

Group GDPR Privacy Notice

Date: April 2021

Version: 03

MELFORD.

Data protection privacy notice

We are committed to protecting your personal information and ensuring we respect your privacy. This Privacy Notice explains how we will look after and use any personal information that we collect about you.

Who we are

Melford Capital Partners (Holdings) LLP, Melford III Partnership LLP, Melford Capital Partners (Guernsey) Ltd, Melford III GP Ltd, Melford Capital General Partner Limited, Melford II (GP) LLP, Melford Capital Advisers Ltd and Melford Capital Partners LLP, (together; “Melford”) may act as controllers of the personal information you provide to us. If you have any questions about this Privacy Notice or the information that we hold about you please contact us at info@melfordcapital.com.

If you have any concerns about the way in which we treat your data, we would appreciate the chance to deal with those concerns, so please contact us using the email address above.

What types of information do we use?

We collect information in the course of providing our services to you. The information which we collect, use, store and transfer about you are:

- Name
- Work address
- Work email
- Gender
- Qualifications

We do not collect any special categories of personal data. 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 or biometric data.

Consequences of not providing some types of information

Where we need to collect your personal information by law, or under the terms of a contract we have with you, and you fail to provide that information when requested, we may not be able to provide the goods or services you asked for. In this case we may have to cancel the product or services but we will tell you if this is the case.

How we will use your personal information

We only obtain, use and keep personal information where we need it for a specific purpose. We set out in the table below the ways in which we plan to use your personal information. We are only able to use your personal information if we have a proper legal reason or basis for doing so. This is called a legal basis and the regulations require that we have a legal basis so that your privacy is protected. Most commonly we will use your information in the following ways:

- We have a **contract** with you. For example, we manage a fund for which you are an investor in accordance with the constitutional documents of the fund.
- We have a **legal obligation**. We need to use your personal information to comply with laws that assist in the prevention of financial crime and to comply with regulatory obligations. For example this might include confirming your identity and source of wealth, as well as ensuring we provide you with necessary information so you understand the risk of the financial services we can provide.

- We, or a third party, have a **legitimate interest** in processing the information and your interests and fundamental right do not override those interests. For example, processing your information to source deals.

We set out in the table below all the ways we plan to use your personal information and the legal bases we rely on to do so. We also explain what our legitimate interests are where appropriate:

Purpose	Lawful basis for processing including our legitimate interests
To facilitate investment into our funds and coinvestment opportunities and comply with our obligations as manager as set out in the constitutional documents of the funds.	To fulfil our contact with investors
To facilitate investment into real estate opportunities, manage the investment and to exit these investments	To fulfil our investment agreements and purchase/sale agreements
To purchase services from our suppliers	To fulfil our contracts with suppliers
To comply with our KYC and customer due diligence obligations.	To fulfil our regulatory obligations
We process the personal data of a wide variety of business contacts for the purposes of conducting key parts of real estate business, such as fundraising, generating deal flow, and managing the underlying investments.	Necessary for our legitimate interests – to conduct the business of a real estate fund manager

We will only use your personal information for the reason for which we collected it. We will only use it for another reason if we believe that new reason is compatible with the original purpose. If we do need to use your personal information for a non-related purpose we will tell you about it and explain the legal basis which allows us to do so.

Who we share your information with

We may need to provide information to third parties for a variety of reasons, for example, we may need to provide information to assist in the detection or prevention of crime or for the purpose of safeguarding national security. Please refer to the table in the section ‘How we will use your personal information’ which explains how we use your data. The third parties we share your information with are as follows:

- The funds you are invested in
- Our service providers such as accountants, fund administrators, and lawyers
- Counterparties to a transaction

Sending your information outside the EEA and the UK

The regulations which have been put in place to protect your privacy apply throughout the EEA and UK. As explained in the section above we may send your information to other third parties who are based outside of the

EEA and UK, however we will only share your information with them because the country we send your information to is deemed to provide an adequate level of protection by the European Commission, or where we have your explicit permission to do so.

Storing your information

As a financial services provider we will typically have a contract with you and will need to keep your personal information (updated to ensure accuracy) to fulfil our contract. We also need to comply with UK law, which often requires us to keep certain records - which will include certain personal information – for several years.

Our policy is to keep records on prospective investors and other business contacts indefinitely as we may wish contact long standing contacts about a particularly relevant opportunity in the future, and in the context of real estate business there is no way to predict when such an opportunity might arise. We will ensure all records are safely destroyed if we no longer need to retain them. We review our retention periods for personal information on a regular basis. We will tell you if we change the retention period.

Your rights

You are provided with a number of different rights under the data protection laws in relation to your personal information. These allow you:

- To access your information;
- To request we correct your information;
- To request that we erase your information;
- To object to the processing of your information;
- To request a restriction in the processing of your information;
- To request a transfer of your information;
- Complain to the Information Commissioner's Office; and
- To withdraw your consent.

If you wish to exercise any of these rights please contact info@melfordcapital.com. We may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive or we may refuse to deal with your request.