

RTP GLOBAL UK PRIVACY POLICY

1. INTRODUCTION

RTP Global UK Limited (**we, us or RTP Global UK**) are committed to protecting the privacy of all those whose personal data we process. Please read the following privacy policy that explains how we use and protect your information.

You may be reading this privacy policy for a range of reasons, for instance, you may be a (i) visitor to rtp.vc (**our website**); (ii) director, shareholder or ultimate beneficial owner of RTP Global UK or a company in which we invest (**investment company**); (iii) founder of an investment company; (iv) RTP Global UK employee (or applicant); or (v) visitor to our office premises.

Sections 1 to 12 of this policy apply to you whichever category you fall into. However, to help you locate the information that is most relevant to you, specific information in relation to our use of your personal information can be found by clicking the below links:

- [visitor to our website](#)
- [director, shareholder or ultimate beneficial owner of RTP Global UK or an investment company](#)
- [founder of an investment company](#)
- [RTP Global UK employee \(or applicant\)](#); or
- [visitor to our office premises](#)

2. RTP GLOBAL UK AS DATA CONTROLLER

RTP Global UK is the data controller of all personal information that we process about you. RTP Global UK is an entity within the wider RTP Global corporate group, which has offices internationally, including in New York (USA) and Bangalore (India) and with whom your data may be shared. For more information, please refer to “International Transfers” in section 6 below.

3. CONTACT DETAILS

If you have any queries or requests concerning this privacy policy or how we handle your personal data more generally, please get in touch with us by contacting our data protection team at dataprotection@rtp.vc.

If you would prefer to write to us, you can do so at: FAO Data Protection Team, RTP Global UK Limited, 25 Golden Square, London, W1F 9LU.

4. THE BASIS ON WHICH WE PROCESS YOUR INFORMATION

We will only process the data we collect about you if there is a reason for doing so, and if that reason is permitted under data protection law. We will have a lawful basis for processing your information if: (i) it is necessary to perform or enter into our contract with you; (ii) we have a legitimate interest for processing your data; (iii) you have provided your consent; or (iv) we are under a legal obligation to do so.

Where we use your information for our legitimate interests, we make sure that we take into account any potential impact that such use may have on you. Our legitimate interests don't automatically override yours and we won't use your information if we believe your interests should override ours, unless we have other grounds to do so (such as your consent or where we are under a legal obligation). If you have any concerns about our processing please refer to details of “Your Rights” in section 10 below.

5. HOW WE SHARE INFORMATION

The personal information we are holding about you may on the legal grounds set out in this privacy policy be shared with and processed by:

- our service providers, such as our marketing automation and analytics providers, technology (including cloud) service providers, payment providers, banks and other support providers;

- our professional advisors (such as our lawyers, accountants and auditors);
- another organisation to whom we may transfer any agreement we have with you, or if we enter into a joint venture with, purchase or are sold to or merged with another business entity or
- Ru-Net Enterprises Limited and any other affiliates or companies within the RTP Global corporate group.

6. INTERNATIONAL TRANSFERS

As part of our business, we may transfer your personal information. Accordingly, your personal data may be transferred to entities located in the USA, India, Mauritius, Singapore, Guernsey and the EU. However, we will only do so where:

- the required country guarantees the treatment of personal data to the same standard as the UK (e.g. in the case of EU countries);
- appropriate safeguards have been put in place which meet the requirements of the Article 46 of the UK GDPR, for example, using the UK International Data Transfer Agreement (IDTA) for transfers of personal data outside the UK together with any supplementary export measures; or
- one of the exceptions for specific situations under Article 49 of the UK GDPR together with any supplementary export measures applicable to the transfer. These include (in summary):
 - o the transfer is necessary to perform, or to form, a contract to which we are a party with you or with a third party where the contract is in your interests;
 - o you have provided your explicit consent to the transfer; or
 - o the transfer is of a limited nature, and is necessary for the purpose of our compelling legitimate interests.

7. DIRECT MARKETING

Where we have a legitimate interest for doing so (and are permitted to do so by law) we will use your information to let you know about our other activities and opportunities such as events and webinars that may be of interest to you and we may contact you to do so by email or phone. You can withdraw your consent or opt out of receiving our marketing communications at any time.

8. SECURITY

We adopt robust technologies and policies to ensure the personal information we hold about you is suitably protected.

We take appropriate technical and organisational measures to protect your information from unauthorised access and against unlawful processing, accidental loss, destruction and damage.

9. RETENTION OF YOUR INFORMATION

We will not retain your information for any longer than we think is necessary.

Information that we collect will be retained for as long as needed to fulfil the purposes outlined in the 'Legal Grounds and Purposes of Processing' sections.

When determining the relevant retention periods, we will take into account factors including:

- our contractual obligations and rights in relation to the information involved;
- legal obligation(s) under applicable law to retain data for a certain period of time;
- statute of limitations under applicable law(s);
- our legitimate interests for your benefit;
- (potential) disputes; and

- guidelines issued by relevant data protection authorities.

