

SECURED INCOME FUND PLC

PRIVACY POLICY

Secured Income Fund PLC (the "**Company**", "**we**", "**us**" or "**our**") is committed to protecting the privacy of individuals whose data it processes ("**you**" or "**your**").

Structure of this notice

This privacy policy is provided in a layered format so you can click through to the section which relates to the information that we collect about you below.

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1. IMPORTANT INFORMATION AND WHO WE ARE

The Company is committed to protecting the privacy and security of personal data which is entrusted to us.

This privacy policy aims to give you information on how the Company collects and processes your personal data as a controller of data supplied by shareholders and potential investors in connection with holdings and/or investing in the Company including through your use of this website and by sending us correspondence, subscription forms or other materials submitted to us during the course of your relationship with us.

In addition, it outlines your data protection rights under applicable data protection laws in the EU and Guernsey, including the General Data Protection Regulation (Regulation 2016/679) (the "GDPR") and the Data Protection (Bailiwick of Guernsey) Law, 2017 (the "New DPL").

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

The Company has appointed a data privacy manager who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the data privacy manager at investor.communications@kkvim.com.

2. CATEGORIES OF DATA SUBJECTS

(A) INVESTORS

The following section of this policy sets out how the Company, as controller of personal data supplied by, and collected in relation to, shareholders and potential investors in the Company, will process such personal data.

The kind of information we hold about you

We may hold personal data about investors in the Company which is provided to us by you directly as a result of your holding and/or investment in the Company. Information may be obtained by completing and submitting application forms, through our website, recorded and monitored telephone calls, collation of due diligence as a result of holding your investment and/or corresponding with us. It also may be collated or provided to us by third parties for credit and money laundering checks and compliance purposes, such as screening. We may also process personal data about individuals that are connected with you as an investor (for example directors, trustees, employees, representatives, beneficiaries, shareholders, investors, clients, beneficial owners or agents).

In connection with your holding and/or investment in the Company, we may collect, store, and use the following categories of personal information about you: contact details (including name, title, address, telephone number, personal email address), your date of birth, marital status and dependants, occupation, copies of passport, driving licences and utility bills, bank account details and details relating to your investment activity and personal identifiers such as your social security number, national insurance number, tax file number and IP address.

In limited cases, we also collect what is known as “special categories” of information. Our money laundering, sanctions, financial crime and fraud prevention checks sometimes result in us obtaining information about political opinion, actual or alleged criminal convictions and offences.

You are not obliged to provide us with your information where it is requested but we may be unable to provide certain products and services or proceed with our business relationship with you if you do not do so. Where this is the case, we will make you aware.

How we will use and basis on which we process your data

Your personal data may be processed by the Company or its sub-processors (or any of their affiliates, agents, employees, delegates or sub-contractors) for the following purposes:

- to provide you with information on the Company (including performance updates), which is being carried out to pursue the Company's legitimate interests;
- to allow us to administer and manage your holding in the Company (including fee calculations and the payment of dividends and other corporate actions) which are necessary for the Company to comply with applicable laws and/or in its legitimate interest;
- to update and maintain records for the Company, including maintaining statutory registers, which is necessary to comply with the Company's legal obligations;
- to carry out anti-money laundering checks and other actions in an attempt to detect, prevent, investigate and prosecute fraud and crime and verify your identity, which the Company considers necessary for compliance with the Company's legal obligations, for the performance of a task being carried out in the public interest and/ or to pursue the Company's legitimate interests (including for the

prevention of fraud, money laundering, sanctions, terrorist financing, bribery, corruption and tax evasion);

- to prepare tax related information in order to report to tax authorities in compliance with a legal obligation to which the Company is subject;
- to scan and monitor emails sent to us (including attachments) for viruses or malicious software, to process and encrypt personal data to protect and manage email traffic, and to store personal data on our systems to pursue our legitimate interests including for document retention purposes; and
- such other actions as are necessary to manage the activities and/or to comply with the legal obligations of the Company, including by processing instructions, monitoring and recording electronic communications (including telephone calls and emails) for quality control, analysis and training purposes and enforcing or defending the rights and/or interests of the Company, in order to comply with the Company's legal obligations and/or to pursue the Company's legitimate interests such as use in connection with the Company's internal management and reporting, to administer, operate, facilitate and manage your account(s) with us and your use of our services and products, to facilitate our internal business operations, including assessing and managing risk and fulfilling our legal and regulatory requirements and to pursue the legitimate interests of the Company in relation to the prevention of fraud, money laundering, terrorist financing, bribery, corruption, tax evasion and to prevent the provision of financial and other services to persons who may be subject to economic or trade sanctions.

