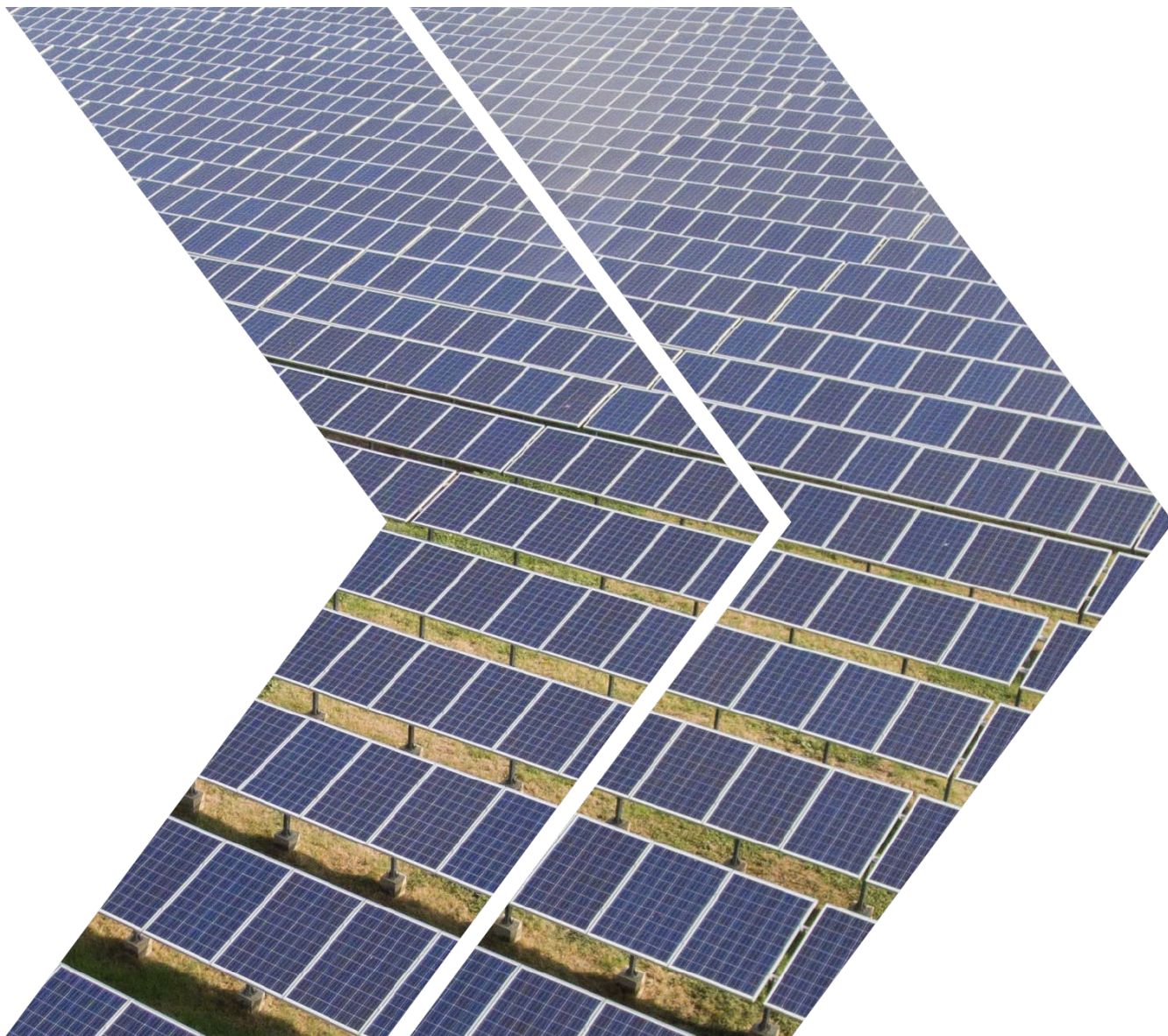


Privacy Notice

September 2026



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British International Investment respects your privacy. This privacy notice (**the notice**) is designed to give you information about how your personal data is collected and used, when it is processed by or on behalf of British International Investment plc, its affiliated companies and subsidiaries (hereinafter together referred to as **BII**). This notice also tells you about how your personal data is protected and about your privacy rights.