YOUR RIGHTS

Under data protection law, you have a number of rights concerning the data we hold about you. If you wish to exercise any of these rights, please contact our general support team using the contact details set out above. For additional information on your rights please see below.

The right to be informed. You have the right to be provided with clear, transparent and easily understandable information about how we use your information and your rights. This is why we are providing you with the information in this policy.

The right of access. You have the right to request certain information about, access to and copies of your personal information (if we are processing it). Please note that you are entitled to request one detailed summary of that personal information at no cost, but for any further costs we reserve the right to charge a reasonable fee based on administration costs.

The right to rectification. You are entitled to have your information corrected if it is inaccurate or incomplete.

The right to erasure. This is also known as ‘the right to be forgotten’ and, in simple terms, enables you to request the deletion or removal of certain of the information that we hold about you. However, please note that this will not apply if we are required to retain the information for compliance with a legal obligation.

The right to restrict processing. You have rights to request that we stop using your personal information or limit the way in which we use it. When processing is restricted, we can still store your information, but will not use it further.

The right to data portability. You have the right to request that we return your personal information in an accessible and transferrable format, or that we send it directly to another company, where technically feasible;

The right to lodge a complaint. You have the right to lodge a complaint about the way we handle or process your information with your national data protection authority. If you are in the UK, this is the ICO - <https://ico.org.uk>. The postal address is Information Commissioner’s Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF.

The right to withdraw consent. If you have given your consent to anything we do with your information (i.e. where we rely on consent as a legal basis for processing your information), you have the right to withdraw that consent at any time. Please note this may impact our ability to provide services or to otherwise continue our relationship with you.

The right to object to processing. You have the right to object to certain types of processing where we use it for our legitimate interests or for marketing purposes.

10. CHANGES TO OUR PRIVACY POLICY

Any changes to our privacy policy will be posted to our website and, where appropriate, we will notify you of the changes for example by email or push notification. This privacy policy was last updated in November 2022.

ANY VISITOR TO OUR WEBSITE

1. INFORMATION WE COLLECT FROM YOU

- your IP address;
- other location data;
- device information, such as your hardware model, mobile network information, unique device identifiers;
- how long you spend on different parts of our website;
- your cookie preferences;
- any information you submit to us via email; and
- any other personal information that you send to us.

2. HOW WE COLLECT YOUR INFORMATION

We collect information when you:

- visit our website, browse its pages, or when you return; and/or
- submit a message to us via email.

Some of the information is collected by a third-party website analytics service provider on our behalf and/or may be collected using cookies which are active on our website. These cookies help us to provide you with a good experience when you are browsing, and also help us to improve our website. For more information on cookies and what you can do to disable certain cookies on our website, please read our [Cookie Policy](#).

3. LEGAL GROUNDS AND PURPOSE OF PROCESSING

It is in our legitimate business interests to do so: to consider and respond to your message or request.

Consent: where we have requested your consent and you have provided it.

DIRECTORS, SHAREHOLDERS OR ULTIMATE BENEFICIAL OWNER OF RTP GLOBAL UK OR AN INVESTMENT COMPANY

1. INFORMATION THAT WE COLLECT FROM YOU

We collect the following information about you:

- your name;
- residential address;
- email address;
- a copy of your passport or Government issued ID;
- source of wealth;
- other directorships or shareholding;
- your job title;
- your company or organisation; and
- any other personal information that you or your agents send to us.

2. HOW WE COLLECT YOUR INFORMATION

We collect your personal information during our mandatory compliance processes and as part of our ongoing compliance checks. We collect information from your agents, providers of know your customer and customer due diligence tools (such as LexisNexis) as well as conducting our own public searches and checks (including internet searches).

3. LEGAL GROUNDS AND PURPOSES OF PROCESSING

It is in our legitimate business interests to do so: to facilitate our selection of the portfolio investment company, keep internal records for administration purposes; and/or to defend legal claims or otherwise protect our rights as a business.

Compliance with a legal obligation: in order to prevent fraud or money laundering or to comply with any other legal or regulatory requirements.

4. HOW WE SHARE INFORMATION

In addition to the parties set out in section 5 at the front of this privacy policy, the personal information we are holding about you may on the legal grounds set out in this privacy policy be shared with and processed by banking institutions, service providers, portfolio companies and investors of portfolio companies.

FOUNDER OF AN INVESTMENT COMPANY

1. INFORMATION THAT WE COLLECT FROM YOU

We collect the following information about you:

- your name;
- residential address;
- email address;
- passport or Government issued ID;
- marital status;
- nationality and any former nationality;
- source of wealth;
- your job title;
- your company or organisation;
- date of birth;
- details of any criminal conviction;
- full details of any injury or illness which has required in-patient hospital treatment for a period in excess of four weeks (where you have provided your consent); and
- any other personal information that you supply to us.

2. HOW WE COLLECT YOUR INFORMATION

We collect your personal information when you complete a founder questionnaire. We also collect information from your agents, providers of know your customer and customer due diligence tools (such as LexisNexis) as well as conducting our own public searches and checks (including internet searches).

