

# PRIVACY NOTICE

## 1. Introduction

This privacy notice has been prepared by Hargreave Hale AIM VCT plc ("the HH VCT", "we", "us" or "our"). We are committed to protecting the privacy of individuals whose data we process ("you" or "your").

This privacy notice explains how the HH VCT will collect and process your personal data as a controller of data supplied by shareholders and potential investors with holdings in and/or investing in the HH VCT, including through your use of our website and by sending us correspondence, subscription forms or other materials submitted to us in the course of your relationship with us.

In addition this privacy notice has been updated to comply with, and outlines your data protection rights under, the provisions of applicable data protection law, including the General Data Protection Regulation (Regulation 2016/679) as it forms part of the laws of the UK by virtue of section 3 of the European Union (Withdrawal) Act 2018 and as amended by the Data Protection, Privacy and Electronic Communications (Amendments etc) (EU Exit) Regulations 2019 (the "UK GDPR") and the Data Protection Act 2018.

This website is not intended for children and we do not knowingly collect data relating to children.

## 2. Who We Are

- a. Our full contact details are: Hargreave Hale AIM VCT plc, Talisman House, Boardmans Way, Blackpool, England, FY4 5FY. The registered company number is 05206425.
- b. The HH VCT does not currently have a mandatory requirement to appoint a DPO, however, the Board takes responsibility for overseeing questions in relation to this privacy notice and for ensuring the HH VCT has in place policies and practices in accordance with the UK GDPR.
- c. The HH VCT is party to an investment management agreement with Hargreave Hale Limited ('HHL') and an offer agreement and administration agreement with Canaccord Genuity Wealth Limited ('CGWL'). Each of HHL and CGWL (together with the other services providers set out in this privacy notice) conduct data processing activities on behalf of the HH VCT in accordance with this privacy notice.

- d. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact [aimvct@canaccord.com](mailto:aimvct@canaccord.com) or write to the address above marked for the attention of the VCT Department.

### 3. Important Information

- a. This privacy notice was last amended on 27 July 2022. It supersedes any earlier versions. We may update this privacy notice from time to time, and will communicate such updates through our website. We may also notify you from time to time about the processing of your data.
- b. It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data.
- c. It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us. You can ask us to rectify or update your personal information at any time by contacting our administrator at [aimvct@canaccord.com](mailto:aimvct@canaccord.com).
- d. The HH VCT's website (which is hosted by CGWL) may include links to third party websites, plug-ins or applications which may allow third parties to collect or share your personal data. We are not responsible for their use of your personal data and cannot control it. When you leave our website, we encourage you to read the privacy notice of every website you visit.

### 4. The Data We Collect About You

- a. Personal data, or personal information, means any information about an individual from which that person can be identified.
- b. We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:
  - i) **Identity Data** including name, title, nationality, marital status, age/date of birth, gender, specifically including client ID / anti money laundering documentation such as your passport, driving licence or birth certificate.
  - ii) **Contact Data** including postal addresses, email addresses and telephone numbers.
  - iii) **Financial Data** including bank account details, payment card details, information contained within bank statements and bills and other information provided for client ID / anti money laundering checks.
  - iv) **Transaction Data** including details about payments to and from you and other details of products or services you have purchased from us and/or we have provided to you.

- v) **Usage Data** this may include information about how you use our website, the full uniform resource locators, clickstream to, through and from our website (including date and time), download errors, lengths of visit to certain pages, page interaction information and methods to browse away from our website.
  
  - vi) **Technical Data** this may include internet protocol (IP) address, your login data, browser type and version, time zone setting, location data, device cookie and identification, browser plug-in types and versions, operating system and platform and other identifying information required for your device to communicate with our website.
  
  - vii) **Communications Data** including your preferences in receiving marketing from us and your communication preferences.
- c. We may also collect, use and share aggregated data such as statistical or demographic data for any purpose. This may be derived from your personal data but is not legally considered personal data as it does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the number of investors in the HH VCT. If we combine or connect aggregated data with your personal data so that it can directly or indirectly identify you, then we treat the combined data as personal data which will be used in accordance with this policy.
- d. We do not collect any special categories of personal data about you (i.e. details about your race, ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Other than any information that we may collect as part of client ID / anti money laundering / compliance activity, we do not collect any information about criminal convictions and offences.
- e. Where we need to collect personal data by law, or under the terms of a contract we have 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, if you send us money but do not provide the required proof of identification documentation for anti-money laundering purposes). In this case, we may not be able to provide you with what you have requested from us but we will notify you if this is the case at the time.

