

STRIDE VENTURES LTD PRIVACY NOTICE

Stride Ventures Ltd (“we”, “us”, “our”) are committed to protecting and respecting your privacy. This privacy notice tells you how we collect and process your personal data, the purposes for which we use and share it, the lawful bases for such purposes, and explains how we share and retain your data.

This privacy notice applies to our investors and portfolio companies (to the extent we process any personal data in connection with such investors and portfolio companies). This privacy notice is directed at investors who are individuals, and/or the individual directors, officers, employees and/or owners (“you”) whose personal data is collected and processed in connections with our dealings with investors and portfolio companies.

“**Personal data**” means any information relating to you (an identifiable individual), such as your name, any identification number, location data, any online, but does not include data rendered anonymous in such a manner that you are no longer identifiable.

We are the “controller” of your personal data under UK data protection laws, as we are responsible for deciding how to hold and use personal data about you, and may process your personal data itself or through another person such as persons acting as a “processor” on our behalf.

The following sections provide further information in relation to our processing of your personal data.

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1. CONTACT DETAILS

- 1.1 If you have any questions about this privacy notice, its contents, or your rights under the UK GDPR you can contact us at 9-11 New Broadway, London, England, W5 5AW.

2. WHAT INFORMATION WE COLLECT, USE, AND WHY

- 2.1 We may collect and use the following types of personal data from you:

- 2.1.1 **Identification Data:** Full name, title, gender, marital status, date of birth passport number, driving license number, national identification number, signature.

- 2.1.2 **Contact Data:** Personal address, telephone number, email address.
- 2.1.3 **'Know your client' (KYC Data):** Personal data needed for KYC checks such as passport or other Identification data and regulatory status.
- 2.1.4 **Electronic Monitoring Data:** To the extent permitted by applicable law, we may record and monitor your electronic communications with us, including telephone conversations, email, instant messaging and any other electronic communications.
- 2.1.5 **Financial Data:** Account number, client reference number; account statements, investment history and in some cases, credit ratings.
- 2.1.6 **Tax Details:** Social security number, national insurance number, and/ or tax file number.
- 2.1.7 **Marketing, Behavioural and Communications Data:** Marketing and communication preferences; information about your use of our websites, our portals and platforms.
- 2.1.8 **Professional Data:** Position/job title, business address, business telephone number business email address.
- 2.1.9 **Profile Data:** Username and password for our online services that you may have access to if we allow you to access our portal, investments made by you, services requested, marketing communications responded to survey responses.
- 2.1.10 **Services Data:** Payment details to and from you, details of services you have provided to us, or we have provided to you.
- 2.1.11 **Other Data** you provide in the course of your dealings with us or which we require you to provide so that we can provide you with our products and services, including any personal data you provide during phone and email communications.
- 2.2 In limited circumstances, we may also collect the following additional types of data to the extent necessary for our purposes set out below:
 - 2.2.1 **Criminal Convictions Data:** We may collect information about criminal convictions and offences, when legally required;
 - 2.2.2 **Political Data:** Data relating to your political affiliations, for us to determine whether you are a politically exposed person.

3. **PURPOSES AND LAWFUL BASES FOR PROCESSING**

- 3.1 Under UK data protection law, we must have a "lawful basis" for collecting and using your personal information.
- 3.2 The purposes for which we use your personal data and the relevant lawful bases we rely on for such purposes are set out in the table below.

