



PRIVACY AND COOKIE POLICY

Last updated 26/06/2018

This Privacy Policy applies to your access and use of the Website www.artheocapital.com. It constitutes a legal agreement between you, the user, and Artheo Capital Partners LIMITED, as the owner and operator of the Website. Throughout this Privacy Policy we will refer to you as "you", and we will refer to Artheo Capital Partners LIMITED as "we", "us", "Our Site", "Artheo Capital" or "Artheo Capital Partners". This policy is incorporated into and subject to the Artheo Capital Partners Terms of Use (the "Terms").

We are committed to protecting and respecting your privacy.

This policy only applies to information collected on the Site and is not intended to fully describe the privacy policies of Artheo Capital Partners. This policy sets out:

1. How we collect and use the personal data you submit to www.artheocapital.com
2. Your options with respect to our use of your personal data and how you can access and update this information (see "Your rights" section for more details).

INFORMATION WE MAY COLLECT FROM YOU

Personal information

Generally you can visit the Site without telling us who you are or revealing any Personal information. When we use the term "Personal Information," we mean information that can be associated with a specific person and can be used to identify that person, such as your name, e-mail address, mailing address, mobile phone number, age, gender, date of birth.

Business information

However if you choose to fill in forms or accept cookies, we may collect and process the following data about you:

- Information that you provide to us by completing forms on our site www.artheocapital.com and mobile applications ("Our Site"). This includes contact information such as name, email address, mailing address, phone number; background information such as experience and expertise; unique identifiers such as user ID and password; and preferences information such as shortlists, investment criteria and deal history. If you choose to list a pitch on Our Site, we will ask for information about your business such as company name, company size, business type and team members.
- Information that you provide to us when you write to us (including by email).
- Information that you provide to us when we speak to you by telephone. We may make and keep a record of the information you share with us.
- Information that you provide to us by completing surveys.



Cookies Information

When you use the Site, we may send one or more Cookies (which are small text files containing a string of alphanumeric characters) to your computer or mobile device, to help analyse our web page flow, customize our content, measure promotional effectiveness, and promote trust and safety. You are always free to decline our cookies if your browser permits, although doing so may interfere with your ability to use the Site or certain features of the Site. We may also use Google Analytics or a similar service that uses Cookies to help us analyse how users use the Site.

Automatically collected information

As is true of most web sites, we gather certain information automatically and store it in log files. This information includes internet protocol (IP) addresses, browser type, internet service provider (ISP), referring/exit pages, operating system, date/time stamp, and clickstream data. We use this information, to analyse trends, to administer Our Site, to track users' movements around Our Site (such as total number of visitors and pages viewed) and to gather demographic information about our user base as a whole.

HOW WE USE YOUR INFORMATION

We may use your information as follows:

- To carry out our obligations arising from (i) legal obligations and/or (ii) for administrative purposes such as to honour agreements with you and us.
- To send you information, products or services that may be of interest to you.
- To present content from Our Site in the most suitable way for you and your device.

Please contact us on info@artheocapital.com if you do not want your data used in one or more of the ways described above. There is further guidance on this in the 'Your Rights' section of this policy.

COOKIES and Other Tracking Technologies

Technologies such as: cookies, beacons, tags and scripts are used by Artheo Capital Partners Limited and our partners, including marketing partners affiliates, or analytics service providers and business process service providers. These technologies are used in analysing trends, administering Our Site, tracking users' movements around Our Site and to gather demographic information about our user base as a whole. We may receive reports based on the use of these technologies by these companies on an individual as well as aggregated basis. We use cookies to estimate our audience size and usage pattern; to store information about your preferences, and so allow us to customize Our Site according to your individual interests; to speed up your searches; and to recognize you when you return to Our Site. Users can control the use of cookies at the individual browser level. If you reject cookies, you may still use Our Site, but your ability to use some features or areas of Our Site may be limited.



DISCLOSURE OF YOUR INFORMATION

We may disclose your personal data to any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries. We do not sell your personal data to third parties. We share your data with third parties only in the ways outlined in this privacy policy.

We may also disclose your personal data to third parties in the following situations:

- If we sell, carve-out, demerge or buy any business or assets, we may disclose your personal data to the prospective seller or buyer of such business or assets. We will notify you of any change in ownership or uses of your personal data, as well as any new choices regarding your personal data, by email or prominent notice on Our Site.
- If Artheo Capital Partners Ltd or substantially all of its assets are acquired by a third party, the personal data held by it about its customers will be one of the transferred assets.
- If we are, or believe that we are, under a duty to disclose or share your personal data to comply with any legal obligation; or permitted by law to enforce or apply our Terms and Conditions of Website Use and other agreements; or to protect the rights, property, or safety of us, or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction.
- If we have a good faith belief that doing so is appropriate or necessary to take precautions against liability; to protect Milestone Partners from fraudulent, abusive, or unlawful uses or activity; to investigate and defend ourselves against any third party claims or allegations; to assist government enforcement agencies; to protect the security or integrity of the Site; or to protect the rights, property, or personal safety of Milestone Partners, our partners, or others.
- To comply with various reporting obligations, and for business or marketing purposes. When possible, we provide this information in an anonymised way.