## 5. How is Your Personal Data Collected

- a. We use different methods to collect data from and about you including:
  
- b. **From you directly.** You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
  - i) request information about one of our products or services;
  
  - ii) invest in one of our products; or

iii) telephone or email us or provide information or feedback.

c. **From third parties.** We may receive equivalent personal data about you from your financial intermediary or financial advisor or other relevant third party.

d. **From our website.** We may receive personal data, including usage data and technical data, through your access to and use of our website. Our website is hosted by CGWL and as such this personal data is collected by and shared with CGWL.

**6. How we use Your Personal Data**

a. In the table below we have summarised the ways that we use your personal data and the purposes for which we will use it. If we need to process your personal data for a different purpose that is not compatible with the original purpose, then we will let you know.

b. We may process your personal data for a different purpose than listed below and without your consent where it is necessary for us to comply with our legal obligations.

c. We may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us at [aimvct@canaccord.com](mailto:aimvct@canaccord.com) if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To contact you.	Identity  Contact  Financial  Transaction  Communications	Performance of a contract or potential contract with you  Necessary for our legitimate interests (for running the HH VCT, to keep our records updated and to study how individuals use our website/services)
To update and maintain records for the HH VCT, including maintaining statutory registers.	Identity  Contact  Financial	Necessary to comply with a legal obligation

<p>To register you as a new shareholder.</p>	<p>Identity</p> <p>Contact</p> <p>Financial</p>	<p>Performance of a contract or potential contract with you</p>
<p>To facilitate the investment in our products.</p>	<p>Identity</p> <p>Contact</p> <p>Financial</p> <p>Transaction</p> <p>Communications</p>	<p>Performance of a contract or potential contract with you</p> <p>Necessary for our legitimate interests</p>
<p>To verify your identity, verify your eligibility for certain products or services, credit reference checks, prevent or detect fraud or money laundering.</p>	<p>Identity</p> <p>Contact</p> <p>Financial</p> <p>Transaction</p>	<p>Performance of a contract or potential contract with you</p> <p>Necessary to comply with a legal obligation</p> <p>Necessary for our legitimate interests (to prevent being defrauded)</p>
<p>To manage our relationship with you, which may include:</p> <p>Provide you with monthly fact sheets</p> <p>Asking you to leave a review or take a survey</p>	<p>Identity</p> <p>Contact</p> <p>Profile</p> <p>Communications</p>	<p>Performance of a contract or potential contract with you</p> <p>Necessary to comply with a legal obligation</p> <p>Necessary for our legitimate interests (to keep our records updated and to study how shareholders use our website/services)</p>

Notifying you about changes to our terms or privacy policy		
To provide customer support	Identity  Contact	Performance of a contract with you
To scan and monitor emails sent to us (including attachments) for viruses or malicious software, to process and encrypt personal data to protect and manage email traffic, and to store personal data on our systems	Identity  Contact	Necessary for our legitimate interests (including to protect our business and systems and for document retention purposes)
For the operation of our website including to monitor visitors to our website.	Usage Data  Technical Data	Necessary for our legitimate interests (including operating and monitoring our website to promote our business activities)
Such other actions as are necessary to manage our activities, including by processing instructions, monitoring and recording electronic communications (including telephone calls and emails)	Identity  Contact	Necessary to comply with a legal obligation  Necessary for our legitimate interests (including for quality control, analysis and training purposes and enforcing or defending our rights and/or interests)

## 7. Marketing

- a. Except as set out below in specific limited circumstances, we do not currently undertake marketing activities to retail clients.
- b. You will only receive marketing communications from us if you (a) have requested information from us, and/or (b) have invested in the HH VCT or you provided us with your details when you registered for a particular promotion, in which case we may send you communications relating to similar promotions, provided that in each case, you have not opted out of receiving that marketing.

You can ask us to stop sending you marketing messages at any time by:

- i) following the opt-out links on any marketing message sent to you; or
  - ii) contacting us at any time using the details at [aimvct@canaccord.com](mailto:aimvct@canaccord.com).
- c. If you do withdraw your consent, this will result in us ceasing to directly market goods and services to you, but we will still process your personal data in order to fulfil our contract with you and in accordance with our legal, accountancy and regulatory obligations.
- d. We will get your express opt-in consent before we share your personal data outside the HH VCT for marketing purposes. You have the right to withdraw consent for us to pass your information to third parties for marketing purposes. If you no longer wish to be contacted by third parties for marketing purposes, please follow the instructions in their marketing communications, or consult their privacy policies about how to unsubscribe.
- e. If you are a current investor, we may send you service communications for administrative or customer service purposes (but this is not considered marketing).