The scope of this notice also includes all the websites, applications, mobile sites, and social media platforms that are owned by BII, where personal data is processed. If you choose not to provide us with your personal information, in most cases, we will not be able to provide you with our services or information about them.

BII may amend this notice at any point in time. Please check this notice periodically at www.bii.co.uk to inform yourself of any changes.

1. The types of information we collect

When you interact with us, or our website we may collect use, store and transfer different kinds of personal data about you. Generally speaking, we will collect the following categories of information relating to you and/or your use of our services (see paragraphs 1.1 to 1.13 for additional information).

- a) identity and contact information** – such as name, email address, telephone number, identification/KYC documents;
- b) events data** – this may include information necessary to coordinate your booking or attendance, or photos or recordings taken at our events;
- c) website usage** – if you use our website we will typically collect certain technical data including your internet protocol (IP) address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other details about the devices you use to access this website;
- d) marketing and communications preferences** - if you have consented to us sending you marketing communications about our services;
- e) communications with you** – if you contact us, we will typically keep a record of that correspondence;
- f) information relating to investments** – such as information contained in or relating to your proposal and supporting documents;
- g) information related to The Index** – information used to build your profile such as identity and contact information about your company and employees, and references from your former clients.

2. The legal bases we rely upon to process your personal data

This section explains the purposes for which we use the personal data we collect about you and the legal bases we rely on under applicable data protection law.

The “legal bases” are set out in data protection laws: they allow data controllers to process personal data only when the processing is permitted by the specific “legal basis” set out in law. These grounds include:

- **Consent:** where you have consented to our use of your information.
- **Contract performance:** where your information is necessary to enter into or perform our contract with you (or to take steps at your request before entering into such a contract).
- **Legal obligation:** where we need to use your information to comply with our legal and regulatory obligations.
- **Legitimate interests:** where we use your information to achieve a legitimate interest and our reasons for using it outweigh any prejudice to your data protection rights.
- **Legal claims:** where your information is necessary for us to defend, prosecute or make a claim against you, us or a third party.

We have identified the legal basis that applies to each processing activity described in section 3. In many cases, we rely on legitimate interests to manage our relationship with you and to operate, improve and protect our business, provided those interests are not overridden by your rights and interests. In other cases, we rely on contract, legal obligation, consent or legal claims, depending on the nature of the processing.

- it is necessary to enter into or perform a contract with you;
- we are subject to a legal obligation to do so; or
- we are required to collect your consent for a processing activity.

Where we rely on your consent (for example, where this is required for certain cookies, marketing communications or special category personal data), you may withdraw that consent at any time. This will not affect the lawfulness of any processing carried out before you withdrew your consent. Please contact us if you wish to withdraw consent.

3. How we collect and use information

3.1. Visitors to our websites

When you visit our website, we collect certain technical information, including your IP address, cookies and information about how you use the site. We use analytics tools, including Google Analytics, to collect standard internet log information and information about visitor behaviour patterns. We do this to understand how our website is used and to help improve it. We do not use this information to identify individual visitors.

BII does not make any attempt to discover the identities of visitors to our website.

For more information about our use of cookies, including how to manage or refuse them, please see our [Cookies Policy](#).

Legal basis: your consent (for the use of cookies) and our legitimate interests (to allow us to improve our services)

3.1.1. Newsletters

We will collect your name and email address if you choose to subscribe to our newsletter. We use a third party email marketing service to deliver our monthly e-newsletters. We gather statistics around email opening and clicks using industry standard technologies including clear gifs to help us monitor and improve our e-newsletter.

