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PRIVACY POLICY

Yellow Brick Capital (UK) Limited is committed to respecting your privacy and complying with applicable data protection and privacy laws.

Yellow Brick Capital (UK) Limited is the data controller and we are responsible for your personal data. We have appointed a Data Protection Officer (DPO) to be responsible for responding to questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the DPO.

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

Types of data: Your personal details such as given name, date of birth, title. Contact details including address, telephone numbers and email addresses. Business information such as job title, name of employer, details of business, and other information provided in the course of the contractual or client relationship between you or your organisation and Yellow Brick Capital (UK) Limited or its affiliates, or otherwise voluntarily provided by you or your organisation. Passport details or immigration status. Financial details including billing address, bank account numbers, cardholder or accountholder name and details, transaction details. Anti-money laundering information which the law requires us to collect in relation to clients such as national identity card, utility bills, bank statements and similar documents. Any other personal information you choose to give us when contacting us or instructing us or which is provided to us by a client in the course of obtaining legal services. Operational personal data such as CCTV footage, recordings of telephone conversations or logs of visitors and notes of meetings. Information from cookies on our website, including Internet Protocol (IP) address, approximate location, browser type and version, device type, time zone setting, operating system and platform.

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Third parties or publicly available sources: Publicly accessible resources such as Companies House or the Land Registry. Financial and transaction data from providers of technical, payment and delivery services. From a third party with your consent such as your bank, any consultants or professionals you may engage, law enforcement authorities, or your employer.

How we use your data: To register you as a client, if applicable. To provide and administer information, advice and services to our clients. To run our business affairs, including internal record keeping, conflict checking, training, supervision and auditing. To comply with our compliance obligations and other laws and regulations

Disclosure of Personal Data to third parties: Contractors or agents working on our behalf, regulatory bodies as required by law, registrars such as Companies House, credit reference agencies, anti-fraud services, third party service providers who perform functions on our behalf under contract, governmental, legal, tax and regulatory or similar authorities, and central and/or local government agencies, upon request or where required, any relevant party in connection with AML/KYC requirements;

How long we keep the information: We keep your information for as long as necessary to fulfil the purposes for which we collected it, we take every step to ensure that that will be for the minimum period necessary. We may need to retain your information for longer in order to comply with legal and

regulatory requirements or use it where we need to for our legitimate purposes. Financial and statutory reporting requirements mean we must keep certain records for a period of 8 years. When we do not need your information for any longer, we will either: permanently delete or destroy the relevant Personal Data, archive your Personal Data so that it is beyond use or anonymize the relevant Personal Data.

Consent: Through agreeing to this Privacy Notice you are consenting to Yellow Brick Capital (UK) Limited and its affiliates processing your personal data for the purposes outlined. You can withdraw consent at any time.

Your rights: You have the right to exercise any of your privacy rights after sending a request in writing. Your rights are as follows: the right to request access to, or copies of, your Personal Data that we process or control, together with information regarding the nature, processing and disclosure of those Personal Data; the right to request rectification of any inaccuracies in your Personal Data that we process or control; the right to update the information we hold about you, the right to request, on legitimate grounds, to have your Personal Data that we process or control transferred to another controller; the right to request the restriction of processing of your Personal Data that we process or control; the right to lodge complaints with a Data Protection Authority regarding the processing of your Personal Data by us or on our behalf; the right to withdraw consent at any time where we are relying on consent to process your personal data; the right to request that your information be erased.

Data security

We have implemented appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality. We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so. Nevertheless, we cannot guarantee the security of the personal data that you transmit over our website.

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