

EVERYMIND LIMITED

PRIVACY NOTICE

About Us and the Purpose of This Notice

Everymind Limited (“Everymind”, “we”, “us”, “our” and “ours”) is a consultancy that provides professional, financial and accounting services to private equity partnerships and their portfolio businesses. We are registered in England and Wales as a company under number: 047071052 and our registered office is at 2-4 Packhorse Road, Gerrards Cross, Buckinghamshire SL9 8QE.

This notice will tell you how we look after your personal data, will tell you about your privacy rights, and about our compliance with and your protections under Data Protection Legislation.

In this notice “Data Protection Legislation” means the Data Protection Act 2018 (as amended by the Data Protection, Privacy and Electronic Communications (Amendments etc.) (EU Exit) Regulations 2019 which merge the previous requirements of the Data Protection Act with the requirements of the General Data Protection Regulation ((EU) 2016/679)) and any other laws and regulations in the UK applicable to the processing of personal data.

For the purpose of the Data Protection Legislation and this notice, we are the “data controller”. This means that we are responsible for deciding how we hold and use personal data about you. We are required under the Data Protection Legislation to notify you of the information contained in this privacy notice.

We have appointed a Data Protection Officer. Our Data Protection Officer is our Data Protection Point of Contact and is responsible for assisting with enquiries in relation to this privacy notice or our treatment of your personal data. Should you wish to contact our Data Protection Point of Contact you can do so using the contact details noted in the Contact Us paragraph, below.

Personal Information: Business Contacts

If you have interacted with Everymind, whether through email, meeting someone from Everymind, or otherwise, we may keep limited amounts of your personal information. This might include your name, job title, employer organisation, employment history and contact details. We do this for the purposes of:

1. Providing business updates;
2. Maintaining a list of contacts;
3. Asking you along to events or organising meetings between you and Everymind’s representatives.

In accordance with Data Protection Laws, our legal basis for collecting and storing such personal information is that such processing is necessary for our legitimate interests in running and promoting our business. Whilst Everymind does not routinely obtain consent as the legal basis upon which it stores and processes personal data, it will, if necessary, and to the extent required by Data Protection Laws, obtain the consent of the data subject to hold and process personal information. If consent is provided, it can be withdrawn by the data subject at any

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time. The length of time such personal information will be held by Everymind will depend on why it was collected initially. The requirements of applicable laws or regulations will also affect this.

Personal Information: Private Equity Clients

The information we hold about you may include your personal details (such as your name, telephone number and email address), our correspondence and communications with you and details of any services you have received from us.

In addition, Everymind may be required to obtain and hold personal information (such as passports and other key identifying documentation) so as to comply with money laundering and related regulation and in order to conduct satisfactory "Know Your Client" checks.

We obtain your personal data directly from you when you request a proposal from us in respect of the services we provide and when you engage us to provide our services and also during the provision of those services.

As required under Data Protection Laws, our legal basis for collecting and storing such personal information is that such processing is necessary for our legitimate interests in providing our services to you, principally being to support you in properly evaluating potential investments, and to assist your decision making in assembling successful management teams for your portfolio businesses.

We may process your personal data for purposes necessary for the performance of our contract with our private equity clients. We may also process your personal data for the purposes of our own legitimate interests provided that those interests do not override any of your own interests, rights and freedoms which require the protection of personal data. This includes processing for marketing, business development and management purposes.

We will only retain your personal data for as long as is necessary to fulfil the purposes for which it is collected. When assessing what retention period is appropriate for your personal data, we take into consideration the requirements of our business and the services provided, and statutory or legal obligations and the purposes for which we originally collected the personal data.

Where we need to use your personal data for a reason, other than the purpose for which we originally collected it, we will only use your personal data where that reason is compatible with the original purpose. If we need to use your data for a new purpose we will notify you and communicate our legal basis for this new processing.

Personal Information: Actual or Potential Management Teams of Private Equity Portfolio Businesses

If you are involved in a transaction that our private equity clients and/or the funds that they advise enter into, or a transaction that they evaluate, then if we act on their behalf we may keep certain limited amounts of your personal information. This might

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include information relating to your name, contact details, financial status and remuneration, your CV, details of your previous employment history and professional activities, your nationality, references provided by third parties, and results of other due diligence that either we or our private equity clients may have conducted. We collect and store this information for the purposes of:

1. Supporting and advising our private equity clients in evaluating potential transactions;
2. Assessing your experience and suitability for acting in the roles proposed should our private equity clients complete on the transactions under consideration

As required under Data Protection Laws, our legal basis for collecting and storing such personal information is that such processing is necessary for our legitimate interests in supporting the due diligence exercises of our private equity clients, in particular in providing our services to our private equity clients supporting them to properly review potential investments, and to assist their decision making in assembling successful management teams for their portfolio businesses.

Whilst Everymind does not routinely obtain consent as the legal basis upon which it stores and processes personal data, it will, if necessary, and to the extent required by Data Protection Laws, obtain the consent of the data subject to hold and process personal information. If consent is required, it can be withdrawn by the data subject at any time. In providing our services to private equity clients personal information may be received by Everymind from our private equity clients or directly from another third party, for example a financial due diligence provider. In such circumstances it will be held in accordance with this Notice and Data Protection Law. The length of time such personal information will be held by Everymind will depend on why it was collected initially and whether the transaction considered by our private equity clients was completed or not. The requirements of applicable laws or regulations will also affect this.

Personal Information: Corporate Clients

The information we hold about you may include your personal details (such as your name, telephone number and email address), our correspondence and communications with you and details of any services you have received from us. And where we are providing coaching services to senior management we may also store personal details such as CV, nationality, previous employment history and professional activities, references provided by third parties, and results of other due diligence and personal assessments that may have been conducted.

