

## KKV INVESTMENT MANAGEMENT LTD

### PRIVACY POLICY

KKV Investment Management Ltd, ("KKV", "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

KKV is committed to protecting the privacy of individuals whose data it processes on its own behalf as a controller and/or KKV as a processor of the funds that it manages and/or advises ("Funds").

This privacy notice aims to give you information on how KKV collects and processes your personal data as a controller, including through your use of this website, by applying for employment and/or to work with KKV, by sending us correspondence, providing us with products and/or services, and in respect of the Funds that it manages and/or advises.

In addition, it outlines your data protection rights under the EU data protection regime introduced by the General Data Protection Regulation (Regulation 2016/679) (the "GDPR").

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

Please contact KKV Investment Management Ltd, 25 Upper Brook Street, London W1K 7QD if you have any queries in relation to the processing of your personal data under this notice.

We have appointed a 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 privacy manager at [investor.communications@kkvim.com](mailto:investor.communications@kkvim.com).

KKV may from time to time update this notice. Please refer to this page regularly to see any changes or updates to this notice.

## **2. CATEGORIES OF DATA SUBJECTS**

### **(A) INVESTORS/SHAREHOLDERS**

The following section of this notice sets out how KKV processes personal data of investors in its Funds as controller. KKV may also process personal data as processor on behalf of the Funds (acting as controllers). Please refer to the privacy notices of those Funds in respect of how such data is processed.

We may hold personal data about investors/shareholders in the Funds which is provided to us by you directly as a result of your holding and/or investment in the Funds (by completing application forms, through our website, telephone calls and/or corresponding with us) or which is provided to us by third parties including fund administrators. We may also process personal data about individuals that are connected with you as an investor/shareholder (for example directors, trustees, employees, representatives, beneficiaries, shareholders, investors, clients, beneficial owners or agents). If you provide KKV with personal data relating to another data subject, you agree to provide that data subject with a copy of KKV's privacy notice.

In connection with your holding and/or investment in the Funds, we may collect, store, and use the following categories of personal information: contact details (including name, title, address, telephone number, personal email address), your date of birth, marital status and dependents, copies of passport, driving licences and utility bills, bank account details and details relating to your investment activity.

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.

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

- a) to provide you with information on the Funds (including performance updates) and invitations to events or meetings, which is being carried out to pursue KKV and/or the Funds' legitimate interests;
- b) to allow us to administer and manage your holding in the Funds (including fee calculations and the payment of dividends) which are necessary for KKV and/or the Funds to comply with applicable laws and/or in their legitimate interest;
- c) to update and maintain records for the Funds, including maintaining statutory registers, which is necessary to comply with KKV and/or the Funds' legal obligations;
- d) to carry out anti-money laundering checks and other actions in an attempt to detect, prevent, investigate and prosecute fraud and crime, which KKV considers necessary for compliance with KKV and/or the Funds' legal obligations, for the performance of a task being carried out in the public interest and/ or to pursue KKV and/or the Funds' legitimate interests (including for the prevention of fraud, money laundering, sanctions, terrorist financing, bribery, corruption and tax evasion);
- e) to prepare tax related information in order to report to tax authorities in compliance with a legal obligation to which KKV and/or the Funds are subject; and

- f) 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 KKV and/or the Funds' legitimate interests including for document retention purposes; and
- g) such other actions as are necessary to manage the activities and/or to comply with the legal obligations of KKV and/or the Funds, 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 KKV and/or the Funds, in order to comply with KKV and/or the Funds' legal obligations and/or to pursue KKV's and/or the Funds' legitimate interests.

Where such processing is being carried out on the basis that it is necessary to pursue KKV and/or the Funds' 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 contacting us at [investor.communications@kkvim.com](mailto:investor.communications@kkvim.com) or following the instructions contained in each marketing communication.

KKV and/or the Funds do not anticipate being required to obtain your consent for the processing of your personal data as listed above. If KKV and/or the Funds wish to use your personal data for other purposes which do require your consent, KKV will contact you to request this.

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.

## **(B) JOB APPLICANTS**

The following section of this notice sets out how KKV may process personal data (as a controller) about applicants of jobs or placements and potential workers and contractors.