Purpose	Data Categories	Lawful basis for processing
To undertake pre-investment steps, including without limitation to: - determine your eligibility to invest; - perform required due diligence; and - establish your investment preferences.	Identification Data Contact Data KYC Data Criminal Convictions Data Investment Preferences	Necessary for the purposes of entering into a contract with you. Compliance with applicable legal obligations. Legitimate interests in establishing your preferred investment strategies.
To carry out anti-money laundering checks and related actions considered appropriate to meet any legal obligations relating to the prevention of fraud, money laundering, terrorist financing, bribery, corruption, tax evasion and the provision of financial and other services to persons who may be subject to economic or trade sanctions, on an on-going basis, in accordance with the anti-money laundering procedures.	KYC Data Political Data Criminal Convictions Data	Compliance with applicable legal obligations. Necessary for the purposes of entering into a contract with you.
To undertake business development activities, including sending you direct marketing and promotional materials relating to our services or related products.	Contact Data Marketing, Behavioural and Communications Data Investment Preferences	Consent. Individuals can withdraw their consent and opt-out of receiving such messages at any time by using the opt-out mechanisms that may be available in the relevant messages, or by contacting us using the contact details in section 1 above.
To facilitate the opening of accounts, the management and administration of each investment and any related account on an on-going basis as	Identification Data Contact Data Financial Data Investment	The performance of a contract with you in order to provide our products and services to you. Legitimate interests in

Purpose	Data Categories	Lawful basis for processing
considered necessary or appropriate for the performance of a contract.	Preferences Professional Data Profile Data Services Data Other Data	complying with our contractual obligations and providing appropriate and relevant support and services to you.
To report tax related information to tax authorities.	Tax Details	Compliance with applicable legal obligations
To disclose information to parties such as the depositary, auditor, legal counsel and to monitor our compliance with legal obligations.	Electronic Monitoring Data Services Data Other Data	Compliance with applicable legal obligations
Monitoring and recording calls and other communications related to the processing and verification of instructions, quality and business analysis, compliance with applicable laws and regulations.	Electronic Monitoring Data Services Data Other Data	Compliance with applicable legal obligations Legitimate interests in ensuring we are conducting our business in a proper manner
To facilitate investments, transactions and to provide our products and Services	Identification Data Contact Data Financial Data Investment Preferences Professional Data Profile Data Services Data Other Data	Performance of contract Legitimate interests in ensuring we are conducting our business in a proper manner
To contact you in relation to your account, investments or any other queries or concerns you may have, or if we need to	Contact Data Account Data	Legitimate interests to manage client relationships and inform clients of important information

Purpose	Data Categories	Lawful basis for processing
notify you of changes to this privacy notice or our terms and conditions.		related to their investments or our services and so that we can provide good customer service and respond to client's queries, complaints or claims appropriately

3.3 Where we rely on legitimate interests as the lawful basis for processing your personal data, we ensure that our processing is necessary for our legitimate interests and that our interests are not outweighed by your fundamental rights and freedoms. If you would like more information on how we have come to this conclusion please contact us using the contact details at the top of this privacy notice.

4. **WHERE WE GET PERSONAL DATA FROM**

4.1 We usually collect personal data directly from you when you provide it to us when communicating or transacting with us.

4.2 In addition we may receive your personal data from the following third parties:

4.2.1 Publicly available sources

1.1.1 Credit reference agencies

1.1.2 Your legal, financial, tax or other professional advisors

1.1.3 Your bank

4.2.2 Suppliers, introducers, or other intermediaries and service providers who may collect your data on our behalf.

5. **WHO WE SHARE INFORMATION WITH**

5.1 We may share your personal data with a third party if required by law, if necessary to perform our contract with you, or if we have another legitimate interest to do so.

5.2 In particular, we may share your personal data with:

5.2.1 **Processors:** including Google Cloud who stores data on our behalf.

5.2.2 **Stride Venture Group:** our group companies for group compliance and reporting purposes.

5.2.3 Others we share your personal data with:

(a) Our fund administrator and fund manager (regulated by Financial Conducts Authority (FCA)) for compliance and reporting purposes

(b) Professional or legal advisors for professional or legal advice

- (c) Financial or fraud investigation authorities for compliance and reporting purposes
- (d) Relevant regulatory authorities for compliance and reporting purposes
- (e) External auditors or inspectors for compliance and reporting purposes
- (f) Suppliers and service providers for the purposes of providing our services

5.3 We may also share your personal data with third parties in the context of a possible sale or restructuring of the Stride Venture Group. We may also need to share your personal data with a regulator or to otherwise comply with applicable law or judicial process or if it reasonably believes that disclosure is necessary to protect its rights and/or to comply with judicial or regulatory proceedings, a court order or other legal process.

