

PRIVACY NOTICE

Version 2.0

Updated on March 7, 2022

Hanover Investors is committed to protecting the privacy and security of your personal information.

This privacy notice describes how we collect and use personal information about you through this website, and during and after your relationship with us, in accordance with the UK General Data Protection Regulation (UKGDPR) and EU General Data Protection Regulation (EUGDPR); together referred to as **Data Protection Legislations**.

It applies to all Hanover's current and former investors and/or applicants, and prospective investors.

1. WHAT IS THE PURPOSE OF THIS DOCUMENT?

This privacy notice aims to give you information on how Hanover collects and processes your personal data through your use of this website, including any data you may provide through this website, and during our relationship with you as:

- (i) Prospective investors
- (ii) Applicants to any of our existing funds
- (iii) Current and former investors of any of our funds.

This website is not intended for children and we do not knowingly collect data relating to children.

Hanover Investors Management LLP is authorised and regulated by the UK Financial Conduct Authority. Hanover Investors Management LLP is made up of different legal entities. This privacy notice is issued on behalf of the Hanover Investors Group so when we mention "Hanover", "we", "us" or "our" in this privacy notice, we are referring to the relevant company in the Hanover Group responsible for processing your data. We will let you know which entity will be the controller for your data when you apply for any product or service with us.

If you are visiting our website or you are a prospective investor, the Data Controller is Hanover Investors Management LLP, except otherwise communicated to you in writing.

If you are an applicant, existing or former investor to any of our funds, the Data Controller(s) shall be parties identified in your Subscription Agreement. This notice does not form part of any subscription agreement. We may update this notice at any time.

The Data Controllers are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this privacy notice.

It is important that you read this notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information.

2. DATA PROTECTION PRINCIPLES

We will comply with applicable Data Protection Legislations. This says that the personal information we hold about you must be:

Used lawfully, fairly and in a transparent way.

Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.

Relevant to the purposes we have told you about and limited only to those purposes.

Accurate and kept up to date.

Kept only as long as necessary for the purposes we have told you about.

Kept securely.

3. THE KIND OF INFORMATION WE COLLECT ABOUT YOU

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes first name, maiden name, last name, marital status, title, date of birth and gender, copy of passport, driving license, and national ID card, beneficiary ownership, politically exposed person's details.
- **Contact Data** includes billing address, postal address, email address and telephone/fax numbers.
- **Financial Data** includes bank account, tax residency, tax identification number and tax status information.
- **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us.
- **KYC Data** includes details disclosed through Anti-Money Laundering ("AML") forms, CRS/FACTA forms, specific country-based tax forms that the Data Controllers are required to collect under the applicable law.
- **Profile Data** includes subscriptions or orders made by you, your interests, preferences, feedback and survey responses. Also it includes details concerning your attitude to investment risk. It might include lifestyle information such as hobbies and interests.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use and share [Aggregated Data](#) such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

4. HOW IS YOUR PERSONAL INFORMATION COLLECTED?

We use different methods to collect data from and about you including through:

Direct interactions.

You may give us your Personal Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:

- apply for our products or services;
- commit to / invest in our funds;
- request marketing to be sent to you;
- give us some feedback.

Third parties or publicly available sources.

We may receive personal data about you from various third parties and public sources as set out below:

- Social media such as LinkedIn
- Relevant Data in the public domain (Corporate Websites)
- Referrals from existing customer/partners
- Dedicated capital market data providers like Pitchbook
- Information from external data providers in relation to potential target clients
- Analytics providers such as Google, MonsterInsights and Albacross

Automated technologies or interactions.

As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies.

5. HOW WE WILL USE INFORMATION ABOUT YOU

We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances:

Where we need to perform the contract we have entered into with you.

Where we need to comply with a legal obligation.

Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

We may also use your personal information in the following situations, which are likely to be rare:

Where we need to protect your interests (or someone else's interests).

Where it is needed in the public interest or for official purposes.

Situations in which we will use your personal information

We need all the categories of information in the list above (see [Paragraph](#)) primarily to allow us to perform our contract with you and to enable us to comply with legal obligations. In some cases, we may use your personal information to pursue legitimate interests of our own or those of third parties, provided your interests and fundamental rights do not override those interests.