KKV Investment Management Ltd is the data controller of the personal data that you provide, or which is provided to or collected by KKV during and/or in connection with any application for a position at KKV.

In connection with your application for work with us, we will collect, store, and use the following categories of personal data: name, title, address, telephone number, personal email address, date of birth, gender, employment history, qualifications, copies of passport/driving licence, contact details, bank account details, national insurance number, family member details, appraisals, information provided during telephone calls, interviews and/or meetings with you, information contained in your CV and cover letter or email, information obtained from social media, including LinkedIn, references and other information generated in the course of employment, details of salary, bonuses and other emoluments paid and of taxes deducted from those, information obtained from monitoring activities such as email monitoring.

We may also collect, store and use the following "special categories" of sensitive personal data: Information about your race or ethnicity, religious beliefs, sexual orientation and political opinions, information about your health, including any medical condition, health and sickness records and/or information about criminal convictions and offences.

We may collect personal data about candidates from the following sources: you, the candidate directly; recruitment agencies; background check providers; credit reference agencies; disclosure and barring service in respect of criminal convictions; your named referees; and data from third parties from a publicly accessible source including Companies House records and social media (such as LinkedIn).

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

- to assess your skills and qualifications, to consider your suitability for the position and to decide whether to enter into a contract with you;
- to carry out background and reference checks including contacting previous employers or colleagues, where applicable;
- to communicate with you about the recruitment process;
- to keep records related to our hiring processes;
- 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 KKV, 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 interests of KKV, in order to comply with its legal obligations and/or to pursue its legitimate interests.

We process this personal data on the basis of our legitimate interests (in order to decide whether to appoint you to work for us) and/or in order to comply with applicable laws.

Once we receive your CV and covering letter or your application form, we may process that information to decide whether KKV has any suitable vacancies and if you meet the basic requirements to be shortlisted for that role. If you do, we will decide whether your application is strong enough to invite you for an interview. If we decide to call you for an interview, we will use the information you provide to us at the interview to decide whether to offer you the work. If we decide to offer you the work, we will then take up references and we may carry out a criminal record or other checks before confirming your appointment.

If you fail to provide information when requested, which is necessary for us to consider your application (such as evidence of qualifications or work history), we will not be able to process your application. For example, if we require a credit check or references for this role and you fail to provide us with relevant details, we will not be able to take your application further.

We will use your sensitive personal data in the following ways:

- we will use information about your disability status to consider whether we need to provide appropriate adjustments during the recruitment process, for example whether adjustments need to be made during the interview; and
- we will use information about your race or national or ethnic origin, religious, philosophical or moral beliefs, or your sexual life or sexual orientation, to ensure equal opportunity monitoring and reporting.

We envisage that we will process information about criminal convictions. We will collect information about your criminal convictions history if we would like to offer you the work or a position (conditional on checks and any other conditions, such as references, being satisfactory). We are entitled to carry out a criminal records check in order to satisfy ourselves that there is nothing in your criminal convictions history which makes you unsuitable for the role. In particular, we are legally required by the UK Financial Conduct Authority to carry out due and diligent enquiry into persons carrying out any FCA controlled functions.

We have in place an appropriate policy document and safeguards which we are required by law to maintain when processing such data.

You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making.

We do not share your personal data with any third parties for the purposes of processing your application.

If your application is successful, the information you provide during the application process will be retained by KKV as part of your employee file and held in accordance with KKV's employee privacy notice or applicable laws.

If your application is unsuccessful, the information you have provided will be retained by KKV for a minimum of six (6) months after we have communicated to you our decision to you. We retain your personal information for that period so that we can show, in the event of a legal claim, that we have not discriminated against candidates on prohibited grounds and that we have conducted the recruitment exercise in a fair and transparent way. After this period, we will securely destroy your personal information in accordance with applicable laws and regulations. If we wish to retain your personal information on file, on the basis that a further opportunity may arise in future and we may wish to consider you for that, we will write to you separately, seeking your explicit consent to retain your personal information for a fixed period on that basis.

### **(C) VISITORS TO OUR WEBSITE**

The following section of this notice sets out how KKV 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 our Cookies Policy, available at [www.kkvim.com/cookie-policy](http://www.kkvim.com/cookie-policy).

