

Privacy Policy

Introduction

Our corporate website www.fasanara.com (referred to as the "Site") is owned by Fasanara Capital Ltd. This privacy policy (the "Privacy Policy") (together with our separate Internet Browsing and Cookies Policy) discloses our information gathering and dissemination practices. We reserve the right to modify this Privacy Policy at any time.

Fasanara Capital will use your personal data only for the purposes and in the manner set forth in this Privacy Policy which describes the steps taken to ensure our processing of your personal data is in compliance with the General Data Protection Regulation ((EU) 2016/679) ("GDPR") and any implementing legislation ("Data Protection Legislation").

Confidentiality

We will keep your information confidential and only use it within Fasanara, and only transfer it to third parties in the manner described in the below section labelled "Use of third parties", unless we are under a duty to disclose or share your personal data in order to comply with a court order or other legal or regulatory requirement.

How and why we collect personal data

Through our Site you may have an opportunity to send us information, such as through the "contact us" pages or any other area where you may send e-mails, request information or any query. By choosing to participate in these, you might provide us with some personal information.

We may also obtain personal information about you from third parties or through other business activities, such as attending conferences or exchanging business cards. We will in all cases endeavour to ensure you have the opportunity to read this Privacy Policy when processing your personal data.

The personal information we may collect might include your name, address, email address, company details and any other relevant information that may be included within correspondence. In addition, details of your visits to our Site including (but not limited to) IP address, cookies, traffic data, location data, weblogs and other information related to what pages are accessed and when may be collected.

If you are accessing sections of our Site that are password protected or have entered the Site through a link in an email, our Site will identify you as an individual and may collect data including information about the pages you visit, the documents you download or other information to enhance and personalise your future interaction with our Site.

Any information collected about you may be associated with other identifying information we hold. Certain online analytical data may be collected by using cookies in accordance with our Internet Browsing and Cookies Policy.

Fasanara Capital will retain and process your personal data only when this is necessary to achieve our commercial or business objectives and to comply with our regulatory obligations. After careful consideration, Fasanara Capital has concluded the processing of personal data for the reasons mentioned below shall be considered necessary, as there would not be another way of achieving the identified interest of the firm.

Fasanara Capital will always ensure its business interest does not override your rights and freedoms as an individual. We may also retain your information to comply with any applicable laws or regulations. We are legally required to hold some types of information to fulfil our statutory and regulatory obligations. These obligations include regulations made by the Financial Conduct Authority ("FCA"), by whom we are authorised and regulated by in the UK (reference number: 551020 for Fasanara Capital Ltd).

We may, for example, use your information to: respond to queries from you or provide information that you request from us; ensure that content from our Site is presented in the most effective manner for you and for your computer; provide you with information about our products and services; send you promotional materials, newsletters and other communications; provide you with invitations to events, promotions, surveys and market research or other marketing correspondence; respond to your inquiries; verify your information; perform data analysis (such as demographic analysis and consumer research); operate, evaluate and improve our business (developing our products and services, improving our communications, performing auditing or accounting functions); protect against any unlawful activity and prevent fraud; carry out our obligations arising from any contracts entered into between you and us; comply with any legal requirements and our Policies; allow you to participate in interactive features of our service when you choose to do so; notify you about changes to our business, products or services; or any other internal purposes that we believe to be necessary.

As a principle, we will only retain your personal data for such period of time as is necessary to serve our business interest and will not process personal data beyond that point. If you ask for your personal data to be removed, we may still keep it in our records for 5 years to comply with FCA requirements and will proceed to delete it afterwards provided there is no other reason which makes it necessary for us to keep the personal data (e.g. an investigation or pending Court case). You would not be contacted or receive any marketing materials during such period.

Internet browsing, cookies, and Google Analytics

The types of personal data that may be collected through our Site include: IP address, name, address, email address and telephone number. Additionally, if you are accessing parts of this Site that are password protected, then once you submit your password and enter, this Site will recognise who you are and collect all information that you submit, including all electronic information (such as what you read or watch).

We will collect cookies in compliance with the PECR and the GDPR. We will collect cookies for compliance reasons; and may collect further cookies to enhance your Site and customer experience. You can always change your approach at any time.

How we store, transfer and process personal data

All information you provide to us is stored on secure servers. Information may be transferred, stored and processed by third parties (see below).

Use of third parties

Communicating via the internet and sending information to you by other means necessarily involves your personal information passing through or being handled by third parties, but we do not sell or distribute without your permission your personal information to third parties for purposes of allowing them to market products and services to you.

We have also reviewed all key third party agreements where EU personal data is being processed to ensure they are GDPR compliant and that your rights described herein are being protected.

What safeguards we have in place

Fasanara Capital has security measures in place to protect the loss, misuse and alteration of the information under our control. As no data transmission over the internet can be guaranteed as 100% secure, we cannot ensure or warrant the security of any information you transmit to us and you transfer the data at your own risk. We endeavour to use appropriate security measures, including systems security, backups, business recovery and breach notification procedures, monitoring and testing procedures.

Although we will do our best to protect your personal data, we cannot guarantee the security of your personal data transmitted to our Site and accordingly any transmission is at your own risk. However, once we have received your information, we will use all appropriate procedures and security measures to try to prevent unauthorised access to or disclosure of your personal data.

What rights you have with regards to your personal data we process

You have the right to access your personal data and request a copy of the information held by us about you. You also have the right to ask for your information to be transferred to another organisation or to yourself. Where such requests are manifestly unfounded or excessive, we will inform you and we may charge a reasonable fee or refuse to respond to such a request.

You have the right to ask us not to process your personal data for marketing purposes. We will inform you if we intend to use your personal data for such purposes. You can exercise your right to prevent such processing by contacting us directly. You can also exercise the right and change your marketing preferences or restrict any specific uses of your personal data at any time by contacting us.

The accuracy of your information is important to us. We review information we hold to ensure it is up to date and accurate. You have the right to correct any inaccuracies in the details we hold about you – if you change your email address or notice any other information we hold is inaccurate or out of date, please contact us. You have the right to obtain without undue delay the rectification of any inaccurate personal data concerning you.

Your rights to access, rectify, erase or restrict your personal data stated above will be processed by Fasanara Capital usually within 30 days of receiving your request. However, Fasanara Capital may notify you within such timeframe of an increased time period to process your request and its reason. Where Fasanara Capital believes the request is unreasonable it shall notify you and refuse to process your request. Our Site may, from time to time, contain links to and from the websites of third parties. If you follow a link to any of these websites, please note that these websites may have their own privacy policies and that we do not accept any responsibility or liability for these policies or the treatment of your personal data by any third parties. Please check these policies before you submit any personal data to these websites.

Complaints

If you believe your personal data has been processed by Fasanara Capital in a way that does not comply with the GDPR, you have the right to lodge a complaint with us directly or with a supervisory authority. If you believe Fasanara Capital did not take action on a request you have sent; or informed you without delay and at the latest within one month of receipt of the request of the reasons for not taking action and on the possibility of lodging a complaint with a supervisory authority and seeking a judicial remedy, you have the right to lodge a complaint with a supervisory authority.

Governing law and jurisdiction

This legal notice and all issues regarding our Site are governed by English law and are exclusively subject to the English courts.

40 New Bond Street
London W1S 2RX
www.fasanara.com



Contact information

If you have any questions regarding this Privacy Policy and our privacy practices you can contact us via email at investor.relations@fasanara.com or in writing to Compliance, Fasanara Capital Ltd, 40 New Bond Street, London, W1S 2RX.

London, 3rd May 2018