



## GDPR PRIVACY NOTICE

This Privacy Notice applies to the website [www.CovalisCapital.ky](http://www.CovalisCapital.ky), as well as any subdomains and any other websites on which this Notice is posted, and any content from or through the websites operated by Covalis Capital LLP of 2<sup>nd</sup> Floor, 11 Charles II Street, London SW1Y 4QU (“Covalis Capital”, “we” or “us”), and which is the Data Controller of the personal data provided via this website (“Personal Data”). This Privacy Notice describes how Covalis Capital collects, uses, shares and secures the personal information you provide via this website (i.e. by email). It also describes the choices available to you regarding our use of your Personal Data and how you can access and update this information.

### 1. Personal data we may collect

In order to provide you with information about Covalis Capital and its funds and associated investment opportunities it may be necessary for Covalis Capital to process certain personal information such as names, telephone numbers and email addresses and any personal identification documents you supply in order to confirm your identity and circumstances.

Covalis Capital may collect a variety of Personal Data via any email address listed on the website. This Personal Data may include information such as name, email address, mailing address, phone number.

We may use this information for our legitimate business interests, including to:

- send you requested business, product or service information;
- respond to queries and requests;
- administer and manage delivery of our services and products to you; and
- comply with our legal and regulatory obligations.

### 2. How we collect this data

Covalis Capital may collect personal data through a range of means. These may include:

- direct interactions (where you provide personal data to Covalis Capital via telephone or email correspondence or other direct methods of communication, including applications to invest in Covalis Capital’s funds or for prospective employment);
- from third parties such as intermediaries and banks in the case of prospective investors or third party recruitment firms in the case of prospective employees; and/or
- other publicly available sources (such as websites (for example, LinkedIn), or online registers (for example, FCA or other regulatory registers).

### 3. Information Sharing

We will only share your Personal Data with third parties in the ways set out in this Notice.



We do not sell your Personal Data to third parties for them to market their services to you. We may provide your Personal Data to our service providers to help us with our business activities. In all cases we will have a written data processor agreement with these companies safeguarding your Personal Data, including that it may only be processed for the purposes of that agreement and on our instructions.

We may also disclose your Personal Data:

- as required by law, such as to comply with a subpoena, or similar legal process;
- as permitted by law, such as when we believe in good faith that disclosure is necessary for our legitimate interest such as investigating fraud, to make or defend a legal claim, to protect your safety or the safety of others, or to maintain our compliance or that of our personnel with applicable laws and regulatory requirements, in accordance with applicable law; and/or
- in other situations, only with your prior consent.

#### **4. Transfers outside the EEA**

We may transfer your Personal Data to service providers or other entities outside the European Union for the purposes set out in this Notice. We will put in place appropriate measures to safeguard Personal Data transferred, and by providing your Personal Data you consent to such transfer.

#### **5. Your Rights**

You have the right to ask whether Covalis Capital processes your Personal Data and to request a copy, to object to direct marketing and in certain circumstances to have the data rectified or blocked. To request this information, please email [compliance@covaliscapital.com](mailto:compliance@covaliscapital.com). If your personal information changes, or if you no longer desire our services, you may ask to have your Personal Data corrected, amended, removed or deleted by emailing [compliance@covaliscapital.com](mailto:compliance@covaliscapital.com).

You also have the right to object to direct marketing and, under certain circumstances, to object to our processing of your Personal Data. You may choose to stop receiving communications such as our newsletters by following the unsubscribe instructions included in such emails or by contacting us at [compliance@covaliscapital.com](mailto:compliance@covaliscapital.com).

#### **6. Cookies and Website Analytics**

Covalis Capital does not collect cookies or use any other means (e.g. website analytics) which may serve to directly or indirectly identify you.

#### **7. Security**

The security of your Personal Data is very important to us. We follow all applicable legal and regulatory requirements in protecting the Personal Data provided to us, both during transmission and once we receive it. No method of transmission over the Internet, or method of electronic storage, is 100% secure, however. If you have any questions about the security of your Personal Data, please contact [compliance@covaliscapital.com](mailto:compliance@covaliscapital.com).



## **8. Retention**

We will retain your information for the longer of the period we are required to do so by law, as is reasonably necessary for the purpose (for example to comply with our legal obligations, resolve disputes, and enforce our agreements), or as needed to provide you services.

## **9. Updates to this Notice**

We may update this Privacy Notice to reflect changes to our information practices; where we do so the updated Notice will be published on our website.

## **Telephone Recording**

Telephone and other electronic communications made to or from Covalis Capital may be recorded by us in order to comply with our regulatory obligations.