

Privacy Policy

Version 1.2, June 2023

1. Introduction

Spire Management Limited ("Spire", "we", "us", or "our") respects your privacy and is committed to protecting your personal data. We will ensure that your personal data is handled in accordance with applicable data protection laws. The laws that may apply to our handling of your personal data are: (i) the United Kingdom General Data Protection Regulation; (ii) the Data Protection Act 2018; (iii) the EU General Data Protection Regulation 2016; (iv) the Privacy and Electronic Communications (EC Directive) Regulations 2003; and (v) all similar or related legislation relating to the processing of personal data and/or privacy applicable to Spire from time to time or as re-enacted, applied, amended, superseded, repealed or consolidated (together the "Data Protection Legislation").

This privacy policy ("Privacy Policy") will inform you as to how we look after your personal data, and tell you about your privacy rights and how the Data Protection Legislation protects you.

2. Important information and who we are

Purpose of this Privacy Policy

This Privacy Policy aims to give you information on how Spire collects and processes your personal data, including through your use of this website. This website is not intended for children, and we do not knowingly collect data relating to children.

It is important that you read this Privacy Policy together with our [Cookie Policy](#), and any other privacy or personal data-related policies or notices that we may

provide on specific occasions when we are collecting or processing your personal data (such as our Candidate Privacy Notice, when you apply to work with us), so that you are fully aware of how and why we are using your personal data. This Privacy Policy supplements other policies and notices, and it is not intended to override them.

Controller

Spire will, ordinarily, hold your information as data controller.

Contact details

If you have any questions about this Privacy Policy or our privacy practices, please contact us in the following ways:

Full name of legal entity

Spire Management Limited

Email address

info@spirellp.com

Postal and registered address

1st Floor, 24 Grosvenor Street, London W1K 4QN

Complaints

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) or the Data Protection Commission (DPC), the Irish supervisory authority for data protection issues (<https://www.dataprotection.ie/>), as applicable. We would appreciate the chance to deal with your concerns before you approach the supervisory authority, so please do feel free to contact us in the first instance and we will try our best to address your concerns.

Changes to the Privacy Policy and your duty to inform us of changes

We keep our Privacy Policy under regular review and may amend it at any time. Any changes to this Privacy Policy will be posted on our website at www.spirellp.com.

It is important that the personal data we hold about you is accurate, complete and current. Please ensure that any personal data you provide us with is accurate

and complete and keep us informed if your personal data changes at any time during your relationship with us, so that we can update our records.

Third-party links

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their processing of personal data. When you leave our website, we encourage you to read the privacy policy of every website you visit.

3. The data we collect about you

Personal data, or personal information, means any information about a living individual from which that person can be identified. It does not include data which has been anonymised so that an individual is not or no longer identifiable. We may collect, use, store and transfer different kinds of personal data about you, which we have grouped together as follows:

- Identity Data includes name, job title and function, employer, title and gender;
- Contact Data includes address, email address and telephone numbers;
- Biography Data includes information from your professional and educational history including information about your previous employment, education and awards;
- Transaction Data includes details about payments to and from you, other details of products and services you have purchased from us or we have purchased from you, and details about any fund subscriptions and redemptions with us; and
- Technical Data includes information about how you use our website (please see our [Cookie Policy](#) for further information in this regard).

We also collect, use and share aggregated data such as statistical or demographic data. Aggregated data could be derived from your personal data, but is anonymised and as such is not considered personal data. For example, we may aggregate Technical Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect aggregated data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this

Privacy Policy. We do not intentionally collect any special category personal data about you (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).

If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have or are trying to enter with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us, but we will notify you if this is the case at the time.

4. How is your personal data collected?

Direct interactions

You may give us your Identity, Contact, Biography, and Transaction Data by filling in forms or by corresponding with us by post, phone, email or otherwise.

Third parties or publicly available sources

We may receive personal data about you from various third parties and public sources as set out below:

- Technical Data from the following parties:
 - analytics providers;
 - advertising networks; and
 - search information providers.
- Contact and Transaction Data from providers of technical, payment and delivery services.
- Identity, Contact and Biography Data from data brokers or aggregators.
- Identity, Contact and Biography Data from publicly available sources.

5. How we use your personal data

We will only use your personal data in accordance with applicable Data Protection Legislation.

We may use your personal data to:

- provide our products and services or receive products and services from you;
- run our business affairs, including internal record keeping;
- comply with our legal obligations, including reporting obligations;
- administer and protect this website;
- send business or marketing communications which we think may be of interest (we will provide a simple mechanism for your to unsubscribe from such communications if you so wish).