To the extent that such personal data contains special category data such as, for example: data relating to racial or ethnic origin, political opinion, religious or philosophical belief, or trade union membership then the processing of such data shall solely be for the purpose of complying with any duty imposed on us and/or the Administrator by an enactment including, but not limited to, legislation and regulatory obligations relating to Anti-Money Laundering and Combatting the Financing of Terrorism and all other related legislation. In limited circumstances, we may ask for your explicit written consent to process special category personal data and we shall inform you of our intended purpose(s) of processing such data at the relevant time.

We may only use information relating to criminal convictions where the law allows us to do so. We may use information relating to criminal convictions where it is necessary in relation to legal claims, where it is necessary to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public.

Some of the above grounds of processing will overlap and there may be several grounds which justify how we use your personal data.

Where such processing is being carried out on the basis that it is necessary to pursue the Company's legitimate interests, such legitimate interests should not override your interests, fundamental rights and freedoms. Such processing may include the use of your personal data for the purposes of sending you marketing communications, in relation to which you can at any time unsubscribe by notifying the Company in writing or by email to investor.communications@kkvim.com.

The Company does not anticipate being required to obtain your consent for the processing of your personal data as listed above. If the Company wishes to use your personal data for other purposes which do require your consent, the Company will contact you to request this.

(B) VISITORS TO OUR WEBSITE

The following section of this policy sets out how the Company may process personal data (as a controller) about visitors to its website. We would also note that our website uses cookies to distinguish you from other users of our website. For detailed information on the cookies we use and the purposes for which we use them please refer to the Cookies section of this policy.

The kind of information we hold about you

We may collect, use, store and transfer different kinds of personal data about you which you provide to us through our website: name, date of birth, address, email address, telephone numbers, technical data (including 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, usage data (including information about how you use our website, products and services, and marketing and communications preferences (including your preferences in receiving marketing from us and your communication preferences).

We do not collect any sensitive personal data or special categories of personal data about you through our website (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

How we collect your data

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

- direct interactions with you, including by filling in forms. This includes personal data you provide when you subscribe to our publications and/or request marketing to be sent to you.
- 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. We may also receive technical data about you if you visit other websites employing our cookies; and
- technical data from the following parties:
 - (a) analytics providers based outside the EU;
 - (b) advertising networks based inside OR outside the EU; and
 - (c) search information providers based inside OR outside the EU

How we will use and basis on which we process your data

Your personal data may be processed by the Company or its sub-processors (or any of their affiliates, agents, employees, delegates, or sub-contractors) for the following purposes:

- to send you updates on the performance of the Company, newsletters, invitations to events and other marketing communications which we will do (a) on the basis of our legitimate interests (such as if you are an investor in the Company); or (b) with your consent;
- to use data analytics to improve our website, marketing, customer experiences on the basis of our legitimate interests;

- to comply with legal or regulatory requirements;
- to scan and monitor emails sent to us (including attachments) for viruses or malicious software, to process and encrypt personal data to protect and manage email traffic, and to store personal data on our systems to pursue our legitimate interests including for document retention purposes; and
- such other actions as are necessary to manage the activities of the Company, including by processing instructions, monitoring and recording electronic communications (including telephone calls and emails) for quality control, analysis and training purposes and enforcing or defending the rights and/or interests of the Company, in order to comply with its legal obligations and/or to pursue its legitimate interests.

We will use your personal data in the following circumstances: where it is necessary for our legitimate interests, or those of a third party (including in relation to the sending of marketing communications) and where those legitimate interests do not override your interests and fundamental rights and freedoms; or where we need to comply with a legal or regulatory obligation.