Legal basis: your consent

3.1.2. General enquiries

When you submit an enquiry by email, telephone or post, we collect the contact details and information you provide to us in connection with that enquiry. We use this information to respond to you, manage any follow-up and, where appropriate, monitor and improve the quality of our services.

Legal basis: our legitimate interests (to respond to enquiries, manage follow-up and improve our services) and, where relevant, contract performance

3.1.3. Events

If you register for one of our events, we use the information you provide to manage your booking, communicate with you about the event and, where relevant, administer attendance and post-event feedback. Depending on the event, this may include using a third-party event management platform on our behalf.

Legal basis: legitimate interests in managing and evaluating our events

3.1.4. Investment proposals

When you submit an investment proposal, we will collect your first name, surname, email address, comments and any attached documents you choose to provide us with. We will only use the information supplied to us to review the proposal, interact with the submitter throughout the review process, and to provide a final response.

Legal basis: contract performance

3.1.5. Screening

We may use personal data relating to prospective or current investees and relevant associated individuals (such as directors, officers, beneficial owners and other connected persons) for screening and due diligence purposes, including daily screening against sanctions, watchlists, adverse media and other compliance databases, to assess and monitor legal, regulatory and reputational risk.

Legal basis: legal obligation

3.2. People who participate in our surveys

We may contact you to participate in optional surveys from time to time. We will only do this if we have your consent or another lawful basis to do so. We use a third-party online survey provider to deliver, manage and produce reports relating to the survey. We may collect names, contact details and other information relevant to the survey. We will be transparent when we collect personal data through our surveys, will explain the purposes for which we are collecting it and will only collect the minimum amount of information required for the purposes of the particular survey

Legal basis: your consent and our legitimate interests (to allow us to improve our services)

3.3. People who call our contact points

When you call BII, we collect Calling Line Identification (CLI) information which may include your telephone number. We use this information to help improve our efficiency and effectiveness. We do not record phone conversations.

Legal basis: our legitimate interests (to allow us to improve our services)

3.4. People who email us

When you email us, we may collect your email address, IP address and any other personal data contained in your message, attachments or related metadata. We use this information to manage and respond to your enquiry, request or correspondence. It may also be processed through our email, email security and ticketing systems for security, continuity and administrative purposes.

We use Transport Layer Security (TLS) to encrypt and protect email traffic in line with security best practices. If your email service does not support TLS, you should be aware that any emails we send or receive may not be protected in transit.

We will also monitor any emails sent to us, including file attachments, for viruses or malicious software. Please be aware that you have a responsibility to ensure that any email you send is within the bounds of the law.

Legal basis: our legitimate interests (to manage correspondence, maintain security and administer our systems) and, where relevant, contract performance

3.5. People who make a complaint to us

When we receive a complaint, we create a record containing the details of the complaint and the individuals involved. This will usually include the complainant's identity and contact details, together with any other personal data needed to investigate and respond to the complaint.

We use this information to investigate, manage and resolve the complaint, to communicate with the parties involved and, where appropriate, to monitor and improve the quality of our services and complaint handling processes.

Where necessary to investigate and respond to a complaint fairly, we may need to disclose information about the complaint, including the identity of the complainant, to the person or organisation the complaint relates to.

If a complainant asks us not to disclose information that identifies them, we will consider that request carefully. However, it may not always be possible to investigate or resolve a complaint on an anonymous basis.

We will keep personal information contained in complaint files in line with our record and retention policy. It will be retained in a secure environment and access to it will be restricted according to the 'need to know' principle.

Legal basis: complying with our legal obligations and our legitimate interests (to allow us to improve our services)

3.6. Identity data and verification of identity

In some instances, we will need to verify your identity (e.g. access requests, know your customer (KYC), for other screening purposes, visiting our premises). We will always be transparent and explain the purposes for collecting identity data from you prior to processing.

Identity data can include: IDs assigned by us, passport, driving license, or a copy of ID (passport, driver's licence or comparable identity document), utility bills.