6. **SHARING INFORMATION OUTSIDE THE UK**

6.1 We only send your personal data outside the UK to:

- 6.1.1 Follow your instructions;
- 6.1.2 Comply with a legal duty; or
- 6.1.3 Where necessary, we may transfer personal information to our Group companies that are based outside of the UK and located in India.

6.2 If we transfer your personal data outside the UK, we will implement one of the following safeguards (accompanied by a transfer risk assessment):

6.2.1 Transfers to a non-EEA country that has been deemed to provide an adequate level of protection for personal information by the European Commission. For further details, see [*European Commission: Adequacy of the protection of personal information in non-EU countries*](#). (The UK has published “adequacy regulations” in relation to countries within the EEA and some countries outside of the EEA, which means that these countries are considered under UK data protection law, to provide an adequate level of protection for personal data. (see the [*ICO’s guidance on international transfers for a list of countries deemed adequate*](#).)

6.2.2 Put in place a contract with the recipient that means they must protect it to the equivalent standards as the UK including [*standard contractual clauses for data transfers between EU and non-EU countries*](#); the [*UK Information Commissioner’s International Data Transfer Agreement / Addendum*](#) and any other appropriate safeguard in place from time to time.

6.3 For further information or to obtain a copy of the appropriate safeguard for any of the transfers below, please contact us using the contact information provided above.

7. **HOW LONG WE KEEP INFORMATION**

7.1 We will retain your personal data for as long as necessary to fulfil the purposes for which it was collected, including for the purposes of satisfying any legal, regulatory, accounting or reporting requirements and our legitimate interests in maintaining such personal data as part of our records. This will normally include any period during which we are dealing or expect

to deal with you and for a suitable period thereafter based on what we consider reasonable and necessary for internal record-keeping purposes. In doing this we will have regard to the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether those purposes can be achieved through other means, and the applicable legal requirements.

- 7.2 Once we no longer require your personal data for the purposes for which it was collected (and do not otherwise need to retain it to comply with legal and record keeping obligations), we will securely destroy your personal data in accordance with applicable laws and regulations.

8. YOUR DATA PROTECTION RIGHTS

- 8.1 You can find out more about your data protection rights and the exemptions which may apply on the Information Commissioner ("ICO")'s website (linked in the 'How to Complain' section below):

8.1.1 **Your right of access** - You have the right to ask us for copies of your personal information. You can request other information such as details about where we get personal information from and who we share personal information with. There are some exemptions which means you may not receive all the information you ask for.

8.1.2 **Your right to rectification** - You have the right to ask us to correct or delete personal information you think is inaccurate or incomplete.

8.1.3 **Your right to erasure** - You have the right to ask us to delete your personal information.

8.1.4 **Your right to restriction of processing** - You have the right to ask us to limit how we can use your personal information.

8.1.5 **Your right to object to processing** - You have the right to object to the processing of your personal data.

8.1.6 **Your right to data portability** - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you.

8.1.7 **Your right to withdraw consent** – When we use consent as our lawful basis you have the right to withdraw your consent at any time.

- 8.2 If you make a request, we will respond to you without undue delay and in any event within one month.

- 8.3 To make a data protection rights request, please contact us using the contact details at the top of this privacy notice.

9. HOW TO COMPLAIN

- 9.1 If you have any concerns about our use of your personal data, you can make a complaint to us using the contact details at the top of this privacy notice.

9.2 If you remain unhappy with how we've used your data after raising a complaint with us, you can also complain to the ICO.

9.3 The ICO's address:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Helpline number: 0303 123 1113

Website: <https://www.ico.org.uk/make-a-complaint>

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