

Triple Point Group Privacy Policy

About Triple Point

Triple Point Investment Management LLP (“TPIM”) is part of the Triple Point Group (“TPG”). It is a regulated financial services business with Financial Conduct Authority (“FCA”) number 456597. It is registered in England and Wales with number OC321250, and is registered with the Information Commissioner’s Office (“ICO”), number Z1021055.

Triple Point Administration LLP (“TPAL”) is a regulated business with FCA number 456597. It is registered in England and Wales with number OC391352, and is registered with the ICO, number ZA049704.

Advancr Ltd is an Appointed Representative of Triple Point Investment Management which is authorised and regulated by the FCA. Advancr Ltd, company number 07586478, is registered with the ICO, number ZA171970.

All of the above are part of the Triple Point Group, and are all based at Triple Point’s head office at 18 St. Swithin’s Lane, London, EC4N 8AD.

Please take the time to read this Privacy Policy, which forms part of our standard Terms and Conditions, for all products and services across the Group, including those branded Triple Point Advancr.

If you have any further questions about our Privacy Policy, or our use of your personal information, you can contact us at:

Data Officer
Triple Point Group
18 St Swithin’s Lane
London
EC4N 8AD

Telephone: 020 7201 8990
email: contact@triplepoint.co.uk

What is the purpose of our policy?

This Privacy Policy sets out how we collect and use your personal information. We recognise the importance of maintaining the privacy and security of peoples’ personal information, and are committed to doing so responsibly.

‘Personal Information’ is defined as any detail about you that can be used either on its own, or with other data, to personally identify you.

Personal information that we collect

Personal information may be given to us directly by you, or by individuals or companies that have been authorised by you to act on your behalf to share such information with us, for example, if you use an Independent Financial Advisor. Alternatively, we may receive or collect information for other sources, such as data created when you visit our websites, or information received back when we request identity checks for anti-money laundering purposes, in order to comply with our regulatory obligations.

Personal data that we may hold include:

- Your title, name, nationality, and date of birth.
- Your contact details, such as email addresses, physical addresses and telephone numbers.
- Information about your financial position, investor certification status, and other information required when you invest with us.
- Identification information as required by law, such as copies of passports, utility bills, driving licenses, and other identification evidence, used and stored for anti-money laundering and anti-fraud purposes.
- Records of correspondence between you and us, including letters, emails and phone calls.
- Information collected from our websites, including both information that you provide by filling in forms on our websites, and website usage information, login details and similar, used to help us to monitor traffic and optimise the user experience. More information is provided below about [Cookies](#).
- Records of any survey results that you may have completed for research purposes.

Updating your Personal Details

If any of your personal details change, please notify as soon as possible. You can do so in some cases by logging into your online account and updating details there directly, e.g. with Advancr Bonds accounts. Alternatively you can email CustomerServices@advancr.com or InvestorRelations@triplepoint.co.uk to advise us of any changes. In some cases, including for example a change of name, further supporting information may be required to enable us to comply with regulations before we can actually effect the changes.

How we use personal information

We use personal information for the following purposes:

- to maintain our records and keep them up to date;
- to respond to questions that are submitted to us;
- to provide the services, effect the transactions, and manage the investments that we have been commissioned to provide and to communicate with you about these, including providing statements and notices;
- to identify and prevent illegal activity including money laundering and fraud;
- to carry out any checks that are required by applicable laws and regulations;
- to ensure that content on our websites is presented in the most effective and convenient manner for you and for your computer or mobile devices, and to monitor usage and interest in different areas of our websites;
- to carry out general statistical analysis;
- to assess creditworthiness in accordance with our Terms and Conditions;
- to carry out our obligations, and exercise our rights, in relation to legal agreements that you are party to; and
- internal administrative purposes.

The legal basis for our use of your information

We need a lawful basis to collect and use your personal data under data protection law. The law allows for six ways to process personal data (and additional ways for sensitive personal data). Four of these are relevant to the types of processing that Triple Point carries out. This includes information that is processed on the basis of:

- (a) A person's consent (for example to send you direct marketing by e-mail);
- (b) Processing necessary for the performance of a contract with you;
- (c) Processing that is necessary for compliance with a legal obligation (for example, to comply with our reporting obligations to the Financial Conduct Authority)
- (d) Our legitimate interests (please see below for more information).

