

## PRIVACY POLICY

At Angel Capital Scotland, we value and respect your privacy and are keen to ensure that we are clear about the data we collect, how we use it and your rights to control that information. We respect your personal data and have never and will never sell it to third parties although information may be shared with third parties from time to time.

**Please read this policy carefully to understand more about the information we may collect, use and share. The terms Angel Capital Scotland, ACS, 'we' or 'us' each refer to Angel Capital Scotland Limited.**

### Data Controller

For the purpose of the Data Protection Laws, the data controller is Angel Capital Scotland Limited, c/o Wright, Johnston & Mackenzie LLP, St Vincent Plaza, 319 St Vincent Street, Glasgow, G2 5RZ  
YOUR INFORMATION

Personal information is any information that can be used to identify you or that we can link to you. This privacy policy explains:

- the personal information we collect from you, either directly or indirectly;
- how and why we use it;
- who we share it with;
- the rights to which you may be entitled;
- your choices about how we use your personal information;
- Information you provide to us.

We collect information that you voluntarily provide to us, such as your name, phone number and email address. This happens, for example, when you subscribe to an ACS mailing list, meet one of our partners or employees and exchange a business card or business plan/presentation or when you contact our office. We may also obtain information from individuals in their capacity as representatives of organisations, including business contact details and other personal information relating to those individuals.

### Information we collect automatically

We collect some information about you using cookies or other similar technologies when you browse our website or connect to the internet via ACS staff wi-fi at any of our offices or if you open or click on links in electronic communications from us.

The servers hosting ACS's website automatically record certain information about you when you use the site, including details of your domain name, IP address, operating system and browser. LINC may use this information to understand who has seen which pages in order that ACS can monitor and improve the ACS website.

Where we retain information contained in the contact forms collected via the ACS website. This information is stored pursuant to the ACS privacy policy.

The ACS website provides links to other websites. Our Privacy Policy applies only to this site and we are not responsible for the privacy practices of third party sites.

### Information collected from other sources

We may receive information about you from other sources, including payment processing companies, your bank, credit reference agencies or data brokers. We may also receive information about you from social media platforms, for example when you interact with us on such platforms.

## HOW WE USE THIS INFORMATION

We use the information we collect to provide you with the services we offer and to communicate with you, including, for example, informing you about ACS, and both upcoming and recent events. We also use information for business operations, security, safety and dispute resolution.

### Funding from ACS Members

You may contact us about obtaining funding from Angel Capital Scotland members, or discussions which may lead to or result from such funding. As a result, you may provide us with personal information which we may use to identify and contact you, to verify information you have provided, to undertake background and reference checks, to prevent and detect crime and to comply with relevant laws and regulations. The processing of some of this information is required by law because of anti-fraud obligations or in the public interest to comply with requirements to verify the identities of counterparties.

### Communications, marketing and advertising

We use data that we collect to deliver and personalise our communications with you. We may, for example, contact you by email or by other means of electronic communication (including by social media platforms) to inform you about news concerning ACS, to invite you to attend events hosted or sponsored by ACS.

### Business operations

We use data collected to enable us to operate, protect, make informed decisions, and report on the performance of our business. This processing is necessary to serve our legitimate interests.

## WHY WE COLLECT AND HOW LONG WE KEEP YOUR INFORMATION

We collect and use your information for a variety of reasons. We need some information to enter into and perform a contract with you – for example your contact and payment details.

Some information processing is required by law under our anti-fraud screening obligations or in the public interest including making sure we verify our customers' identities.

Some information is processed because you have given your consent to that, which can be withdrawn.

We collect other information because we have legitimate business interests in doing so, for example, in:

- Understanding how you use our products, services and websites;

- Understanding and responding to feedback;
- Researching, analysing and improving our services;
- Maintaining a public profile on both traditional and social media;
- Providing security over our business and who we trade with; or
- Developing and maintaining relationships with vendors, partners and other companies and dealing with individuals who work for them in our sector.

We will keep your information for as long as it is reasonably necessary. How long depends on factors such as whether you have any contractual agreements in place with us or have interacted with recent offers and services. We will also routinely refresh our information to ensure we keep it up-to-date.

### Legal requirements

We need to collect certain types of information to allow us to comply with legal requirements relating to our anti-fraud / anti-money laundering / know your customer obligations. If this information is not provided we cannot provide you with a product or service.

Your personal information may also be processed on reasonable request by a law enforcement or regulatory authority, body or agency or in the conduct or defence of a legal claim. We will not delete personal information if relevant to an investigation or a dispute. It will continue to be stored until those issues are fully resolved.

### INFORMATION WE SHARE

There are certain circumstances where we may transfer your personal data to employees, contractors and to other parties.

- We may share your information with certain contractors or service providers. Our suppliers and service providers will be required to meet our standards on processing information and security. The information we provide to them, including your information, will only be provided in connection with the performance of their function;
- We may also share your information with certain third parties. We will do this either when we receive your consent or because we need them to see your information to provide products or services to you. These include credit reference agencies, anti-fraud databases, screening agencies and other partners we do business with.

Your personal information may be transferred to other third-party organisations in certain scenarios:

- If we are required to by law, or under any regulatory code or practice we follow, or if we are asked by any public or regulatory authority – for example the Police;
- If we are defending a legal claim your information may be transferred as required in connection with defending such claim;
- Your personal data may be shared if it is made anonymous and aggregated, as in such circumstances the information will cease to be personal data.

### WHERE YOUR INFORMATION WILL BE HELD

We store our information on computer systems operated by Angel Capital Scotland.

We will only transfer data to jurisdictions outside the scope of the European General Data Protection Regulation (GDPR) where the appropriate safeguards set out in the GDPR are in place.

## YOUR RIGHTS

You may have certain rights in relation to your information including a right to access or to correct the information we hold on you.

We have listed the rights you have over your information and how you can use them below.

These rights will only apply in certain circumstances. They will generally not be available if there are outstanding contracts between us, if we are required by law to keep the information or if the information is relevant to a legal dispute.

- You can remove consent, where you have provided it, at any time;
- You can ask us to confirm if we are processing your information;
- You can ask for access to your information;
- You can ask to correct your information if it is wrong;
- You can ask us to delete your information;
- You can ask us to restrict how we use your information;
- You can ask us to help you move your information to other companies;
- To help with that, you have a right to ask that we provide your information in an easily readable format to another company;
- You can ask us to stop using your personal information, but only in certain cases;
- You have the right to complain to the relevant supervisory authority.

## CHANGES TO THE POLICY

This policy is kept under review and will be changed from time to time.

## COOKIES

To optimise your experience on the ACS website we use cookies that identify your browser or device. They collect and store information when you visit our website about how you use it. You can find out more about how we use cookies here: <https://angelcapital.scot/cookies/> For information on managing your email subscriptions please see the section of this policy headed "Your Rights".

## SECURITY

We are committed to keeping your personal information safe. We have put in place physical, technical and administrative measures to prevent unauthorised access or use of your information.