If we consider it necessary to obtain your consent in relation to the use of your personal data (such as for sending emails to individuals that have not invested in the Company), we will contact you to request this consent. In such circumstances, we will provide you with full details of the personal data that we would like and the reason we need it, so that you can carefully consider whether you wish to consent. If you decide to provide your consent, you have the right to withdraw your consent at any time, although that will not affect the lawfulness of processes based on consent before its withdrawal. To withdraw your consent or to opt out of receiving marketing communications, please contact us at investor.communications@kkvim.com or follow the unsubscribe instructions included in each electronic marketing communication. 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.

Links to websites

Where the website provides links to other websites, the Company is not responsible for the data protection/privacy/cookie usage policies of such other websites, and you should check these policies on such other websites if you have any concerns about them. If you use one of these links to leave our website, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting a linked website and such websites are not governed by this policy. You should always exercise caution and review the privacy policy applicable to the website in question.

Cookies

A cookie is a small file which asks permission to be placed on your computer. Once you agree, the file is added, and the cookie helps analyse web traffic or lets you know when you visit a particular website. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences.

We use traffic log cookies to identify which pages are being used. This helps us analyse data about web page traffic and improve our Website by tailoring it to the needs of users. We only use this information for statistical analysis purposes.

Overall, cookies help us provide a better website by enabling us to monitor which pages users find useful and which they don't. A cookie does not give us access to a user's computer or any information about them, other than the data they choose to share with us.

The browsers of most computers, smartphones and other web-enabled devices are usually set up to accept cookies. If your browser preferences allow it, you can configure your browser to accept all cookies, reject all cookies, or notify you when cookies are set. Each browser is different, so check the "Help" menu of your browser to learn about how to change your cookie preferences.

However, please remember that cookies are often used to enable and improve certain functions on our website. If you choose to switch certain cookies off, it may affect how our website works and you may not be able to access all or parts of our website.

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.

You can find more information about the individual cookies that we use and the purposes for which we use them below:

Cookie	Cookie Name	Purpose	Lifespan
Google Analytics	_ga	Takes a timestamp of the exact moment in time when you leave our website.	26 months
	_gat	Tracks the number of times you have been to our website.	At end of browser session

Further details on cookies (including how to turn them off) can be found at www.allaboutcookies.org.

(C) BUSINESS CONTACTS

The following section of this policy sets out how the Company may process personal data (as a controller) about its business contacts and (current, previous and/or potential) service providers (and employees of service providers) and data subjects that have provided a business card to, or have corresponded with, the Company and analysts, journalists and other interested parties who have requested further information on the Company and who have provided their contact and personal details.

The kind of information we hold about you

We may collect, use, store and transfer different kinds of personal data about you which you provide to us including: name, date of birth, address, email address, telephone numbers, place of work and job title.

We do not collect any sensitive personal data or special categories of personal data about you through our website (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your

health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

How we will use and basis on which we process your data

We will use your personal data in the following circumstances: where it is necessary for our legitimate interests, or those of a third party, (including in relation to the sending of marketing communications) and where those legitimate interests do not override your interests and fundamental rights and freedoms; or where we need to comply with a legal or regulatory obligation.

Your personal data may be processed by the Company or its sub-processors (or any of their affiliates, agents, delegates or sub-contractors) for the following purposes:

- to hold your personal data on our system and to contact you on the basis of the legitimate interests of the Company (including in connection with using the services that you provide);
- in respect of suppliers, to allow us to process payments and orders in respect of any goods and services provided;
- to send you updates on the performance of the Company, newsletters, invitations to events and other marketing communications which we will do (a) on the basis of our legitimate interests (for example if you are an investor in the Company) or (b) with your consent;
- to comply with legal or regulatory requirements;
- to scan and monitor emails sent to us (including attachments) for viruses or malicious software, to process and encrypt personal data to protect and manage email traffic, and to store personal data on our systems to pursue our legitimate interests including for document retention purposes; and
- such other actions as are necessary to manage the activities of the Company including by processing instructions, monitoring and recording electronic communications (including telephone calls and emails) for quality control, analysis and training purposes and enforcing or defending the rights or interests of the Company, in order to comply with its legal obligations and/or to pursue its legitimate interests.

Where such processing is being carried out on the basis that it is necessary to pursue the Company's legitimate interests, such legitimate interests should not override your interests, fundamental rights and freedoms. Such processing may include the use of your personal data for the purposes of sending you marketing communications, in relation to which you can at any time unsubscribe by following the instructions contained in each marketing communication.

