

## Introduction

Your privacy is very important to us. This notice (“Privacy Notice”) is provided by Forada Limited (“we” or “us”) and sets out our policies with respect to the collection, sharing and use of personal data.

Forada Limited is incorporated in England and Wales and its registered office is at 130 Wood Street, London, United Kingdom, EC2V 6DL. Forada Limited is an appointed representative of Mirabella Advisors LLP, which is authorised and regulated by the Financial Conduct Authority of the United Kingdom.

## About this Privacy Notice

We are a data controller in respect of your personal data for the purposes of data protection law, such as the European Union’s General Data Protection Regulation and such regulation as it forms part of the domestic law of the United Kingdom, where it is supplemented by the Data Protection Act 2018. We are responsible for ensuring that we use your personal data in compliance with data protection law.

This privacy notice applies to you if (i) you are a client or prospective client of Forada Limited (including an investor or prospective investor in a vehicle or entity that we manage or advise (“Forada Funds”)), a service provider to us or to an Forada Fund, (ii) your personal data has been provided to us in connection with any of the foregoing by another person (such as where you are a director, partner, trustee, employee, agent or direct or indirect owner of such person); or (iii) you otherwise enter into communications with us by email or other means.

This privacy notice sets out the basis on which personal data about you that you provide to us, that we create about you or that we obtain about you from other sources, will be processed by us. Please take the time to read and understand this privacy notice.

## How we collect personal data about you

We may collect personal data about you through:

- information provided directly to us by you, or another person on your behalf, through our website, by email or post, or in person;
- information that we obtain in relation to any transactions between you and us;
- recording and monitoring of telephone conversations and electronic communications with you as described below; or
- the use of Internet “cookies” (an information collecting device from a web server), as described further below.

We may also, in some circumstances, receive personal data about you from third parties, such as service providers or trading counterparties, regulatory or law enforcement agencies, credit reference agencies and agencies conducting background checks. Personal data may also be obtained from publicly accessible sources of information, such as public databases, industry associations, social media and online professional networks.

## Why we collect personal data about you

We may collect and use your personal data for the purposes of administering the relationship between us, marketing our products and services to you or the businesses with which you are associated, monitoring and analysing our activities, and complying with applicable legal or regulatory requirements. We will use one of the permitted grounds under the applicable law to process your personal data. Such grounds include instances where you have given your consent and cases where your consent is not required under applicable law, such as where processing is required to comply with a legal obligation, or where we or a third party determine that the processing is necessary for our legitimate business interests. The legitimate interests to process your personal data may include any of the purposes identified above and any other purpose where we or a third party have determined that you have a reasonable expectation for us or a third party to collect or use your personal data for such purpose. You have the right to object to the use of your personal data for direct marketing purposes.

### The types of personal data we may collect and use

The categories of personal data we may collect will depend on the nature of our relationship with you and the purpose of which personal data is being collected. Such personal data may include names, residential addresses or other contact details, signature, nationality, date and place of birth, national insurance or other tax identification number, photographs, copies of identification documents, bank account details, information about assets or net worth, credit history, criminal and administrative offences, source of funds details, as well as special categories of data, such as biometric or genetic data, information about a person's ethnic origin, religious beliefs, health, or other sensitive information.

### Use of automated decision-making processes

We do not use automated decision making.

### Sharing your personal data with third parties

We may (to the extent relevant to the purpose for which we collect your personal data), share your personal data with third parties, such as:

- our affiliates or other entities that are part of our group or with our clients.
- any person to whom we have a right or obligation to disclose personal data, or where we determine that disclosure is necessary to protect or defend our rights or property,
- including with regulators, courts of law, governmental, regulatory or law enforcement agencies,
- our internet, IT, telecommunications and other service providers, including legal advisers, accountants, payroll administrators, insurance and employee benefits providers and administrators.
- service providers and trading counterparties to our clients, including placement agents or distributors, brokers, banks, trading venues, clearing houses, custodians, corporate.
- services providers, administrators of our funds, and providers of customer relationship management tools.
- credit reference agencies and other third parties conducting background checks in the context of employment or client, counterparty, or investment due diligence.
- any person, as directed by you; or
- any person to whom we transfer any of our rights or obligations under any agreement, or in connection with a sale, merger or consolidation of our business or other transfer of our assets, whether voluntarily or by operation of law, or who is otherwise deemed to be our successor or transferee.