## **8. Cookies**

- a. Like other organisations, we may collect data about how you use our website (which is hosted by CGWL) in order to help us improve future functionality. Additionally, we may pass your personal data to online advertising tools including Google Analytics, Google Adwords, Facebook Pixel, Lotame and Yahoo Analytics.
- b. You can opt out of third party vendor's use of cookies by visiting <http://optout.networkadvertising.org/?c=1#!/>. You can also set your browser to refuse all or some browser cookies, or to alert you when website 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 more information about the cookies we use, please see our Cookie Policy <http://www.canaccordgenuity.com/wealth-management-uk/privacy-policy/>.

## **9. Disclosures of Your Personal Data**

- i) We may share your personal data with external third parties on an as necessary basis for the purposes set out in the table at paragraph 5 above, such as:
  - (1) Your financial and other professional adviser(s), any relevant financial intermediary, financial administration platforms or aggregators or financial promoter;
  - (2) Auditors, administrators, investment managers, receiving agents, our company secretary and/or other third parties who assist the HH VCT in relation to its investment products (such as CGWL (who perform services on our behalf (including administration and receiving agent services and other services in connection with investment in the HH VCT), Hargreave Hale Limited (our investment manager) and Portunus (who are appointed by CGWL on behalf of

the HH VCT to provide promotion services) registrars, printers and Companies House;

- (3) The FCA, HM Revenue & Customs, National Crime Agency, any other relevant regulators and other authorities based in the United Kingdom who require reporting of processing activities in certain circumstances;
  - (4) IT service providers, including CGWL who host our website;
  - (5) Other third parties such as anti-money laundering, client ID and/or credit checking agencies, which may be based outside of the UK; and/or
  - (6) Third parties to whom we may seek to sell, transfer or merge with. Alternatively, we may seek to acquire or merge with them. If a change happens to the HH VCT, then the new owners may use your personal data in the same way as set out in this privacy notice.
- b. We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and we only permit them to process your personal data for specified purposes and in accordance with our instructions (which are set out in an appropriate contract).

## **10. International Transfers**

- a. Whenever we transfer your personal data out of the UK, first of all we only do this when necessary and secondly we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:
  - i) We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the UK Secretary of State; or
  - ii) Where we use certain service providers, we use specific contracts with model clauses approved by the UK Secretary of State.
- b. Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the UK.

## **11. Data Security**

Once we have received your personal data we will use reasonable and necessary procedures and security features to try and prevent unauthorised access. For example, we limit who can access your personal data to those individuals and third parties who need to know it and who are subject to a duty of confidentiality. If we become aware of a data breach we will notify the Information Commissioner's Office unless we consider that the breach is unlikely to result in a risk to your rights and freedoms. If we believe that the data breach is likely to result in a high risk to your rights and freedoms, we will notify you in accordance with our legal requirements.



## 12. Data Retention

- a. We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.
- b. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements. We have a data retention policy which is available on request, please contact us at [aimvct@canaccord.com](mailto:aimvct@canaccord.com) if you would like a copy.
- c. In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you. In some circumstances you can ask us to delete your data: see 13.a.iii) below for further information.

## 13. Your Legal Rights

- a. Under data protection laws you have the right to protect and look after your personal data. You have the right to:
  - i) ask us for the personal data that we hold and process about you (this is often referred to as a data subject access request);
  - ii) ask that any inaccurate information we hold about you is corrected;
  - iii) ask that we delete or restrict the personal data we hold about you in certain situations;
  - iv) ask that we stop using your personal data for certain purposes;
  - v) ask that we do not make decisions about you using completely automated means; and/or
  - vi) ask that personal data we hold about you is given to you, or where technically feasible a third party chosen by you, in a commonly used, machine-readable format.
- b. If you wish to exercise any of the rights set out above, please contact us at [aimvct@canaccord.com](mailto:aimvct@canaccord.com). The rights listed above may apply in certain circumstances, and so we may not always be able to comply with your request to exercise these rights.
- c. We will usually respond to a request from you to exercise your rights within 1 month of receipt, but it might take longer if your request is particularly complex or if you have made a number of requests. Please be aware that we may need to process your personal data and/or request specific information from you to help us comply with your request. You will not usually have to pay a fee to exercise these rights, but we reserve

the right to if your request is clearly unfounded, repetitive or excessive, alternatively we may refuse to comply with your request.

#### **14. Complaints and Feedback**

If you would like to speak to us about how we handle your personal data, please contact [aimvct@canaccord.com](mailto:aimvct@canaccord.com) in the first instance. You can also complain to the Information Commissioner's Office who is the UK supervisory authority for data protection issues. We would, however, appreciate the opportunity to deal with your concerns before you approach Information Commissioner's Office.