Right to withdraw consent

If we consider it necessary to obtain your consent in relation to the use of your personal data (such as for sending emails to individuals that have not invested in the Company), we will contact you to request this consent. In such circumstances, we will provide you with full details of the personal data that we would like and the reason we need it, so that you can carefully consider whether you wish to consent. If you decide to provide your consent, you have the right to withdraw your consent at any time, although that will not affect the lawfulness of processes based on consent before its withdrawal. To withdraw your consent or to opt out of receiving marketing communication, please contact us at investor.communications@kkvim.com or follow the unsubscribe instructions included in each

electronic marketing communication. 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.

(D) INDIVIDUALS ASSOCIATED WITH THE COMPANY'S BORROWERS

The following section of this policy sets out how the Company may process personal data (as a controller) about individuals associated with companies to whom the funds have extended (or intend to extend) credit, including directors and beneficial owners.

The kind of information we hold about you

We may hold personal data which is provided to us by you directly. Information may be obtained by corresponding with us and/or recorded and monitored telephone calls. We may also collect data from third parties such as background check providers, which may include credit references or reports from the disclosure and barring service (namely reports on unspent criminal convictions), from third party publicly accessible sources including Companies House records, and from the company in respect of which you are a director and/or beneficial owner.

We may collect, store, and use the following categories of personal information about you: contact details (including name, title, address, telephone number, personal email address), your date of birth, marital status and dependants, occupation, copies of passport, driving licences and utility bills, and personal identifiers such as your social security number, national insurance number, tax file number and IP address.

In limited cases, we also collect what is known as "special categories" of information. Our anti-money laundering, sanctions, financial crime and fraud prevention checks sometimes result in us obtaining information about political opinion, actual or alleged criminal convictions and offences.

How we will use and basis on which we process your data

Your personal data may be processed by the Company or its sub-processors (or any of their affiliates, agents, employees, delegates or sub-contractors) for the following purposes:

- to carry out anti-money laundering checks and other actions in an attempt to detect, prevent, investigate and prosecute fraud and crime and verify your identity, which the Company considers necessary for compliance with the Company's legal obligations, for the performance of a task being carried out in the public interest and/or to pursue the Company's legitimate interests (including for the prevention of fraud, money laundering, sanctions, terrorist financing, bribery, corruption and tax evasion); and
- such other actions as are necessary to manage the activities and/or to comply with the legal obligations of the Company, including by processing instructions, monitoring and recording electronic communications (including telephone calls and emails) for quality control, analysis and training purposes and enforcing or defending the rights and/or interests of the Company, in order to comply with the Company's legal obligations and/or to pursue the Company's legitimate interests such as use in connection with the Company's internal management and reporting, to administer, operate, facilitate and manage your account(s) with us and your use of our services and products, to facilitate our internal business operations, including assessing and managing risk and fulfilling our legal and regulatory requirements and to pursue the legitimate interests of the Company in relation to the prevention of fraud, money laundering, terrorist financing, bribery, corruption, tax evasion and to

prevent the provision of financial and other services to persons who may be subject to economic or trade sanctions.

To the extent that such personal data contains special category data such as, for example: data relating to racial or ethnic origin, political opinion, religious or philosophical belief, or trade union membership then the processing of such data shall solely be for the purpose of complying with any duty imposed on us by an enactment including, but not limited to, legislation and regulatory obligations relating to anti-money laundering, sanctions, financial crime and fraud prevention and all other related legislation. In limited circumstances, we may ask for your explicit written consent to process special category personal data and we shall inform you of our intended purpose(s) of processing such data at the relevant time.

We may only use information relating to criminal convictions where the law allows us to do so. We may use information relating to criminal convictions where it is necessary in relation to legal claims, where it is necessary to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public.

Some of the above grounds of processing will overlap and there may be several grounds which justify how we use your personal data.

Where such processing is being carried out on the basis that it is necessary to pursue the Company's legitimate interests, such legitimate interests should not override your interests, fundamental rights and freedoms.

The Company does not anticipate being required to obtain your consent for the processing of your personal data as listed above. If the Company wishes to use your personal data for other purposes which do require your consent, the Company will contact you to request this.