### Transfers of personal data to countries outside of the European Economic Area (EEA) and the United Kingdom

Due to the international nature of our business, your personal data may be transferred to countries outside of the EEA and the United Kingdom, such as to jurisdictions where we or our clients conduct business or have a service provider, including countries that may not have the same level of data protection as that afforded by the EU General Data Protection Regulation, such regulation as it forms part of the domestic law of the United Kingdom (where it is supplemented by the Data Protection Act 2018 and other data protection rules applicable to us (collectively, "Data Protection Law"). In these circumstances, we take steps to ensure that the recipient agrees to keep your personal data confidential and that it is held securely in accordance with the requirements of Data Protection Law, such as by requesting appropriate contractual undertakings in our legal agreements with service providers.

### For how long do we keep your personal data?

We will generally keep personal information about you for as long as necessary in relation to the purpose for which it was collected, or for such longer period if required under applicable law or necessary for the purposes of our other legitimate interests. The applicable retention period will depend on various factors, such as any legal obligation to which we or our service providers are subject as well as on whether you decide to exercise your right to request the deletion of your data from our systems. As a minimum, data about you will be retained for the entire duration of any business relationship we may have with you, and for a minimum period of five years after the termination of any such relationship. We will, from time to time, review the purpose for which

we have collected data about you and decide whether to retain it, update it, or securely delete it, if the data is no longer required.

### What are your rights?

You have certain rights under Data Protection Law in respect of the personal data we hold about you and which you may exercise. These rights include:

- to obtain information regarding the processing of your personal data and to request access to your personal data.
- to request rectification of inaccurate or incomplete personal data.
- to request erasure of your information (a “right to be forgotten”). Please note that there may be circumstances where you ask us to erase your personal data but we are legally entitled to retain it.
- to restrict the processing of your personal data in certain circumstances. There may be circumstances where you ask us to restrict, our processing of your personal data but we are legally entitled to continue processing your personal data or to refuse that request.
- to object to our use of your personal data, such as where we have considered such use to be necessary for our legitimate interests (e.g. in the case of direct marketing activities). Again, there may be circumstances where you object to our processing of your personal data but we are legally entitled to continue processing your personal data or to refuse that request.
- where relevant, to request the portability of your personal data.
- where you have given consent to the processing of your personal data, to withdraw your consent; and
- to lodge a complaint with the a competent data protection regulator if you think that any of your rights have been infringed by us.

You can exercise your rights by contacting us using the details set out under “How to contact us” below. You can find out more information about your rights under United Kingdom or European Union data protection law by contacting the UK’s Information Commissioner’s Office or an EU data regulator such as the Irish Data Protection Commissioner, or by searching their websites at [ico.org.uk](http://ico.org.uk) or [www.dataprotection.ie](http://www.dataprotection.ie), respectively.

### How to contact us

If you have any questions about this Privacy Notice or requests with regards to the personal data we hold about you, you may contact the Chief Operating Officer by email at [info@forada.com](mailto:info@forada.com) or by writing to us at 20 North Audley Street, London W1K 6LX.

### Use of cookies

We may send text files (e.g., “cookies” or other cached files) or images to your web browser to store information on your computer. Such text files and images are used for technical convenience to store information on your computer. For instance, we may use a session cookie to store form information that you have entered so that you do not have to enter such information again. We may use information stored in such text files and images to customise your experience on this website and to monitor use of this website. You may set your browser to notify you when you receive a cookie. Many web browsers also allow you to block cookies. If you block cookies you may not be able to access certain parts of this website. You can disable cookies from your computer system by following the instructions on your browser or at [www.allaboutcookies.org](http://www.allaboutcookies.org).

### Recording and monitoring of communications

We may record and monitor telephone conversations and electronic communications with you for the purposes of:

- ascertaining the details of instructions given, the terms on which any transaction was executed or any other relevant circumstances.
- ensuring compliance with our regulatory obligations, or
- detecting and preventing the commission of financial crime.

Copies of recordings will be stored for a period of five years, or such other longer period as we may determine from time to time or may be required by applicable law.