In addition, Everymind may be required to obtain and hold personal information (such as passports and other key identifying documentation) so as to comply with money laundering and related regulation and in order to conduct satisfactory "Know Your Client" checks.

We obtain your personal data directly from you when you request a proposal from us in respect of the services we provide and when you engage us to provide our services and also during the provision of those services. In providing those services

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to our corporate clients we may also obtain from you personal details of our clients employees (name, telephone number and email addresses) as well as financial status (which may include salary and other benefits).

As required under Data Protection Laws, our legal basis for collecting and storing such personal information is that such processing is necessary for our legitimate interests in providing our services to our corporate clients, principally being to provide financial accounting services to those clients and coaching support to its senior financial management.

We may process your personal data for purposes necessary for the performance of our contract with our corporate clients. We may also process your personal data for the purposes of our own legitimate interests provided that those interests do not override any of your own interests, rights and freedoms which require the protection of personal data. This includes processing for marketing, business development and management purposes.

We will only retain your personal data for as long as is necessary to fulfil the purposes for which it is collected. When assessing what retention period is appropriate for your personal data, we take into consideration the requirements of our business and the services provided, and statutory or legal obligations and the purposes for which we originally collected the personal data.

Where we need to use your personal data for a reason, other than the purpose for which we originally collected it, we will only use your personal data where that reason is compatible with the original purpose. If we need to use your data for a new purpose we will notify you and communicate our legal basis for this new processing.

Personal Information: corporate suppliers, contractors and other professional services providers

We will store limited amounts of personal information relating to corporate suppliers of Everymind, or of other individual contractors who are engaged in providing services to us or our private equity clients. This may include names, job titles, qualifications, employer organisations and employment history, contact and bank account details.

With regards suppliers of corporate services (eg, web hosting, insurance) this personal information will be stored exclusively to satisfy our obligations to administer the services we provide to our clients. With regards individual contractors this personal information will be stored for the purposes of managing and preserving records of services they have provided to us, making payment to them for those services and authorising further services.

In providing our services to our private equity clients we may receive from our clients certain personal information of other professional advisors who are also providing services to these mutual clients. This personal information may include name, job titles and contact details. This personal information will be stored for the purposes of managing and preserving records of services to our clients.

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In accordance with Data Protection Laws, our legal basis for storing personal information that you provide to us is that such storage is necessary for our legitimate interests in running our business and providing services to our clients. Whilst Everymind does not routinely obtain consent as the legal basis upon which it stores and processes personal data, it will, if necessary, and to the extent required by Data Protection Laws, obtain the consent of the data subject to hold and process personal information. If consent is provided, it can be withdrawn by the data subject at any time. The length of time such personal information will be held by Everymind will depend on why it was collected initially. The requirements of applicable laws or regulations will also affect this.

We will only retain your personal data for as long as is necessary to fulfil the purposes for which it is collected. When assessing what retention period is appropriate for your personal data, we take into consideration the requirements of our business and the services provided, and statutory or legal obligations and the purposes for which we originally collected the personal data.

Where we need to use your personal data for a reason, other than the purpose for which we originally collected it, we will only use your personal data where that reason is compatible with the original purpose. If we need to use your data for a new purpose we will notify you and communicate our legal basis for this new processing.

Data Sharing

We will share your personal data with third parties where we are required by law, where it is necessary to administer the relationship between us, or where we have another legitimate interest in doing so. This may include sharing your personal data with a regulator or to otherwise comply with the law.

“Third parties” includes third-party service providers. The following activities are carried out by third-party service providers: IT and cloud services, professional advisory services and banking services. We only permit our third-party service providers to process your personal data for specified purposes and in accordance with our instructions.

Transferring Personal Data Outside the United Kingdom (UK)

We will not transfer the personal data we collect about you outside the UK.

Data Security

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

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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.

Rights of Access, Correction, Erasure, and Restriction

Your duty to inform us of changes

It is important that the personal data we hold about you is accurate and current. Should your personal information change, please notify us of any changes of which we need to be made aware by contacting us, using the contact details below.

Your rights in connection with personal data

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

- Request access to your personal data. This enables you to receive details of the personal data we hold about you and to check that we are processing it lawfully.
- Request correction of the personal data that we hold about you.
- Request erasure of your personal data. This enables you to ask us to delete or remove personal data 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 data where you have exercised your right to object to processing (see below).
- Object to processing of your personal data 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 basis. 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 data. This enables you to ask us to suspend the processing of personal data about you, for example if you want us to establish its accuracy or the reason for processing it.
- Request the transfer of your personal data to you or another data controller if the processing is based on consent, carried out by automated means and this is technically feasible.

If you want to exercise any of the above rights, please email our data protection point of contact at David.packford@everymind.co.uk.

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

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.

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Right to Withdraw Consent

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal data for a specific purpose (for example, in relation to direct marketing that you have indicated you would like to receive from us), you have the right to withdraw your consent for that processing at any time. To withdraw your consent, please email our data protection point of contact at David.packford@everymind.co.uk.

Once we have received notification that you have withdrawn your consent, we will no longer process your personal information (personal data) for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

Changes to this Notice

Any changes we may make to our privacy notice will be posted to our website at everymind.co.uk.

This privacy notice was last updated on 21st April 2021.

Contact Us

If you have any questions regarding this notice or if you would like to speak to us about the manner in which we process your personal data, please email our data protection point of contact at David.packford@everymind.co.uk. Or telephone David Packford, our Data Protection Officer, on 07515 899113.

You also have the right to make a complaint to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues, at any time. The ICO's contact details are:

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

Telephone – 0303 123 1113 or 01625 545 745