

Management Due Diligence Privacy Notice

Part 1 – Overview

As you will appreciate, as part of any deal process, it is important that we get to know the management team, and this includes carrying out due diligence on individual members of the management team of a target business (we refer to this in this notice as the "**MTDD Process**").

The MTDD Process serves a range of purposes, including: (i) helping us to understand how the business works; (ii) understanding the strategy of the business and helping us plan for any future strategy; (iii) helping us to understand the personalities, strengths, weaknesses and dynamics of the management team, and understanding how well they work together and; (iv) getting to know the management team better as potential future colleagues if we choose to invest.

We find out about the management team both personally and professionally by obtaining information: (i) directly from you in the form of questionnaires and our discussions with you; (ii) from your colleagues, referees and other individuals that we may talk to about you; and (iii) from our review of information about the business. The information that we obtain from the MTDD Process is of course also combined with the other information that we obtain about your business as part of our wider due diligence.

In terms of our data protection related legal obligations, we rely on Livingbridge's legitimate interests in making appropriate investment decisions when carrying out the MTDD Process. In some instances (where we collect particularly sensitive data relating to your health or criminal background) we will ask you for your consent.

In Part 2 of this privacy notice (below), we have provided a lot more detail in the context of our compliance with our data protection related obligations. For example, we have provided more detail about the type personal data that we process about you as part of the MTDD Process, how we get it and why, together with information about security and your rights.

Please read Part 2 and if you have any questions about the processing of your personal data please contact Lindsay Hamilton (lindsay.hamilton@livingbridge.com). Every business is different, so every due diligence process is different too. The information set out in Part Two below sets out the steps that we typically or may take as part of the MTDD Process, not that we necessarily *will* take.

Part 2 – The MTDD privacy notice

1 Who are we?

At Livingbridge EP LLP and/or Livingbridge Enterprise LLP ("**we**", "**us**", "**our**") we recognise that it is important for you to understand how we use your personal information as part of our MTDD Process.

This privacy notice (and any other documents referred to in it) describes the way we will process and use any personal information about members of the management team within businesses that we may invest in. Prior to the completion of any investment deal, and prior to making an overall investment decision about whether to invest in your business or not, we carry out management due-diligence as part of our standard deal process which involves collecting information about some or all members of the management team within your business.

We aim to be transparent about our data practices regarding the personal data that we may collect, use, maintain and otherwise process. Please read this privacy notice carefully to understand our practices regarding your personal data and how we will treat it.

We have a legal duty to protect personal information that we collect under the Data Protection Act 2018 (the "**DPA**") and the General Data Protection Regulation (EU) 2016/679, (the "**GDPR**"); if you would to see further information on the types of personal data we collect and how we use it, please see sections 2 to 11 below. For the purpose of the DPA and GDPR, we (Livingbridge EP LLP) are the data controller (in other words, the organisation that determines how your personal information is used) and we are located at 100 Wood Street, London EC2V 7AN.

If you have any questions about this privacy policy, including any requests to exercise your rights, please contact Lindsay Hamilton (lindsay.hamilton@livingbridge.com).

2 *What personal data do we collect about you?*

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

The personal data that we may collect from or about you as part of the MTDD Process includes the following:

- Name
- Email address
- Postal address
- Date of birth
- Gender
- Any sanctions, judgments or proceedings brought against you (including criminal record data where you consent to giving it to us)
- Your health data (where you consent to giving it to us)
- Information relating to your personal finances and your economic interests (such as where you or a family member have an economic stake in an organisation)
- Current and historic job roles and employers including professional references
- Psychometric test data
- Other information about you collected from background checks, references and referees including character references
- Any other information that you, or anyone else, give to us about you

3 *How do we collect personal data about you?*

We may collect personal data about you in a variety of ways as part of the MTDD Process, which includes:

- when you give it to us in conversations with us or our trusted partners or on any forms or questionnaires that we (or our trusted partners) give to you;
- when someone else gives it to us or our trusted partners. This may be from one of your colleagues, your nominated referees, or anyone else that we choose to speak to about you as part of the MTDD Process;
- from any other background checks that we may carry out about you;
- from any relevant business information that we review (such as performance review information).

