

Baronsmead

Baronsmead Venture Trust plc / Baronsmead Second Venture Trust plc

Privacy Notice

This Privacy Notice applies to each of Baronsmead Venture Trust plc and Baronsmead Second Venture Trust plc.

References in this Privacy Notice to, "the company", "we", "us", or "our" are to Baronsmead Venture Trust plc and Baronsmead Second Venture Trust plc and their respective agents (in each case as the context permits).

The company is committed to protecting and respecting your privacy. This Privacy Notice describes how we collect, use and otherwise process personal data relating to you, or that you provide to us:

- (i) when you visit or use the website at (as relevant) www.baronsmeadvcts.co.uk (the "Website" or "Site");
- (ii) when you contact us (in writing, by telephone or in person), for example regarding your investment in the company or to submit a query or comment regarding the Website or its content; and/or
- (iii) in the other circumstances described in section 1 below.

Please read the following carefully to understand our practices regarding personal data and how we will treat it.

For the purposes of laws regarding data protection, the data controller of the personal data referred to above is (as relevant) Baronsmead Venture Trust plc, a public limited company registered in England and Wales with registered number 03504214, or Baronsmead Second Venture Trust plc, a public limited company registered in England and Wales with registered number 04115341, each of whose registered office address is at 5 New Street Square, London EC4A 3TW.

In this Privacy Notice, the terms "personal data", "processing", "data controller" and "data processor" shall have the meaning ascribed to them in the UK General Data Protection Regulation.

Contents:

1. Personal data we collect
 2. How we use personal data
 3. Marketing
 4. Disclosure of personal data
 5. External Links
 6. Social Media Platforms
 7. Where we store personal data
 8. Changes of Business Ownership and Control
 9. Security
 10. Your rights
 11. Changes to this notice
 12. Contact
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1. Personal data we collect

We collect and process the following personal data relating to you:

- your name, contact details and other information contained in communications you send to us or that you provide to us when you contact us (in writing, by telephone or in person), regarding your investment in the company or to submit a query or comment regarding the Website or its content;
- data collected by us in connection with your investment in the company, for example shareholder names, contact details, bank mandate instructions, offers for subscription, tax identification numbers, shareholder identification numbers, dividend payments and other such information as required to be maintained in accordance with applicable legal or regulatory requirements;
- data collected by Gresham House Asset Management Limited in its capacity as Company Secretary and Administrator (as data processor on our behalf), for example shareholder names, contact details, bank mandate instruction, offers for subscription, tax identification numbers, dividend payments and other such information as required to be maintained by the Company Secretary in accordance with applicable legal or regulatory requirements;
- data from surveys that we may, from time to time, conduct with our suppliers, such as Gresham House Asset Management Limited and the Company's Registrars, for research purposes, if you choose to respond to, or participate in, them.

We also collect personal data automatically when you use the Website and when you navigate through the Website. Data collected automatically may include usage details, geo-location data, IP addresses and other data collected through cookies and other tracking technologies. For more information on our use of these technologies, see our [Online privacy and cookies policy](#).

2. How we use personal data

We use personal data relating to you that we collect, or that you provide to us, for the purposes of our legitimate interests as follows:

- to respond to your queries;
- to provide you with information, products or services that you request from us or which we feel may interest you, where you have expressly consented to be contacted for such purposes (please see paragraph entitled "Marketing" for further information);
- to ensure that content from the Website is presented in the most effective manner for you and for your computer;
- to notify you about changes to the Website and the materials on the Website;
- as part of our efforts to keep the Website safe and secure; and
- for any other purposes that you would reasonably expect.

We use personal data relating to shareholders that we collect, or that you provide to us, for the purposes of fulfilling our statutory obligations, including: maintaining shareholder names, contact details and identification numbers; details of shareholdings; details of dividend payments; bank mandate instructions; dividend investment scheme elections (to the extent applicable) and other such information as you would reasonably expect.

3. Marketing

We will only send you marketing material electronically if you consent. You have the right at any time to opt out of receiving marketing material from us (either by using the unsubscribe facility in the marketing material or by request to baronsmeadvcts@greshamhouse.com).

Baronsmead

If you are a shareholder, we are required by legislation to send you copies of our Annual and Half-Year Reports (either electronically or by post), and other shareholder circulars and communications, such as notices of general meetings.

4. Disclosure of personal data

We may disclose personal data relating to you to third parties in certain circumstances including (but not limited to) the following:

- our third party service providers, such as those we engage to host and maintain the Website, our IT systems and to assist us with marketing campaigns;
- analytics and search engine service providers that assist us in the improvement and optimisation of this Website;
- to the extent that it is connected with fundraisings or other corporate actions, with our advisers, agents and representatives;
- law enforcement bodies, Courts of law or as otherwise required or authorised by law; and
- regulatory, trade association or government bodies for the purposes of resolving complaints or disputes both internally and externally or to comply with any investigation by one of those bodies.

We may also disclose personal data to third parties if we are under a duty to disclose or share personal data relating to you in order to comply with any legal obligation, or in order to enforce or apply our website [Terms and conditions](#) and other agreements; or to protect the rights, property, or safety of us, our clients, or others.

Before we disclose personal data to a third party, we take steps to ensure that the third party will protect personal data in accordance with applicable privacy laws and in a manner consistent with this notice. Third parties are required to restrict their use of this personal data to the purpose for which the data was provided.