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
Processing the application made pursuant to the Subscription Agreement and, if applicable, the applicant's admission to the relevant Fund;	(a) Identity Data (b) Contact Data (c) Financial Data	Performance of a contract with you Necessary to comply with a legal obligation
Providing services to and managing the affairs of the relevant Fund (including the acquisition and disposal of investments, the arranging of any financing for the relevant Fund and arranging for the preparation and auditing of any relevant Fund accounts, statements or reports);	(d) Transaction Data (e) KYC Data	
Maintaining records and correspondence relating to the applicant's participation in the relevant Fund;		
Detecting and preventing crime (including money-laundering);		
Complying with our respective obligations under the Partnership Agreement and/or Shareholders' Agreement and/or Management Agreement (as applicable and as defined the Subscription agreement).		
To make offers, suggestions and recommendations to you about similar goods or services that may be of interest to you	(a) Identity (b) Contact (c) Profile	Necessary for our legitimate interests (to develop our products/services and grow our business)
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)
		Necessary to comply with a legal obligation

6. PROMOTIONAL OFFERS FROM US

We may use your Identity, Contact, Usage and Profile Data to offer further investments which may be of interest to you. You will receive marketing communications from us if you have requested information from us or invested in a Hanover fund.

7. OPTING OUT

You can ask us to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of an investment, service experience or other transactions.

8. COOKIES

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see our Cookie Policy.

[If you fail to provide personal information](#)

If you fail to provide certain information when requested, we may not be able to perform the contract we have entered into with you (such as completing the subscription agreement or providing a benefit), or we may be prevented from complying with our legal obligations (AML and FACTA compliance), and/or processing your request.

[Change of purpose](#)

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

9. DATA SHARING

We may have to share your data with third parties, including third-party service providers and other entities in the group.

We require third parties to respect the security of your data and to treat it in accordance with the law. We may transfer your personal information outside the UK or the EEA.

If we do, you can expect a similar degree of protection in respect of your personal information.

[Why might you share my personal information with third parties?](#)

We will share your personal information with third parties where required by law, where it is necessary to administer the

relationship with you or where we have another legitimate interest in doing so.

Which third-party service providers process my personal information?

The Data Controller(s) may disclose your Personal Data to their respective affiliates, sub-contractors and certain third-party services providers (including finance providers, the partnership's bankers, any administrator of the partnership and any custodian of the partnership's assets), as well as to any parallel vehicle, feeder vehicle and Investment Holding Vehicle;

How secure is my information with third-party service providers and other entities in our group?

All our third-party service providers and other entities in the group are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

When might you share my personal information with other entities in the group?

We will share your personal information with other entities in our group to provide the services, as part of our regular reporting activities on company performance, in the context of a business reorganisation or group restructuring exercise, for system maintenance support and hosting of data.

What about other third parties?

We may share your personal information with other third parties, for example in the context of the possible sale or restructuring of the business. We may also need to share your personal information with a regulator or to otherwise comply with the law.

Transferring information outside the UK or the EEA

The Personal Data may be transferred outside the United Kingdom or the European Economic Area to a third country that does not provide the same level of protection of data as that provided for in the United Kingdom or the European Economic Area (and where such transfers are made, the Data Controller will ensure that appropriate safeguards are in place in relation to such data and that details regarding those safeguards may be made available on request by the Applicant);

10. DATA SECURITY

We have put in place measures to protect the security of your information.

Third parties will only process your personal information on our instructions and where they have agreed to treat the information confidentially and to keep it secure.

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

11. DATA RETENTION

How long will you use my information for?

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, reporting or compliance requirements. To determine the appropriate retention period for personal data, we consider 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 we can achieve those purposes through other means, and the applicable legal requirements. In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you.

12. RIGHTS OF ACCESS, CORRECTION, ERASURE, AND RESTRICTION YOUR DUTY TO INFORM US OF CHANGES

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your relationship with us.

Your rights in connection with personal information

Under certain circumstances, by law you have the right to:

- **Request access to your personal information** (commonly known as a “data subject access request”). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- **Request correction of the personal information that we hold about you.** This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure of your personal information.** This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below). Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- **Object to processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground.** You also have the right to object where we are processing your personal information for direct marketing purposes.
- **Request the restriction of processing of your personal information.** This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your personal information to another party.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact compliance@hanoverinv.com in writing.

No fee usually required

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access the

information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

13. RIGHT TO WITHDRAW CONSENT

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact compliance@hanoverinv.com. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

14. CONTACT US

We have appointed a Data Privacy Manager to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please contact:

Hanover Investors Management LLP
25 Savile Row
London W1S 2ER
Tel: +44 (0) 20 7766 8400

Or

Hanover Investors Management (Malta) Ltd
35 Tigne Place, Tigne Street
Sliema 3173
Malta
Tel: +356 8006 5155

Email: compliance@hanoverinv.com
FAO: Data Privacy Manager

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk) or the Office of the Information and Data Protection Commissioner in Malta (<https://idpc.org.mt>). We would, however, appreciate the chance to deal with your concerns before you approach the either body so please contact us in the first instance.

15. CHANGES TO THIS PRIVACY NOTICE

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.