

# Montagu Connect Platform Privacy Policy

## 1 Privacy Notice

The Montagu Connect Platform (the “**Platform**”) is operated by Montagu Private Equity LLP. We are committed to protecting your privacy in line with the applicable data protection legislation and in particular with data protection laws, including the Data Protection Act 2018 and the EU General Data Protection Legislation (EU 2016/679). This Platform Privacy Notice (the Notice) explains how Montagu Private Equity LLP, MPE Discretionary Management Partnership, Montagu Private Equity SAS, Montagu Private Equity Sp. z o.o., Montagu Private Equity GmbH, Montagu Luxembourg S.à r.l, MPE Manager Lux S.à.r.l and Montagu Full Potential Partners LLP (together, Montagu, we, us and our) collect and process personal information about you such as name, contact details, work details and other information provided by you in the course of your use of the Platform; how we use and protect this information; and the rights you may have in relation to this information. For the purposes of data protection legislation, Montagu acts as a controller of the personal data it collects.

This Notice operates in addition to, and does not form part of, the General Platform Terms & Conditions which can be found [here](#).

This Notice may change from time to time and we will notify you of any material changes to how we process your personal data.

If you have any questions, feel free to get in touch via one of the methods set out in the ‘Contact us’ section below.

## 2 Who does this Notice apply to?

This Notice applies to any natural person of whom we process personal information collected by us when you visit or post on this Platform and any other personal information you may provide to Montagu or which we acquire through your use of the Platform.

## 3 What personal information may we collect about you?

3.1 Account data: when you create your account, we will ask you to provide certain personal information to us, such as name (including name prefix or title), gender, job title/role, location, age, date of birth for the purposes set out in this Notice, including to enable us to provide you with information or respond to your enquiries (if any). You may also provide other information when building your profile, such as a profile image, employment history, professional interests and skills for the purposes set out in this Notice, including to enable us to identify topics of interest to you and to suggest other users with mutual professional interests.

3.2 Contact information: We may ask you to provide us with your contact information, such as email address, phone number or social media handles, for the purposes set out in this Notice including enabling us to respond to your enquiries (if any) or enabling you to register for e-mail alerts or receive push notifications.

3.3 Information we obtain by automated means: We may also collect certain information about you automatically when you use the Platform (using [cookies](#) or similar technologies), including information about your computer, software and IP address. This information enables us to estimate our audience size and usage patterns and store information about your preferences, and so allows us to customise the Platform according to your individual interests and recognise you when you return to the Platform. This information may be stored and used for administrative and monitoring purposes, or to gather statistical data about our users’ browsing actions and patterns.

3.4 Information obtained through communications: We collect information when you communicate with us or with other Platform members via the Platform functionality, including the Q&A functions and when you upload content to the Platform.

3.5 We may use third-party web analytics on this Platform, including through our use of [Google Analytics](#). These service providers help us analyse how you and other visitors use the Platform. Information obtained for this purpose and collected by automated means will be disclosed to or collected directly by these service providers. To learn about opting out of Google Analytics, please click [here](#).

3.6 When we obtain personal information about you using cookies, we will always ask for your consent first. If you decide that you no longer want Montagu to store cookies on your computer, you may refuse to accept cookies by activating the setting on your browser which refuses the setting of cookies. For instructions on how to do this, please check the support website for your browser. However, if you select this setting you may be unable to access certain parts or features of the Platform. Our systems will issue cookies when you enter the Platform unless you have adjusted your browser settings so that it will refuse cookies. For further information on how we use cookies, please refer to our [cookie policy](#).

#### **4 How do we use your personal information?**

We may use your personal information for the following purposes:

- 4.1 to provide the Platform services and functionality (including provision of technical support);
- 4.2 to further analyse, develop and improve the Platform and the user experience (for example, based on common issues);
- 4.3 to identify and contact you and facilitate contact between Platform members (via our members directory);
- 4.4 to verify your information;
- 4.5 to assess and respond to your enquiries and requests (if any);
- 4.6 to prevent and detect crime;
- 4.7 to provide you with information about the consulting services of Montagu Full Potential Partners LLP and our other services from time to time;
- 4.8 to conduct market research and to understand how our service may be improved for you;
- 4.9 to keep you up to date with the operation and development of the Platform, including service messages (for example, password retrieval), promotional messages (e.g. newsletters), and certain personalised content if requested (for example, personalised alerts and content notifications including in relation to any closed group memberships);
- 4.10 to carry out our legitimate business interests (as described below);
- 4.11 to comply with any relevant law, regulation or other requirements.

#### **5 On what legal basis do we use your personal information?**

We may use your personal information on the following bases:

- 5.1 Performance of the Platform service in accordance with the General Platform Terms & Conditions (performance of a contract);
- 5.2 for the legitimate business interests of Montagu, and in particular in relation to fund related activities for investors or potential investors; when reviewing or originating a potential fund portfolio company acquisition including performing due diligence; monitoring portfolio companies and fund performance; supporting management teams on improvement plans; maintaining existing (or potential) business relationships with external parties; or
- 5.3 you have consented to the processing of your personal information.

## 6 Information for marketing purposes

We use your information to identify products, services and events that we think may be of interest to you.