This data will only be used for verification of identity relating to the purposes it was requested for. When visiting our premises, we may be required to share your data with our building manager for the purpose of granting access.

Legal basis: contract performance and complying with our legal obligations

3.7. Use of personal data for electronic direct communication purposes in relation to:

(a) Stakeholder communications

We will only use your personal data to send out stakeholder communications via electronic means (e.g. email, SMS or MMS) if we have obtained your prior consent or have another lawful basis to do so. You can withdraw your consent or object to stakeholder communications at any point in time, by following the unsubscribe instructions included in the communications or by contacting the DPO at dataprotection@bii.co.uk.

Legal basis: your consent or our legitimate interests (to contact you about our updates within our business)

(b) Our relationship with you

We will use your personal data to send you service communications via electronic means (e.g. email, SMS or MMS) that are necessary for us to fulfil our contract with you and provide you with our services. If you object to receiving these service communications, it may prevent us from providing our services to you.

Legal basis: contract performance

3.8. Photos and videos at BII events

At special events organised by BII we may take photos and videos of you. This includes image

recordings such as films, photographs, video recordings, digital photos. We will provide notice to you of this fact at each BII event and provide you with the opportunity both prior to the event to object to any photos and videos taken by us and after the event to not be featured in any of BII's online content, social media, films, marketing and/or press releases. If you do not wish to be photographed or filmed at any BII event, please notify us prior to the event by emailing communications@bii.co.uk.

Legal basis: your consent

3.9. Personal data we receive from third parties

We may obtain personal data about you from third parties, other British International Investment companies, carefully selected business partners who provide services on behalf of us, and any other third party who may lawfully pass to us information about you.

3.10. People who are appointed to boards as BII's nominees or who act as advisors

Where you are approached or apply to act on a board or as an advisor for BII, we will require certain information to verify your identity and qualification to hold such office. The information that you provide will be shared with the relevant company to which you will be appointed in advance of and in connection with your appointment.

We may also collect information to assess your suitability, eligibility and ongoing appointment, and to comply with governance, legal and regulatory requirements. Where relevant, this information may be shared with the relevant company or entity in connection with your proposed or actual appointment.

The information that you provide may comprise the following:

- Your contact details – these will include your email and residential address
- Your date of birth
- Proof of your identity – you may be asked to provide certified copies of your identification documents.
- Your curriculum vitae and proof of your qualifications – where relevant, you may be asked to provide certified copies.
- You may be asked to complete a fitness and proprietary declaration including, where relevant, a criminal records declaration to declare any unspent convictions.
- Where relevant, we will contact your referees, using the details you provide to us, directly to obtain references.
- You may be asked to provide other personal information in line with relevant law or regulation in the jurisdiction of the company to which you will be appointed.

Legal basis: contract performance and complying with our legal obligations

3.11. Other uses

In addition to the specific uses described above, BII may process personal data where this is necessary for compatible operational, administrative, legal, regulatory, security or governance purposes, provided we have an appropriate lawful basis to do so.

- **Accounts:** including keeping accounts relating to any business and activity carried out by BII and keeping records of purchases, sales and transactions;
- **Safety and security:** any method, system or process used by BII to protect its physical and intellectual property, to protect its economic and financial interests and to protect the integrity of its directors, employees, investees and stakeholders. This may include the use of CCTV in and around our offices for the purposes of premises security, incident investigation and the safety of our staff and visitors.
- **IT support and development:** including processing as part of security event logging and monitoring of systems, business continuity planning and disaster recovery.
- **Compliance and legal claims:** including ensuring compliance with legal obligations or establishing, exercising or defending legal claims;
- **Scientific, historical and statistical research:** including the collection and processing of personal data for statistical surveys (or necessary to reach statistical results), analysing earlier events, and establishing patterns and rules of conduct;
- **Mergers and acquisitions:** To prepare for and carry out a merger, take-over, transfer of an undertaking, transfer of assets or any other type of corporate transaction; and
- **Any other purpose** described and communicated to you prior to using your personal data for such other purpose.