Personal information may be legally collected and used if it is necessary for a legitimate interest of the organisation using the data, as long as that interest is not overridden by the privacy rights of the individual whose data is being used. Triple Point's legitimate interests include responding to solicited enquires, providing information, research, fraud prevention, credit checks, statistical analysis and employment and recruitment requirements.

If you would like to change our use of your personal data in this manner, please get in touch with us using the details in the "How to contact us" section below.

Who else may have access to your information

Your data may be accessed by different parts of, or companies within, the Triple Point Group.

We may disclose your information to third parties:

- if you request us to do so, or give us permission to do so;
- if we are required to disclose or share your personal data in order to comply with any legal or regulatory obligations;
- if necessary to do so for us to apply or enforce any agreements to which you are a party;
- to protect our rights and property, or to ensure our safety, or that of our customers or others parties;
- to check your identity and/or to prevent fraud and/or to legitimately assess credit risks (where your data is used for credit checks, the credit database will keep a record of the request and may use it if other applications are made in your name);
- to subcontractors and agents, for the purposes of legitimately operating our websites, including the Advantr website, in which case we will confirm that such subcontractors also apply responsible data protection and privacy policies;
- for audit purposes and to meet obligations to legitimate regulatory or tax authorities;
- if we sell, or acquire, other businesses which necessitate the sharing of personal data, in which case we will confirm that counterparties also apply responsible data protection and privacy policies.

If we share your information with third parties, we will ensure they are obliged to process your information in compliance with applicable data protection legislation, and we will only provide them with the information they need for the purposes set out above

Storing personal information

We are committed to ensuring the responsible handling and security of personal details held.

Once we have received personal data, we use a variety of manual and automated procedures to ensure it is secure and to try to prevent unauthorised access, unlawful processing, accidental loss, destruction, or damage of data.

In this regard we remind and urge you adopt responsible best practices for your passwords, and your own data security more generally. We have set out certain requirements in this regard in our Terms and Conditions.

We also remind you that the transmission of information over the internet, is not secure and, whilst we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted electronically to us; such transmission is at your own risk. Email technology has unfortunately evolved without native encryption – sending an email is often compared with sending a postcard through conventional mail - therefore please do not email personal information or security details that you would be concerned about were it to be intercepted, and please re-confirm important information like bank account details by telephone, as a precaution against interception.

Retention of your personal information

We will keep your personal information for no longer than is necessary for the purposes for which it is processed, in accordance with our internal policies.

The length of time that data will be kept may depend on the reasons for which we are processing the data and on the law or regulations that the information falls under such as financial regulations, statutory limitation periods, financial services regulation etc., or any contractual obligation we might have.

For example, the Financial Conduct Authority requires us to retain records about your identification for a period of 5 years after our relationship with you has ended, and statutory limitation periods for any potential disputes can last up to 12 years.

Once the retention period has expired, the information will be confidentially disposed, permanently deleted, or in some cases archived.

Your rights

Aside from our own policies and approaches to data, you have various rights by law. These include the rights to:

- Right of access

You have the right know what information we hold about you and to ask, in writing, to see your records.

We will supply any information you ask for that we hold about you as soon as possible, but this may take up to 30 days. We will not charge you for this. You will be asked for proof of identity as the person

dealing with your request may not be the staff member you have met before. We need to be sure we are only releasing your personal data to you.

This is called a data subject access and can be done by writing to us using the “How to contact us” details.

- Right to be informed

You have the right to be informed how your personal data will be used. This policy as well as any additional information or notice that is provided to you either at the time you provided your details, or otherwise, is intended to provide you with this information.

- Right to withdraw consent

Where we process your data on the basis of your consent (for example, to send you marketing e-mails) you can withdraw that consent at any time. To do this, or to discuss this right further with us, please contact us using the details in the “How to contact us” section below.

