

Privacy Notice

HEPTAGON FUND PLC

In this notice, the terms “**we**” and “**us**” refers to Heptagon Fund plc, and the term “**Fund**” refers to one of our sub-funds.

About this privacy notice

This privacy notice sets out the basis on which personal data about you will be used by us. Please take the time to read and understand this privacy notice.

This privacy notice applies to you if:

- (a) you are an investor in the Fund or an applicant for shares in a Fund; or
- (b) your personal data has been provided to us in connection with an investment in the Fund or an application for shares in the Fund by another person (such as where you are a director, partner, trustee, employee, agent or direct or indirect owner of an investor or an applicant); or
- (c) we otherwise use your personal data.

We are a data controller in respect of your personal data for the purposes of data protection law, such as the European Union’s General Data Protection Regulation. We are responsible for ensuring that we use your personal data in compliance with data protection law.

We have appointed an administrator, and may appoint other data processors, which will process your personal data on our behalf. They will generally process the data in accordance with our instructions.

Personal data that we might use

We might process the following personal data about you:

- (a) *Information provided to us by you or (if different) the investor or applicant:* This might include your name and address (including proofs of name and address), contact details, date of birth, gender, nationality, photograph, signature, copies of identity documents, occupational history, job title, income, assets, other financial information, bank details, investment history, tax residency and tax identification information. Such information might be provided in an application form or in other documents (as part of an application process or at other times), face-to-face, by telephone, by email or otherwise.
- (b) *Information that we collect or generate:* This might include information relating to your (or another person’s) investment in the Fund, emails (and related data), call recordings and website usage data.
- (c) *Information that we obtain from other sources:* This might include information obtained for the purpose of our know-your-client procedures (which include anti-money laundering procedures, counter-terrorist financing procedures, politically-exposed-person checks and sanctions checks, among other things), information from government or public bodies, public websites and other public sources and information received from the investor’s or applicant’s advisers or from intermediaries.

Uses of your personal data

Your personal data may be stored and processed by us for the following purposes:

- (a) Assessing and processing applications for shares in a Fund and other share dealings, including performing know-your-client procedures, issuing and redeeming shares, receiving payments from and making payments to the investor, calculating net asset value, and overseeing these processes.
- (b) General business administration, including communicating with investors, communicating with service providers and counterparties, accountancy and audit services, risk monitoring, the administration of IT systems and monitoring and improving products.
- (c) Compliance with legal and regulatory obligations and industry standards, including know-your-client procedures, the automatic exchange of tax information and legal judgments.

- (d) In respect of information shared Heptagon Capital Limited, Heptagon Capital LLP and their affiliates, their business activities relating to us or any Fund, such as investor relations, discussions with our service providers and counterparties, decision-making in relation to a Fund, and business strategy, development and marketing.

We can process your personal data in these ways for the following reasons:

- (a) If you are the applicant, you may enter into an investment contract with us and some processing will be necessary for the performance of that contract, or will be done at your request prior to entering into that contract.
- (b) Processing may be necessary to discharge a relevant legal or regulatory obligation.
- (c) Processing is in all cases necessary, for our or our affiliates' legitimate business interests, or those of the administrator or another person, such as:
 - (i) ensuring compliance with all legal and regulatory obligations and industry standards, and preventing fraud;
 - (ii) establishing, exercising or defending legal rights or for other purposes relating to legal proceedings;
 - (iii) ensuring the security of information systems; and
 - (iv) carrying out our ordinary or reasonable business activities, or those of Heptagon Capital Limited, Heptagon Capital LLP, the administrator or other persons, or other activities previously disclosed to investors or referred to in this privacy notice.
- (d) If we process any sensitive personal data (which is data which falls within certain special categories, such as any personal data relating to the political opinions of a politically exposed person), any processing we do will be necessary for reasons of substantial public interest.

Disclosure of your personal data to third parties

We may from time to time, in accordance with the purposes described above, disclose your personal data to other parties, including (a) Heptagon Capital Limited, Heptagon Capital LLP and their affiliates, (b) our administrator, depository and their affiliates, (c) professional advisers such as law firms and accountancy firms, (d) certain other service providers, including technology service providers, (e) counterparties and (f) courts and regulatory, tax and governmental authorities.

Some of these persons will process your personal data in accordance with our instructions and others will themselves be responsible for their use of your personal data. These persons may be permitted to further disclose the personal data to other parties.

Transfers of your personal data outside the European Economic Area

Your personal data may be transferred to and stored by persons outside the European Economic Area (the "EEA"), and in particular may be transferred to and stored by our affiliates or service providers, and/or those of the administrator outside the EEA.

Where personal data is transferred outside the EEA, we will ensure that the transfer is subject to appropriate safeguards or is otherwise permitted under applicable law. For example, the country to which the personal data is transferred may be approved by the European Commission, or the recipient may have agreed to model contractual clauses approved by the European Commission that oblige them to protect the personal data, or the recipient may be located in the United States and be a certified member of the EU-US Privacy Shield scheme.

You can obtain more details of the protection given to your personal data when it is transferred outside the EEA, including a copy of any standard data protection clauses entered into with recipients of your personal data, by contacting us using the details set out under "Contacting us" below.

Necessity of personal data for an investment in a Fund

The provision of certain personal data is necessary for shares in a Fund to be issued and for compliance by us and our service providers with certain legal and regulatory obligations. Accordingly, if certain personal

data is not provided when requested, an application for shares might not be accepted or other appropriate measures may be taken.

Retention of personal data

How long we hold your personal data for will vary. The retention period will be determined by various criteria, including the purposes for which we are using it (as it will need to be kept for as long as is necessary for any of those purposes) and legal obligations (as laws or regulations may set a minimum period for which we have to keep your personal data).

Your rights

You have a number of legal rights in relation to the personal data that we hold about you. These rights include the following:

- (a) The right to obtain information regarding the processing of your personal data and to access to the personal data that we hold about you.
- (b) In some circumstances, the right to receive some personal data in a structured, commonly used and machine-readable format and the right to request that we transmit that data to a third party where this is technically feasible. Please note that this right only applies to personal data which you have provided to us.
- (c) The right to request that we rectify your personal data if it is inaccurate or incomplete.
- (d) The right to request that we erase your personal data in certain circumstances. Please note that there may be circumstances where you ask us to erase your personal data but we are legally entitled to retain it.
- (e) The right to object to, and the right to request that we restrict, our processing of your personal data in certain circumstances. Again, there may be circumstances where you object to, or ask us to restrict, our processing of your personal data but we are legally entitled to continue processing your personal data or to refuse that request.
- (f) The right to lodge a complaint with an EU data regulator if you think that any of your rights have been infringed by us.

You can exercise your rights by contacting us using the details set out under “Contacting us” below. You can find out more information about your rights by contacting an EU data regulator such as the Irish Data Protection Commissioner, or by searching its website at www.dataprotection.ie.

Contacting us

If you would like further information on the collection, use, disclosure, transfer or processing of your personal data or the exercise of any of the rights listed above, please address questions and requests to:

Robert Rosenberg

Heptagon Capital

Email: robert.rosenberg@heptagon-capital.com

Phone: +44 020 7070 1808