We will only process personal data for the purposes for which it was collected, unless we reasonably consider that we need to use it for another purpose that is compatible with the original purpose and permitted by applicable law.

BII will notify the processing of personal data to the relevant authorities to the extent required under all applicable data protection laws and regulations.

4. Data Accuracy

It is important for us to maintain accurate and up to date records of your personal data. Please inform us of any changes to or errors in your personal data as soon as possible by contacting the DPO at dataprotection@bii.co.uk. We will take reasonable steps to make sure that any inaccurate or out-of-date data is deleted, destroyed or amended accordingly.

5. Records Retention

We keep personal data only for as long as is necessary for the purposes described in this notice, including to meet legal, regulatory, tax, accounting and reporting requirements. Retention periods may vary depending on the type of personal data and the reason we hold it. When personal data is no longer required, we will securely delete or anonymise it in accordance with our retention requirements. If you would like more information about how long we are likely to keep particular personal data, please contact the DPO.

6. Data security

We shall ensure that appropriate technical and organisational security measures are taken against unlawful or unauthorised processing of personal data, and against the misuse, destruction, disclosure, acquisition, accidental loss of, or damage to personal data. Personal data shall only be processed by a third-party processor if they can demonstrate adequate compliance or certification to relevant information security standards and practices.

BII has implemented an information security management system to protect the confidentiality, availability and integrity of our assets, including protection of information processing facilities and your personal data.

7. Disclosure of personal data

For the above-mentioned purposes, we may disclose your personal data to the following categories of recipients:

7.1. Categories of recipients

- Authorised staff members of British International Investment plc
- Corporate affiliates and subsidiary companies of British International Investment – a full list of these, can be provided upon request;
- Business partners: trusted companies that may use your personal data to provide you with the services and/or the information you requested and/or that may provide you with communications (if you have consented to receiving them). We ask such companies to always act in compliance with applicable laws and this privacy notice and to pay high attention to the confidentiality of your personal data. A full list of our business partners can be provided upon request.

7.2. Service providers

Service providers are a core part of our IT, communications and business strategy. BII may share your personal data with external providers of IT related services and communication agencies.

A full list of service providers can be provided upon request.

7.3. Other parties when required by law or as necessary to protect BII

BII may share your personal data with other third parties:

- to comply with the law, regulatory requests, court orders, subpoena, or legal process;
- to verify or enforce compliance with BII's policies and agreements; and
- to protect the rights, property or safety of BII and/or its clients.

7.4. Other parties in connection with corporate transactions:

BII may share your personal data with other third parties in the context of a divestiture of all or a portion of its business, or otherwise in connection with a merger, consolidation, change in control, reorganisation or liquidation of all or part of BII's business.

7.5. Other parties with your consent or upon your instruction:

BII may share your personal data with:

- third parties when you consent to or request such sharing; and
- Any other third party communicated to you by BII prior to sharing your personal data with that third party.

8. Use of social networks

BII sometimes facilitate the publication of personal data (and other information) via social media such as Twitter and Facebook. These social media platforms have their own terms of use and privacy notices which you are required to consider and observe if you make use of them. Publication on social media may have (undesired) consequences, including for your privacy or that of persons whose data you share, such as the impossibility of withdrawing publication in the short term. You must consider these consequences yourself as BII does not accept any responsibility in that regard.

9. Disclosures outside the UK, or the EEA

Your personal data may be transferred to, stored in or accessed from countries outside the UK or EEA by BII or the recipients described in this notice. Some of these countries may not provide a level of protection for personal data that is regarded as equivalent to that in the UK or EEA. Where this happens, BII will take appropriate steps to protect your personal data in accordance with applicable data protection law. These steps may include relying on adequacy regulations or decisions, entering into appropriate contractual safeguards, and implementing additional measures where required. If you would like more information about international transfers and the safeguards we use, please contact us at dataprotection@bii.co.uk.