You have the right to ask us not to send you marketing messages by post, telephone or e-mail or any combination of these at any time. You can also let us know at any time that you wish to change your mind and to start receiving such messages.

You can do this:

6.1 by clicking the 'visit email preferences' link in the message or selecting managing email notifications in your account settings.

6.2 at any time by contacting us (see the 'Contact Us' section below).

## 7 With whom may we share your personal information?

In the course of conducting our day-to-day legitimate business we may share your personal information:

7.1 with (and, where appropriate, transfer it to) our group companies and affiliates;

7.2 with third party processors acting on our behalf such as those providing IT (including communications software), web-design, technical, HR, marketing and analytical services (for example, Google Analytics (please see [here](#) for more information on the data that Google may have access to));

7.3 with other third parties (e.g. regulators, law enforcement) acting as controllers;

7.4 with advisers, service providers, and agents acting for us in the course of our day-to-day business subject to agreement by them of confidentiality and security provisions; and

7.5 with such other parties and in any other way which does not identify you individually (including as part of an aggregated or anonymised dataset).

The Platform contains links to other websites which are not hosted or operated by us. These websites may use automated means to collect information regarding your use of the websites. This information is subject to the privacy policies or notices of the provider's website.

See the 'Protecting your personal information' section for information on how we keep your personal information secure when sharing it with others.

## 8 Transfers to third countries

8.1 Once we have received your information, we may store it in hard copy paper form and/or electronically. Your personal information may be transferred to, and stored at, a destination outside the UK which may not always have data protection laws providing equivalent protection, including:

8.1.1 Internal third parties: Montagu entities in Luxembourg, France, Germany & Poland; and

8.1.2 External third parties: the Platform is operated and hosted by Mobilize in the United States (US).

In such case, we will take steps to ensure that your information is protected by appropriate organisational and security measures, and that any such transfers are done using specific legally-approved safeguards (for example, standard contractual clauses).

You can request details of any relevant non-UK countries and a copy of the applicable safeguards by getting in touch using the details in the 'Contact Us' section below.

## 9 **Protecting your personal information**

We will use a variety of security measures and technologies to help protect your personal information from unauthorised access, use, disclosure, alteration or destruction, consistent with applicable privacy and data security laws. For example, when we transfer personal information to a third-party service provider, that provider will be carefully selected in accordance with our policies and procedures and will be required to enter into a contract which commits the provider to use appropriate safeguards in relation to the handling of your personal information. These safeguards include maintaining confidentiality of your personal information and implementing appropriate technical and organisational security measures.

Although we exercise adequate care and security, there remains a risk that information transmitted over the internet and stored digitally may be intercepted or accessed by an unauthorised third party.

## 10 **How long will we keep your personal information?**

We will actively review the information we hold and delete it securely, or in some cases anonymise it, when there is no longer a legal or business need for it to be retained. We will keep your information for as long as we need it for the purpose it is being processed for. The information may be retained so that we can continue to improve your experience with us and to ensure that you receive any information which would benefit you. We will also keep your personal information where we need to do so in connection with legal action or an investigation involving Montagu.

## 11 **Your rights**

Under certain circumstances, by law you have the right to:

- 11.1 ask Montagu about the processing of your personal information, including to be provided with a copy of your personal information;
- 11.2 request the correction and/or deletion of your personal information;
- 11.3 request the restriction of the processing of your personal information, or object to that processing;
- 11.4 request receipt or transmission to another organisation, in a machine readable form, of the personal information that you have provided to Montagu; and
- 11.5 complain to your local supervisory authority if your privacy rights are violated, or if you have suffered as a result of unlawful processing of your personal information. If you would like more information about your rights, or have any concerns about Montagu's processing of your personal information, please let us know by getting in touch with us using the details in the 'Contact us' section below. We will respond to your request within one month of receipt of your request. In some cases we may not be able to fulfil your request to exercise the right before this date, and may need to request more time. Where we cannot provide a full response to you for any reason, we will let you know about this in our initial reply to your request.

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). In some cases, we may charge a reasonable fee if your request for access is clearly unfounded or excessive, or if you request multiple copies of the information. Alternatively, we may refuse to comply with the request in such circumstances.

The various rights are not absolute and each is subject to certain exceptions or qualifications. Where you are given the option to share your personal information with us, you can always choose not to do so. If you object to the processing of your personal information, we will

respect that choice unless the processing of your personal information is based on our overriding legitimate grounds. If you object and we decide to stop processing your personal information, this could mean that we are unable to perform the actions necessary to achieve the purposes of processing described in the 'How do we use your personal information' section above. For further information on your rights and how to complain to the Information Commissioner's Office ("ICO), please refer to the ICO website at [www.ico.org.uk](http://www.ico.org.uk).

## 12 **Contact us**

If you have any questions or requests regarding this Notice or the personal information that we hold about you, or need additional information, please contact: Compliance Officer ([dataprotection@montagu.com](mailto:dataprotection@montagu.com))

Montagu Private Equity LLP  
2 More London Riverside  
London  
SE1 2AP  
UK

[The following companies are your data controllers and are responsible for the collection, use, disclosure, retention and protection of your personal information in accordance with our privacy standards as well as any applicable national laws.

Montagu Private Equity LLP  
2 More London Riverside  
London  
SE1 2AP  
UK

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