We may collect, use, store and transfer different kinds of personal data 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 communications 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 through our website.

We may 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 communications 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 inside or outside the EU;
  - (b) advertising networks based inside or outside the EU; and
  - (c) search information providers based inside or outside the EU.

We will use your personal data in the following circumstances: where it is necessary for our legitimate interests, or those of a third party such as the Funds and where those legitimate interests do not override your interests and fundamental rights; or where we need to comply with a legal or regulatory obligation.

Your personal data may be processed by KKV 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 Funds, newsletters, invitations to events and other communications which we will do (a) on the basis of our legitimate interests if you are an investor in the Funds; 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 KKV and/or the Funds, 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 KKV and/or the Funds, in order to comply with their legal obligations and/or to pursue their legitimate interests.

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 Funds) 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, please contact us at [investor.communications@kkvim.com](mailto: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.

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.

Where the website provides links to other websites, KKV 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 notice. You should always exercise caution and review the privacy notice applicable to the website in question.

#### **(D) BUSINESS CONTACTS**

The following section of this notice sets out how KKV may process personal data (as a controller) about its business contacts including (current, previous and/or potential) service providers and employees of service providers), suppliers, fund managers/business partners, residents, tenants/operators/agents/vendors/advisers, and data subjects that have provided a business card to, or have corresponded with KKV.

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

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 through our website.

We will use your personal data in the following circumstances: where it is necessary for our legitimate interests, or those of a third party 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 KKV or its sub-processors (or any of their affiliates, employees, 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 KKV and/or the Funds (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;
- in respect of operators, to allow us to contact the operators and monitor their performance;
- in respect of vendors, to allow us to contact the vendors to arrange, negotiate or complete deals;

- to send you updates on the performance of the Funds, newsletters, invitations to events and other communications which we will do (a) on the basis of our legitimate interests if you are an investor in the Funds; 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 KKV and/or the Funds, 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 KKV and/or the Funds, in order to comply with their legal obligations and/or to pursue their legitimate interests.

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 Funds), 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, please contact us at [investor.communications@kkvim.com](mailto: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.

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

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.

#### **(D) INDIVIDUALS ASSOCIATED WITH OUR CLIENTS' BORROWERS**

The following section of this policy sets out how we may process personal data (as a controller) about individuals associated with companies to whom our clients 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 KKV 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 KKV considers necessary for compliance with KKV's legal obligations, for the performance of a task being carried out in the public interest and/or to pursue KKV'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 KKV, 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 KKV, in order to comply with KKV's legal obligations and/or to pursue KKV's legitimate interests such as use in connection with KKV'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 KKV 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 KKV's legitimate interests, such legitimate interests should not override your interests, fundamental rights and freedoms.

KKV does not anticipate being required to obtain your consent for the processing of your personal data as listed above. If KKV wishes to use your personal data for other purposes which do require your consent, KKV 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 boards of the Funds, to third parties who are providing services to us and/or the Funds, including IT or other third party service providers, financial institutions, event management, PR and marketing service providers, background and/or credit reference services, processors of the Funds (including printers, brokers, analysts, registrars, administrators, PR and marketing companies), telephone service providers, document storage providers, backup and disaster recovery service providers, payroll agents and providers of insurance products.

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

- a) 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
- b) 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.

### **4. INTERNATIONAL TRANSFERS**

Some of the external service providers used by KKV are based outside 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 out of the EEA 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. For further details, see European Commission: Adequacy of the protection of personal data in non-EU countries.
- 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.

## **5. DATA SECURITY**

KKV 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 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.

## **6. 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.
- 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](mailto:investor.communications@kkvim.com) or following 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.

If you wish to exercise any of the rights set out above, please contact [investor.communications@kkvim.com](mailto: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 to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

## **7. FURTHER INFORMATION**

If you have any queries about this notice 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 Privacy Manager at KKV Investment Management Ltd, 25 Upper Brook Street, London W1K 7QD or by email to [investor.communications@kkvim.com](mailto:investor.communications@kkvim.com).

KKV Investment Management Ltd is a company registered in England (registered number 12475228) and its registered office address is 25 Upper Brook Street, London W1K 7QD.

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