

Privacy Notice

Northfin Ltd

Version 1.0 – June 2025

This Privacy Notice explains how Northfin Ltd (“Northfin”, “we”, “our” or “us”) collects, uses, and protects your personal data in connection with our investment activities, including through our investor onboarding platform (currently hosted by Agora RE).

We are committed to protecting your privacy and ensuring that your personal data is handled responsibly and in compliance with applicable data protection laws, including the UK General Data Protection Regulation (“UK GDPR”).

1. Who We Are

Northfin Ltd is a private limited company incorporated in England and Wales with its registered office at [insert company address]. We act as the controller of your personal data when you engage with our investment services.

2. What Personal Data We Collect

We may collect and process the following categories of personal data:

- **Identification information** – name, date of birth, nationality, photo ID, signature
- **Contact details** – residential address, email address, telephone number
- **Verification and compliance data** – source of funds, source of wealth, tax residency, proof of address
- **Financial information** – investment profile, bank account details, transaction history
- **Investor classification information** – declarations, self-certification forms, supporting documents
- **Electronic interaction data** – IP address, browser/device details, submission timestamps (via onboarding platform)

We may also process information about your corporate or trust structure where you invest through a legal entity.

3. How We Collect Your Data

Your personal data is primarily collected:

- Directly from you during the investor onboarding process (via KYC/AML and classification forms)
- Through our third-party onboarding and signing platform (currently Agora RE)
- From publicly available sources (e.g., Companies House, sanctions lists)

- From identity verification and compliance service providers, where applicable

4. Purposes for Processing Your Data

We process your personal data for the following purposes:

- To assess your eligibility to invest in our products
- To comply with legal and regulatory obligations, including anti-money laundering (AML), counter-terrorist financing, and tax reporting requirements
- To execute and manage your investment transactions
- To maintain accurate investor records
- To manage investor communications, including performance updates and transaction notices
- To investigate fraud, prevent misuse of our services, and ensure compliance with internal controls

5. Legal Basis for Processing

We rely on the following legal bases under the UK GDPR:

- **Contractual necessity** – to take steps at your request before entering into an agreement and to perform our obligations under the terms of business and investment documentation
- **Legal obligation** – to comply with applicable laws, including financial services regulations, KYC/AML laws, and tax reporting
- **Legitimate interests** – to manage our business operations, including risk monitoring, investor communications, and improvement of service delivery
- **Consent** – in limited cases where required (e.g., for direct marketing, if applicable)

6. Sharing Your Data

We may share your data with:

- Our third-party service providers (including KYC/AML verification providers and the onboarding platform provider, Agora RE)
- Financial institutions and payment service providers, as required for transaction processing
- Professional advisers (legal, compliance, audit)
- Regulatory and tax authorities (e.g., HMRC, FCA), where required

- Lenders, syndication partners, or counterparties, where necessary to document or administer your investment participation

Where such parties are located outside the UK, we ensure appropriate safeguards are in place under applicable data protection law, including, where relevant, standard contractual clauses approved by the ICO.

Agora RE and its affiliated sub-processors may host data on servers located outside the UK, including in Israel. We ensure that such transfers are subject to appropriate protections.

7. Data Retention

We retain personal data only for as long as necessary to fulfil the purposes outlined in this notice and to comply with our legal and regulatory obligations. Typically, this will be for up to six to ten years after the end of your relationship with us, or longer if required under law or for ongoing legal proceedings.

8. Security Measures

We implement appropriate technical and organisational measures to protect personal data from unauthorised access, loss, misuse, or alteration. These measures include secure document management, access restrictions, encryption, and periodic data reviews.

9. Your Rights

Subject to applicable law, you have the following rights in respect of your personal data:

- Access – to request a copy of the personal data we hold about you
- Rectification – to correct inaccurate or incomplete data
- Erasure – to request deletion of your data in certain circumstances
- Restriction – to limit our use of your data under certain conditions
- Objection – to object to processing where we rely on legitimate interests
- Data portability – to receive your data in a structured format where applicable
- Withdraw consent – where we rely on your consent (e.g. for marketing), you may withdraw it at any time

You may also lodge a complaint with the UK Information Commissioner's Office (www.ico.org.uk) if you believe your data has been mishandled.

10. Contact Us

If you have any questions about this Privacy Notice or wish to exercise your data rights, please contact:

Northfin Ltd

71-75 Shelton Street, Covent Garden, London, United Kingdom, WC2H 9JQ

Email: nh@northfin.co.uk