors must restrict processing in the following situations:</p> <ul style="list-style-type: none"> where an individual consents, the accuracy of the personal data; where an individual has objected to the processing and the organisation is considering whether it has legitimate grounds to override the objection; where processing is unlawful and the individual requests restriction rather than erasure; and if a data processor no longer needs the data but the individual needs the data to establish, exercise or defend a legal claim.
The right to data portability	This right allows individuals to obtain and reuse their personal data for their own purposes across different services. It allows them to move, copy or transfer personal data easily in a safe and secure way.
The right to object	<p>Individuals can object to:</p> <ul style="list-style-type: none"> processing based on legitimate interests or the performance of a task in the public interest/exercise of official authority (including profiling); direct marketing (including profiling); and processing for the purposes of scientific/historical research and statistics.
The right in relation to automated decision making and profiling	The GDPR provides safeguards for individuals against the risk that a potentially damaging decision is taken without human intervention.