The legal basis for processing your personal data is because it is necessary: (i) for our legitimate interests as a business; (ii) for the performance of a contract or to take steps prior to entering into a contract; and/or (iii) to comply with our legal obligations. In some instances we may rely on your express consent to use your personal data, but we will let you know (and give you the chance to withdraw consent) if we do.

Please contact us using the details provided above in section 2 ("Important information and who we are") if you need details about the specific legal ground we are relying on to process your personal data.

Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. You can ask us to stop sending you marketing messages at any time by contacting us. Where you opt out of receiving these marketing messages, we may continue using other personal data that we have collected about you in accordance with this Privacy Policy.

We will get your express opt-in consent before we share your personal data with any third party for marketing purposes.

Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For information about our use of cookies, please see our [Cookie Policy](#).

Change of purpose

We will only use your personal data for the purpose 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 using the details provided above in section 2 ("Important information and who we are").

If we need to use your personal data for a purpose which is not compatible with the original purpose for which we collected the personal data, we will ask for your consent to use your personal data for the new purpose.

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

6. Disclosures of your personal data

Where it is necessary for the purposes set out above in section 5 ("How we use your personal data"), we may share your personal data with certain third parties including:

- other companies in the Spire Group;
- service providers who provide IT and system administration services; and
- professional advisers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services.

You acknowledge that such third parties may receive and process your personal data. We require all third parties to respect the security of your personal data and to treat it in accordance with applicable Data Protection Legislation. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

In addition, it may be necessary to disclose your personal data if we are under a duty to do so in order to comply with any legal obligation (such as tax disclosure obligations), carry out an internal investigation, enforce any agreement we have with you or with a related party, or protect the rights, property, or safety of Spire and its group companies and/or our clients, directors employees and other personnel.

In exceptional circumstances, we may seek to sell, transfer or merge parts of our business or assets. Alternatively, we may seek to acquire other businesses or merge with them. We may disclose your information to a potential buyer, including your personal data and other information concerning your relationship

with us, so that they can continue to operate the business. If a change happens to the ownership of our business, then the new owners may use your personal data in the same way as set out in this Privacy Policy.

7. International transfers

In processing your personal data, it will sometimes be necessary for us to transfer your personal data outside the UK or European Economic Area ("EEA") (as applicable) to third parties such as overseas advisors or service providers.

We will take all steps reasonably necessary to ensure that your personal data is treated securely and in accordance with this Privacy Policy and applicable Data Protection Legislation. This means that we will only transfer your personal data to a party outside of the UK or EEA:

- to a country or territory which has been confirmed, in accordance with applicable Data Protection Legislation, to provide adequate protection to personal data;
- where other appropriate safeguards under applicable Data Protection Legislation are in place (such as where we and the receiving party have entered into a contract incorporating standard data protection clauses recognised or issued in accordance with applicable Data Protection Legislation) and we are satisfied that the relevant protections in applicable Data Protection Legislation are not undermined; or
- where we have your explicit consent to do so.

8. Data security

We have put in place appropriate technical and organisational measures to protect your personal data from being accidentally lost, or used, accessed altered or disclosed in an unauthorised way. This includes limiting access to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

Unfortunately, the transmission of information via the internet is not completely secure and, although we will take steps to protect your personal data, we cannot

guarantee the security of your personal data transmitted via our website; any transmission is therefore at your own risk.

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 in accordance with applicable Data Protection Legislation.

9. Data retention

How long will you use my personal data for?

We will only retain your personal data for as long as we reasonably require and, in any event, only for as long as we have a legal basis, right or obligation to retain it, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. By law we have to keep basic information about our customers (including certain Contact, Identity and Transaction Data) for six years after they cease being customers for tax purposes. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you. In some circumstances you can ask us to delete your data (see section 10 ("Your legal rights") below for further information).

In some circumstances we will anonymise your personal data so that, as set out above, it no longer includes data from which you are identified or identifiable). Anonymous data will no longer be considered personal data, and we may use this information indefinitely without further notice to you.

10. Your legal rights

You have the following rights under Data Protection Legislation:

- Right of access: You are entitled to ask us for copies of your personal data.
- Right to rectification: You are entitled to ask us to make any changes to ensure that any personal data we hold about you is accurate, complete and up to date.
- Right to erasure: You are entitled to ask us to erase or stop processing any personal data we hold about you in certain circumstances.
- Right to restriction of processing: You are entitled to ask us to restrict the processing of your personal data in certain circumstances.

- Right to object to processing: You are entitled to object to the processing of your personal data in certain circumstances.
- Right to data portability: You are entitled to ask that we transfer the personal data we hold about you to a specified third party, or to you, in certain circumstances.

If you wish to exercise any of the rights set out above, please contact us using the details provided above in section 2 ("Important information and who we are"). 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 requests within one month. Occasionally it could 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.