We may provide your personal data to companies that provide services to help us with our business activities such as legal advisors or processing payments.

YOUR RIGHTS

You have the right to access information that is held about you. We will take reasonable steps to verify your identity before providing copies of any relevant materials in order to protect your privacy and security.

You may be entitled to ask us: to amend or delete your information; for a copy of your information; to transfer some of this information to other organizations; to restrict or stop the processing of information; to withdraw consent (where we have previously asked for your consent to process your data). Where information must be retained to comply with legal obligations such as to provide evidence of anti-money laundering compliance or tax compliance, consent may not be required.



In other situations – for example, where we can prove a legal right to process your data – your rights may be limited. In some cases, we may be able to retain your data even if you withdraw your consent. Where we require information to comply with legal or contractual obligations, then provision of such data is mandatory: if such information is not provided, then we will not be able to meet obligations placed on us or manage your transactions on Our Site. In all other cases, provision of requested information is optional.

In the interests of transparency, we are happy to answer any queries relating to how we process your information and resolves any complaints you may have. You are entitled to raise any matter with the relevant data protection authority, but we encourage you to approach us first.

How to exercise your rights

To access or exercise any of the other above rights, email info@artheocapital.com

HOW LONG WE RETAIN YOUR INFORMATION

We will retain your information for as long as needed to provide you services. We will retain and use your information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements, which in some cases involving the collection and processing of financial data may require a retention period of 7 years (or longer if required by law).

DATA SECURITY

We use certain physical, managerial, and technical safeguards that are designed to protect the integrity and security of your information. We retain information as long as it is reasonably necessary and relevant for our operations, and/or to comply with the law, prevent fraud, collect any fees owed, resolve disputes, troubleshoot problems, assist with any investigation, or enforce our Terms or other agreements.

We cannot ensure or warrant the security of any information you transmit to us through the Site, and you do so at your own risk. We also cannot guarantee that such information may not be accessed, disclosed, altered, or destroyed by breach of any of our physical, technical, or managerial safeguards. No security measures are perfect or impenetrable. We cannot control the actions of other users or other third parties with whom you may choose to share your information. Therefore, we cannot and do not guarantee that information you provide through the Site will not be viewed by unauthorized persons. We are not responsible for circumvention of any privacy settings or security measures contained on the Site. Even after removal, copies of information that you have posted may remain viewable in cached and archived pages or if other users have copied or stored such information.

When you enter sensitive on Our Site, we encrypt the transmission of that information using secure socket layer technology (SSL).



We follow generally accepted standards to protect the personal data submitted 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. Therefore, we cannot guarantee its absolute security. If you have any questions about security on Our Site, you can contact us on info@artheocapital.com

ADDITIONAL PRIVACY INFORMATION

Referrals

If you choose to use our referral service to tell a contact about Our Site, we will ask you for your contact's name and email address. You must have consent from your contact to provide this information to us. We will automatically send your contact a one-time email inviting him or her to visit the site. Our Site stores this information for the sole purpose of sending this one-time email and tracking the success of our referral program. Your contact may contact us info@artheocapital.com to request that we remove this information from our database.

Links to 3rd Party Sites

Our Site may, from time to time, contain links to and from the websites of our suppliers, partner networks, advertisers, affiliates and other third parties. If you follow a link to any of these websites, please note that these websites should have their own privacy policies and we do not accept any responsibility or liability for these policies or the content or operation of these websites. Please check these policies and the terms of the websites before you submit any personal data to these websites.

CHANGES TO OUR PRIVACY POLICY

We reserve the right to make changes to this Privacy Policy at any time. We will notify you about significant changes in the way we treat your information, including by placing a prominent notice on the Site or by sending you an email so that you can choose whether to continue using the Site. Material modifications are effective 30 calendar days after our initial notification or upon your acceptance of the modified Terms. Immaterial modifications are effective upon posting of the updated Privacy Policy or Terms of Service on the Site. Please revisit this page periodically to stay aware of any changes to this Privacy Policy. For the avoidance of doubt, disputes arising hereunder will be resolved in accordance with the Privacy Policy in effect at the time the dispute arose.

CONTACT

We welcome any queries, comments and requests regarding this privacy policy. You can reach us via email on info@artheocapital.com. In the event that you wish to see a copy of all of your Personal Data held by us, please write to: Data Protection Officer, Artheo Capital Partners, 20-22 Wenlock Road, London, England, N1 7GU.

Office Opening Times: Mon-Fri - 0900 to 1700 (GMT); Saturday/Sunday - CLOSED