3. DISCLOSURES OF YOUR PERSONAL DATA

We will not disclose personal information we hold about you to any third party except as set out below.

We may disclose your personal data to other members of our group, to the board of the Company, to the company secretary, to third parties who are providing services to us, including IT service providers, event management, PR and marketing service providers, processors of the Company (including printers, registrars, administrators, investment managers, proxy service company), depositaries, auditors, tax advisers, telephone service providers, document storage providers, backup and disaster recovery service providers.

We may also disclose personal data we hold to third parties:

- in the event that we sell or transfer any business or assets, in which case we may disclose personal data we hold about you to the prospective and actual buyer of such business or assets; and/or
- if we are permitted by law to disclose your personal data to that third party or are under a legal obligation to disclose your personal data to that third party,

and all such parties are required to maintain the confidentiality of such information to the extent they receive it.

4. DATA RETENTION

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting 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.

5. INTERNATIONAL TRANSFERS

The Company is a controller incorporated in Guernsey and as such will be bound to comply with the New DPL. As the Company will be processing personal data of shareholders and potential investors who are in the European Union, the Company will also be required to comply with the GDPR. The New DPL substantially mirrors the requirements of the GDPR in relation to the processing of personal data. Guernsey has been found by the European Commission to provide an adequate level of data protection and therefore no safeguards (such as the European Commission's standard contractual clauses) are required for transfers of personal data to Guernsey.

Some of the external service providers used by the Company are based outside Guernsey and/or the European Economic Area (EEA) so their processing of your personal data will involve a transfer of data outside the EEA.

Whenever your personal data is transferred to a third country by us, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- we will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission, or by law or another supervisory authority. For further details of the European Commission adequacy regime, see European Commission: Adequacy of the protection of personal data in non-EU countries; or
- where we use certain service providers, we may conduct a transfer impact assessment and (provided we are satisfied that the personal data will be adequately protected on the basis of that assessment) use specific contracts approved by the European Commission which give personal data the same protection it has in Europe. For further details, see European Commission: Model contracts for the transfer of personal data to third countries.

Please contact us if you want further information on the specific mechanism used when transferring your personal data out of the EEA.

6. DATA SECURITY

The Company has put in place measures to ensure the security of the personal data it collects and stores about you. It will use its reasonable endeavours to protect your personal data from unauthorised disclosure and/or access, including through the use of network and database security measures, but it cannot guarantee the security of any data it collects and stores.

We have put in place 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 other 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.

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

7. YOUR LEGAL RIGHTS

In 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);
- 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; and
- withdraw your consent. If we are processing your personal data on the basis of your consent, you have the right to withdraw such consent at any time. Withdrawing your consent will not affect the lawfulness of processes based on consent before its withdrawal. To withdraw your consent or to opt out of receiving marketing communication, please contact us at investor.communications@kkvim.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.

If you wish to exercise any of the rights set out above, please contact the data privacy manager at investor.communications@kkvim.com.

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 if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

You have the right to make a complaint at any time, (a) in the UK, to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk); (b) in Guernsey, to the Data Protection Authority (www.odpa.gg); or (c) to any supervisory authority in the EU member state of your usual residence or place of work or of the place of the alleged breach, if you consider that the processing of your personal data carried out by us or the administrator of any other service provider to us, has breached data protection laws. We would, however, appreciate the opportunity to deal with your concerns before you approach any of the supervisory authorities so please contact us in the first instance by emailing investor.communications@kkvim.com.

8. CHANGES TO THIS PRIVACY NOTICE

We may update this privacy notice from time to time, and will communicate such updates through our website. We may also notify you from time to time about the processing of your data.

9. FURTHER INFORMATION

If you have any queries about this policy or your personal data, or you wish to submit an access request or raise a complaint about the way your personal data has been handled, please do so in writing and address this to the Directors, Secured Income Fund plc, Level 13 Broadgate Tower, 20 Primrose Street, London, EC2A 2EW or by email to investor.communications@kkvim.com.

Secured Income Fund plc is a public limited company incorporated in England with registered number 09682883 and is an investment company within the meaning of section 833 of the Companies Act 2006.

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Data Protection and Privacy Policy

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