

Tellon Capital Group GDPR Privacy Notice

Who we are

Tellon Capital ("Tellon ") is the Controller of the personal information you provide to us and Edward Moore is your contact if you have any questions about this Privacy Notice or the information we hold about you .

Email address: edwardm@telloncapital.com

Contact telephone number: +44 (0)20 7580 5725

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues. We would however appreciate the chance to deal with your concerns before you approach the ICO, so please contact us in the first instance.

What types of information do we use?

We collect information in the course of working with you in any of the following capacities:

- Providing our investment advisory or fund management services to you;
- Co-investing with you;
- Serving as a transaction counterparty in the acquisition , disposal or letting of real estate assets;
- In the receipt of services from you;
- In considering commencing a prospective business relationship with you; and
- In fulfilling our anti money laundering obligations.

The information which we collect, use and store about you may include :

- Contact information including email and personal and professional postal addresses;
- Bank details;
- Information on your trading or other financial activity;
- Financial information (financial position and history);
- Documentary data (things can include passport or drivers licence or other forms of identification);
- Public records (or openly accessible data) such as the Electoral Register;
- Historical information i.e. previous names and addresses;

Consequences of not providing some types of information

Where we need to collect your personal information by law, or under the terms of a contract we have with you, and you fail to provide that information when requested, we may not be able to provide the goods or services you asked for. In this case we may have to cancel the product or services but we will tell you if this is the case.

How we will use your personal information

We only obtain, use and keep personal information where we need it for a specific purpose. We set out in the table below the ways in which we plan to use your personal information. We are only able to use your personal information if we have a proper legal reason or basis for doing so.

We set out in the table below all the ways we plan to use your personal information and the legal bases we rely on to do so. We also explain what our legitimate interests are where appropriate:

Purpose	Lawful basis for processing including our legitimate interests
To on-board you as a new investor to a fund operated by us , to on board you as a co-investor with us , to conclude a legal contract for the supply of goods or services by you or in order to receive investment advice from us .	To fulfil our contract with you To fulfil our legal obligations to prevent financial crime
To manage your account	Necessary for our legitimate interests – to make distributions to you and collect capital contributions from you
To monitor your investment on an on-going basis	To fulfil our contract with you
To meet our regulatory obligations to provide you with regular information about your investment	To fulfil our regulatory and contractual obligations
To contact you about other products and services we think you may be interested in	Necessary for our legitimate interests – to develop our products and services and grow our business.
To meet our payment obligations to you as our supplier	To fulfil our contract with you

Marketing

We will always seek your consent to use your personal information for this purpose. We will very clearly explain why we are seeking your consent and ensure that you are provided with a simple method of providing this – usually via a tick box on our emails and/or a tick box in our client agreement/terms of business.

You are free to change your mind at any time by ticking the box to withdraw consent on our email or by specifically emailing us with reference to our agreement,

Who we share your information with

- We may need to provide information to third parties for a variety of reasons, for example, we may need to provide information to assist in the detection or prevention of crime or for the purpose of safeguarding national security. Please refer to the table in the section ‘How we will use your personal information’ which explains how we use your data. In the case of our investors, co-investors and for all information collected as part of our anti money laundering controls , this information is shared with our company administrators in Jersey.

Sending your information outside of the EEA

The regulations which have been put in place to protect your privacy apply throughout the EEA which means that any country within the EEA must meet the same privacy standards as the United Kingdom. We transfer certain data to Jersey ,which has been deemed to have an adequate data protection regime to the EEA, by the European Commission .

Storing your information

In our relationship with you, we will typically have a contract with you and will need to keep your personal information (updated to ensure accuracy) to fulfil our contract. We also need to comply with EU and UK law, which often requires us to keep certain records - which will include certain personal information – for several years. Please note that we will destroy your personal information as soon as we no longer have a legal entitlement for holding it.

Your rights

You are provided with a number of different rights under the data protection laws in relation to your personal information. These allow you:

- To access your information;
- To request we correct your information;
- To request that we erase your information;
- To object to the processing of your information;
- To request a restriction in the processing of your information;
- To request a transfer of your information; and
- To withdraw your consent.

If you wish to exercise any of these rights please email Edward Moore at the email address above. Please note that you will not have to pay a fee to access your personal information or to exercise any of the other rights. We may, however, charge a reasonable fee if your request is clearly unfounded, repetitive or excessive or we may refuse to deal with your request. We may also need to seek further information from you to confirm your identity before we release any personal information. This does not affect your right to make a complaint.