5. External Links

Although the Website only looks to include safe and relevant external links, users should always adopt a policy of caution before clicking any external web links mentioned throughout the Website.

The Website, which is maintained by Gresham House Asset Management Limited in its capacity as Investment Adviser, may from time to time, contain links to and from the websites of our partner networks. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

6. Social Media Platforms

Communication, engagement and actions taken through external social media platforms are subject to the terms and conditions as well as the privacy policies of those social media platforms.

This Website may use social sharing buttons which help share web content directly from our web pages to the social media platform in question. Where you use such social sharing buttons you do so at your own discretion. You should note that the social media platform may track and save your request to share a web page respectively through your social media platform account. Please note these social media platforms have their own privacy policies, and we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these social media platforms.

7. Where we store personal data

We may transfer your personal information to countries outside of the UK, including Guernsey and South Africa.

In relation to the transfer of personal information to Guernsey, the UK Government has issued an adequacy

decision in respect of Guernsey. This means that Guernsey is deemed by the UK to provide an adequate level of protection for your personal information, which means we can transfer personal information to Guernsey without having to put in place additional measures to ensure an adequate level of protection of personal information.

Whilst some countries already have adequate protections for personal information under applicable laws, in other countries (such as South Africa) steps will be necessary to ensure appropriate safeguards apply to maintain the same levels of protection as are needed under data protection laws applicable to us in the UK.

We will only make such transfers if:

- the country to which the personal data is to be transferred ensures an adequate level of protection for personal data;
- we have put in place appropriate safeguards to protect your personal data, such as an appropriate contract with the recipient;
- the transfer is necessary for one of the reasons specified in data protection legislation, such as the performance of a contract between us and you;
- Binding Corporate Rules apply; or
- you explicitly consent to the transfer.

By submitting your personal data, you accept that personal data relating to you may be transferred, stored or processed in this way. We will take all steps reasonably necessary to ensure that the recipients of your data will treat that data securely and in accordance with this notice. For more information about what are the appropriate safeguards and how to obtain a copy of them or to find out where they have been made available, email GDPRenquiries@greshamhouse.com

8. Changes of Business Ownership and Control

We may, from time to time, expand, reduce or sell our business, and this may involve the transfer of certain divisions or the whole business to other parties. Personal data relating to you will, where it is relevant to any division so transferred, be transferred along with that division and the new owner or newly controlling party will, under the terms of this Privacy Notice, be permitted to use personal data relating to you for the purposes for which it was supplied by you.

9. Security

Unfortunately, the transmission of information and data via the internet is not completely secure. Although we will do our best to protect personal data relating to you, we cannot guarantee the security of such data transmitted to the Website; any transmission is at your own risk. Once we have received personal data relating to you, we use strict procedures and security features to try to prevent unauthorised access.

The security of personal data regarding you is a high priority. We take such steps as are reasonable to securely store personal data regarding you so that it is protected from unauthorised use or access, misuse, loss, modification or unauthorised disclosure. This includes both physical and electronic security measures. Examples include the use of passwords, locked storage cabinets and secured storage rooms. Other features include:

- storing information on secured networks consistent with industry standards, which are only accessible by those employees who have special access rights to such systems;
 - using industry-standard encryption technologies when transferring or receiving personal data, such as SSL technology;
 - restrictions are placed on the electronic transfer of files; and
 - our IT networks undergo necessary vulnerability testing to continually identify and remediate potential opportunities for unauthorised data access.
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We take steps to destroy or de-identify personal data when the information is no longer required for any purpose for which it may be used or disclosed by us and we are no longer required by law to retain the information.

10. Your rights

Data protection laws give you the right to access personal data held relating to you. To protect your privacy, we may take steps to verify your identity before taking any action in response to any request.

We also want to make sure that any personal data relating to you that we hold is accurate and up to date. You may ask us to correct or remove any personal data you think is inaccurate.

You also have the right, in certain circumstances, to:

- the erasure of personal data relating to you that we hold;
- the restriction of processing of personal data relating to you that we hold; and
- object to our processing of personal data relating to you that we hold.

Your ability to exercise these rights will depend on a number of factors and in some instances, we will not be able to comply with your request (for example because we have legitimate grounds for not doing so or where the right does not apply to the particular data we hold on you).

You should note that if you exercise certain of these rights we may be unable to continue to provide some or all of our services to you (for example where the personal data is required by us to comply with a statutory requirement, or is necessary in order for us to perform our obligations to you).

If you would like to exercise any of these rights or if you have any questions about our processing of personal data relating to you, please contact us at baronsmeadvcts@greshamhouse.com.

We will respect and provide you with all rights in relation to personal data relating to you that we hold, and to which you are entitled, under applicable law.

If you have a concern about the way we are collecting or using personal data relating to you, we request that you raise your concern with us in the first instance at baronsmeadvcts@greshamhouse.com. Alternatively, you can contact the Information Commissioner's Office at <https://ico.org.uk/concerns/>.

11. Changes to this notice

We review and amend our Privacy Notice from time to time. Any changes we make to this notice in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to this notice. The new terms may be displayed on-screen and you may be required to read and accept them to continue your use of the Website.

12. Contact

You can contact us by emailing us at baronsmeadvcts@greshamhouse.com or writing to us or telephoning us at:

The Company Secretary

Baronsmead Venture Trust plc / Baronsmead Second Venture Trust plc

5 New Street Square
London
EC4A 3RW
Tel: 020 7382 0999

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