4 *How do we use your personal data and what are our justifications for doing so?*

How and why we use your personal data	What is our legal justification for processing your personal data
Your personal data feeds into our wider due diligence process which ultimately helps us to determine whether or not to invest in the business. The MTDD Process serves a range of purposes, including: (i) helping us to understand how the business works; (ii) understanding the strategy of the business and helping us plan for any future strategy; (iii) helping us to understand the personalities, strengths, weaknesses and	We rely on our legitimate interests as a business for most of the processing that we carry out as part of the MTDD Process, however in some instances, we rely on your consent to process your personal data. We will always make it clear to you when we are asking for your consent. Where we rely on our legitimate interests, we will always make sure that we balance these interests

dynamics of the management team, and understanding how well they work together and; (iv) getting to know the management team better as potential future colleagues if we choose to invest.	against your rights.
To fulfil our legal and compliance-related obligations	In some cases we will use your personal data because it's necessary for us to comply with a legal obligation (such as if we receive a legitimate request from a law enforcement agency).

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

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

5 *How do we share your information?*

In order to carry out the MTDD Process, we share your personal data with our trusted third-party service providers as detailed below. Whenever we share your personal data, we put safeguards in place which require these other organisations to keep your data safe. We will never sell your personal data to a third party for their own use.

To carry out the MTDD Process:

We work with a number of trusted service providers who carry out elements of the MTDD process on our behalf. If you would like further details, please contact us using the details below. It is in our legitimate interests as a business to work with these service providers since we may not have the capabilities to provide these services ourselves. In each case, we will ensure that the service provider is only allowed to use your personal data in order to provide the services to us and for no other purpose.

Sharing data to prevent crime and otherwise comply with laws:

There may be scenarios where we are subject to a legal obligation to disclose or share your personal data, such as with law enforcement agencies, regulatory bodies or public authorities in order to prevent or detect crime. We will only ever disclose your personal data to these third parties to the extent we are required to do so by law.

Where our group structure changes:

We may also share your personal data if we choose to sell, transfer, or merge parts of our business and/or group, or our assets in the future. Or we may seek to acquire other businesses or merge with them. During any such process, we may share your data with other parties. We will only do this if they agree to keep your data safe and private. If a change to our group happens, then other parties may use your data in the same way as set out in this notice.

6 *Where we transfer and store personal data*

We may transfer your personal data outside of the UK and the European Economic Area (EEA) where local laws may not provide legal protection for your information in the same way as is applicable in the UK or the EEA.

Whenever we send (or permit a third party to send) your personal data outside of the UK and the EEA, we will make sure that we take steps necessary to protect your data as required by applicable laws. For example, we may require the overseas recipient to enter into particular contract terms.

If you would like more information on how we protect your personal data when it is transferred outside of the UK and EEA, please contact Lindsay Hamilton (lindsay.hamilton@livingbridge.com).

7 *Security of your personal information*

We take the security of your data very seriously and, as you would expect, we have put physical, technical, operational and administrative strategies, controls and measures in place to help protect your personal information from unauthorised access, use or disclosure as required by law and in accordance with accepted good industry practice. We will always keep these under review to make sure that the measures we have implemented remain appropriate.

8 *Retention of personal information*

We will keep your personal information for limited and appropriate periods of time only in accordance with our retention policy and the applicable retention periods will always be linked to our purposes for processing your personal information. This means that the retention periods may vary according to the type of personal information.

9 *Your rights in your personal information*

You have certain rights in respect of the personal information that we hold about you.

You have the right to ask to see what personal data we hold about you and how we process the data (and in some circumstances, you can ask us to provide a copy to a third party). You can also ask us to correct or update any inaccurate personal data, to delete or stop using personal data where we have no good reason to use it, and to not be subject to decisions made solely by 'automated processing' in certain circumstances.

To exercise any of these rights, please contact Lindsay Hamilton (lindsay.hamilton@livingbridge.com).

10 *Changes to our policy*

We reserve the right to modify this privacy policy from time to time – for example, if we need to reflect changes to the way that we use your personal information. Any changes we make during the MTDD Process will be communicated to your internal deal lead, who will be instructed to notify you of any updates.

11 *Contact and complaints*

We are very keen to hear from you, including if you have any questions, concerns, comments, requests or complaints regarding this privacy policy, our websites and/or our use of your personal information. Please contact Lindsay Hamilton (lindsay.hamilton@livingbridge.com).

If you have any complaints regarding this privacy policy or the way that we use your personal information you may also contact the UK Information Commissioner at telephone number 0303 123 1113 or <https://ico.org.uk/>