3. LEGAL GROUNDS AND PURPOSES OF PROCESSING

It is necessary for the performance of our contract or for the purposes of entering into a contract: in order to negotiate, enter into and undertake our contractual obligations with you personally.

It is in our legitimate business interests to do so: to facilitate the selection of the investor that we will partner with; to keep internal records for administration purposes; to enforce our contractual terms with you or the investment company; to defend legal claims or otherwise protect our rights as a business.

Compliance with a legal obligation: in order to prevent fraud or money laundering or to comply with any other legal or regulatory requirements.

Consent: where we have requested your consent and you have provided it.

RTP GLOBAL UK EMPLOYEES (INCLUDING PROSPECTIVE AND FORMER EMPLOYEES)

1. INFORMATION THAT WE COLLECT FROM YOU

We collect the following information about you:

- your name;
- email address;
- residential address
- gender;
- date of birth;
- employment status;
- employment history and experience (both personal and professional);
- references from previous employers;
- academic history;
- interview notes;
- salary and benefits (bank account details, income, tax reference number, social insurance number, tax declaration, ARC Certificate);
- next of kin and family/dependents;
- sickness and absence records (including sensitive information regarding your physical and/or mental health);
- passport or Government issued ID;
- nationality and immigration status;
- pension arrangements, loans, increases;
- grievance or disciplinary records, appraisals and performance reviews;
- CCTV images of you entering or leaving our office premises;
- time and attendance records; and
- other personal information that you may supply to us.

2. HOW WE COLLECT YOUR INFORMATION

We collect information when you:

- make an application to work for us, or attend an interview with us;
- attend our offices in person (via CCTV); or
- commence working with us.

We receive information from recruitment agencies, as well as conducting our own public searches and checks (including internet searches).

3. LEGAL GROUNDS AND PURPOSE OF PROCESSING

It is necessary for the performance of our contract or for the purposes of entering into the contract: in order to negotiate, enter into and undertake our contractual obligations connected with your employment.

It is in our legitimate business interests to do so: to keep employment records for administration purposes; to assess your continued suitability for a role and planning progression; to prevent crime and maintain a safe environment for staff and visitors (insofar as our use of CCTV at the RTP Global UK office is concerned); for promoting the business publicly; to contact you (and other individuals) and to enforce our contractual terms with you and to defend legal claims or otherwise protect our rights as a business.

Compliance with a legal obligation: to comply with legal or regulatory requirements including in connection with visa applications or work permits.

SPECIAL CATEGORIES OF INFORMATION

In respect of any information about your health (including any medical condition, health and sickness records such as details of absences from work including time on statutory parental leave or sick leave), to the extent that you are a UK-based employee of RTP Global UK, we will process such special categories of personal data on the following legal grounds:

- **Pursuant to Schedule 1, Part 2(8) of the UK Data Protection Act 2018**, we will use information relating to leaves of absence, which may include sickness absence or family related leaves, to comply with employment and other laws. We will use information about your physical or mental health, or disability status, to ensure your health and safety in the workplace and to assess your fitness to work, to provide appropriate workplace adjustments, to monitor and manage sickness absence and to administer benefits including statutory maternity pay and statutory sick pay.
- We do not need your consent if we use special categories of your personal information in accordance with our written policy to carry out our legal obligations or exercise specific rights in the field of employment law. In limited circumstances, we may approach you for your written consent to allow us to process certain particularly sensitive or other personal data. If we do so, we will provide you with full details of the information that we would like and the reason we need it, so that you can carefully consider whether you wish to consent. You should be aware that it is not a condition of your contract with us that you agree to any request for consent from us.

4. HOW WE SHARE INFORMATION

In addition to the parties set out in section 5 of the front of this privacy policy, personal information we are holding about you may on the legal grounds set out in this privacy policy be shared with and processed by payroll providers.

5. CCTV

We use CCTV at our offices. Further information is available at our offices or otherwise on request at dataprotection@rtp.vc.

VISITORS TO OUR OFFICE PREMISES

1. INFORMATION THAT WE COLLECT FROM YOU

We collect the following information about you:

- your name;
- employer's name;
- the purpose of your visit;
- CCTV images of you entering or leaving our office premises; and
- other personal information that you may supply to us.

2. HOW WE COLLECT YOUR INFORMATION

The front office desk team of our co-working office space may provide us with the details that you provide to them at reception.

3. LEGAL GROUND AND PURPOSE OF PROCESSING

It is in our legitimate business interests to do so: to keep an up-to-date record of visitors attending our offices; and to prevent crime and maintain a safe environment for staff and visitors (insofar as our use of CCTV at the RTP Global UK office is concerned).

4. HOW WE SHARE INFORMATION

In addition to the parties set out in section 5 of the front of this privacy policy, personal information we are holding about you may on the legal grounds set out in this privacy policy be shared with and processed by law enforcement bodies.

5. CCTV

We use CCTV at our offices. Further information is available at our offices or otherwise on request at dataprotection@rtp.vc.