- Right to object

You also have a right to object to us processing data where we are relying on it being within our legitimate interests to do so (for example, to send you direct marketing to your business email). To do this, or to discuss this right further with us, please contact us using the details in the “How to contact us” section below.

- Right to restrict processing

In certain situations you have the right to ask for processing of your personal data to be restricted because there is some disagreement about its accuracy or legitimate usage.

- Right of erasure

In some cases, you have the right to be forgotten (i.e. to have your personal data deleted from our database). Where you have requested that we do not send you marketing materials we will need to keep some limited information in order to ensure that you are not contacted in the future.

- Right of rectification

If you believe our records are inaccurate you have the right to ask for those records concerning you to be updated. To update your records please get in touch with us using the details in the “How to contact us” section below.

- Right to data portability

Where we are processing your personal data because you have given us your consent to do so, you have the right to request that the data is transferred from one service provider to another.

You can exercise these rights at any time by contacting us using the contact details below.

Our website may contain links to other Internet sites, content, or videos (embedded or direct links) that are maintained by third parties. If you follow a link to any of these websites, please note that those third

parties will have their own privacy policies which will apply at that point. Please check those policies before you submit any personal data to these websites.

Contact

If you have any concerns or further questions about our Privacy Policy please get in touch. You can write to us at:

Data Officer
Triple Point Group
18 St Swithin's Lane
London
EC4N 8AD

Or you can email us at: Contact@triplepoint.co.uk or telephone us on: 020 7201 8990. For Advancr please email: CustomerServices@advancr.com or telephone: 020 3198 6983.

Finally, we do welcome and value all feedback, both positive and negative, and if you have any feedback for us please use these contact details.

You also have the right to make a complaint directly to the relevant supervisory authority, including for data related issues, to the Information Commissioner's Office (ICO). You can find details about how to do this on the ICO website at: www.ico.org.uk/concerns/ or by calling their helpline on 0303 123 1113

Website cookies

What are cookies?

Cookies are data files containing small amounts of information which are downloaded to the device or browser you use when you visit a website. Cookies are then sent back to the originating website on each subsequent visit, or to another website which recognises that cookie.

How do we use cookies?

We use cookies in order to ensure our Website functions correctly and to improve our understanding of how you use the Website in order to make improvements.

We can also collect information about Website usage from data contained in "log files" from third parties. Log files are not cookies; they do not contain any personal data; and they are not used to identify your personal use of the Website. When you request any web page from the Website, web servers automatically obtain your domain name and IP address, but they reveal nothing personal about you and that data is only used to examine Website traffic in aggregate, to investigate abuse of the Website and its users, and/or to cooperate with law enforcement. Such data is not disseminated to third parties, except in aggregate.

What cookies do we use?

	Cookie Type			
Where does the cookie originate?	Necessary	Analytical/ Performance	Functional	Targeting
google-analytics.com	Yes	Yes	n/a	Yes
Salesforce.com	Yes	Yes	Yes	Yes
wordpress_test_cookie	Yes	Yes	Test for cookies	Logged in users

How do I manage my cookie settings?

All browsers provide tools that allow you to control how you handle cookies: accept, reject or delete them. These settings are normally accessed via the 'settings', 'preferences' or 'options' menu of the browser you are using, but you could look for a 'help' function or contact the browser provider. If you are unsure as to how to manage your cookies, please see the following links to view instructions for the most commonly used web browsers:

- [Firefox internet settings](#)
- [Chrome cookie settings](#)
- [Opera cookie settings](#)
- [Safari cookie settings](#)
- [Internet Explorer cookie settings](#)

You may also use tools provided by the third parties mentioned in the table above to prevent their Targeting cookies being set.

Configuring your computer and/or mobile browser to reject 'necessary', 'analytical/performance' or 'functional' cookies may severely impact your experience on the Website and some parts of the Website will not function at all.

The website: www.allaboutcookies.org/manage-cookies provides useful information about how to change your browser's settings should you wish to block or delete cookies.