Similarly, personal data may also be transferred from countries other than the UK where BII has an office, including Bangladesh, Egypt, Ghana, India, Kenya, Nepal, Nigeria, Pakistan, Singapore and South Africa. Where such transfers take place, BII will also ensure that appropriate safeguards are in place to protect the personal data transferred from those countries in accordance with applicable data protection laws.

10. Your choices and your rights

We want to be as transparent as possible with you, so that you can make meaningful choices about how you want us to use your information.

10.1. Your choices

In this context, you can make a variety of choices about how you want to keep in touch with us, through which channel (e.g. email, mail, social media, etc.), for which purpose and how frequently, by contacting us at dataprotection@bii.co.uk or by following the unsubscribe instructions included in the communication. Please note, if we have an ongoing relationship with you, you may continue to receive marketing communications from us you have the right to object to receiving these communications (other than essential service communications) at any time.

10.2. Your rights

You have rights (with some exceptions and restrictions) to:

- object to our processing of your personal data, including profiling. You can object, on grounds relating to your particular situation, at any time. In which case, we shall stop processing the data that your objection relates to, unless we can show compelling legitimate grounds to continue that processing;
- access your personal data. If you make this kind of request and we hold personal data about you, we are required to provide you with information on it, including a description and copy of the personal data and why we are processing it;
- request that we provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format;
- request erasure of your personal data in certain circumstances;
- request correction or updating of the personal data that we hold about you and that is inaccurate;
- request the restriction of our processing of your personal data in some situations. If you request this, we can continue to store your personal data but are restricted from processing it while the restriction is in place;
- to object to, and not be subject to a decision which is based solely on automated processing (including profiling), which produces legal effects or could significantly affect you; and
- complain to your local data protection authority or seek a judicial remedy from your national court about our collection or use of your personal data. For example, in the UK, the supervisory authority is the UK Information Commissioner's Office, although we would like the prior opportunity to respond to any complaint.

If you choose to exercise the rights described above, we may ask you to provide additional information so that we can satisfy ourselves as to your identity before we take further action.

If you would like to exercise any of these rights, please contact us using the details in section 7. We will consider and respond to your request in accordance with applicable law.

11. How to contact us or submit a complaint

If you have any privacy questions about this notice or how we process your personal data, or if you want to exercise your rights, you can contact us at dataprotection@bii.co.uk.

If you have any concerns or complaints about how BII processes your personal data, including any concern that we may have infringed applicable data protection law in relation to your personal data, you have the right to raise this directly with us. You can submit a data protection complaint by contacting us at **dataprotection@bii.co.uk**. We will acknowledge receipt of your complaint within 30 days. We will then take appropriate steps to investigate and respond to your complaint without undue delay, including making relevant enquiries, keeping you informed of progress where appropriate, and telling you the outcome without undue delay once our review is complete. If you are not satisfied with our response, or if you consider that your complaint has not been handled appropriately, you have the right to complain to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection matters.

12. Definitions

In this Definitions section, we explain some of terminology used in this notice. **BII** means British International Investment plc, its affiliated companies and subsidiaries.

- **Data controller** or **Controller** means the organisation which determines the purposes for which, and the way, any personal data is processed. For the purposes of this notice, the controller(s) are BII and each of the British International Investment companies listed in Appendix A.
- **Data Protection Officer** or **DPO** means the data protection officer appointed by BII in the relevant jurisdiction.
- **Data subjects** means all individuals about whom BII holds personal data.
- **Personal data** is any data relating to a living individual which allows the individual to be identified, whether from the data alone, or in combination with other information.
- **Processing** means any operation or set of operations which is performed upon personal data, such as the collection, recording, organization, storage, adaption or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, blocking, erasure or destruction of personal data.
- **Processor** means the individual and/or organisation which processes personal data on behalf of the Controller.
- **Special category data** means personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade-union membership, data concerning health, sexual orientation or sex life. Special provisions apply to the processing of special category data.



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Twitter @BritishIntInv

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