



**GROWTH  
INVEST**

GROWTHINVEST  
PRIVACY POLICY

## 1. INTRODUCTION:

We take your privacy very seriously and are committed to maintaining the privacy and security of information you provide to us. Please read this document carefully to understand our policies regarding your personal data and how we will collect, store and use your personal data and the rights you have in connection with the same.

Who we are:

GrowthInvest.com (the “Website”) is owned by EIS Platforms Ltd, trading as GrowthInvest (“GrowthInvest”, “we” or “us”), a private limited company in England and Wales (company registration number 08018312) with its registered office at 4<sup>th</sup> Floor, 25 Copthall Avenue, London, EC2R 7BP.

The data controller (as defined under European Data Protection Legislation) for GrowthInvest.com is EIS Platforms Ltd. We are registered as a data controller with the Information Commissioner’s Office and our registration number is ZA114581.

If you have any questions or concerns about this Privacy Policy you can contact us at [privacy@GrowthInvest.com](mailto:privacy@GrowthInvest.com) or 020 7071 3935 or via post to GrowthInvest, 4<sup>th</sup> Floor, 25 Copthall Avenue, London EC2R 7BP. You also have the right to make a complaint directly to the Information Commissioner’s Office.

### About this Privacy Policy

This Privacy Policy sets out how we collect, use and protect your personal information. ‘Personal information’ is information which identifies you or another person, or which is capable of doing so. It applies to information we collect about you through this Website and when you communicate with us in other ways, make a transaction, or is provided to us by third parties such as financial advisers or fund managers, or that we collect through available 3<sup>rd</sup> party information and research.

By visiting our Website or by supplying us with your Personal Information, or by consenting to a third party to do so on your behalf, you are accepting and consenting to the practices described in this Privacy Policy.

In the event that you disclose to us any Personal Information that relates to any other person, such as a financial adviser disclosing information or registering their clients, you represent and warrant (i) that you have obtained that person’s prior consent to the disclosure of such Personal Information and its processing, storage and use in accordance with this Privacy Policy; (ii) you are lawfully authorised to use the Website or provide their Personal Information on behalf of such person, and to bind that person to this Privacy Policy; and (iii) you shall indemnify us for all loss suffered, or likely to be suffered, by us as a result of any breach of the above warranties and representations.

Where you authorise an adviser to register on, and use, the Website or any other services provided by us on your behalf, then you acknowledge and agree that we are entitled to use the Personal Information provided by such adviser as if it was provided directly by you, to the extent this information is required by us to provide the services requested by the adviser on your behalf. If you no longer wish an Adviser to use the Website on your behalf please contact us at [privacy@growthinvest.com](mailto:privacy@growthinvest.com) or on 020 7071 3945.

You may withdraw your consent to the use of your Personal Information in any of the ways set out in this Privacy Policy or adjust your communication preferences at any time by contacting us at [privacy@growthinvest.com](mailto:privacy@growthinvest.com) or 020 7071 3945. If you do withdraw your consent, we may still be able to process some of the Personal Data that you have provided to us on other grounds such as legitimate interest or to uphold our legal obligations. (See **Section 3** below)

This Privacy Policy may change from time to time and, if it does, the up-to-date version will always be available on our Website, and we will alert you to any significant changes. Please note that by continuing to use our Website you are agreeing to any updated versions.

## 2. INFORMATION WE MAY COLLECT FROM YOU OR ABOUT YOU

When you register on our Website and while you continue to use the services provided by us, or request information from us we may collect and process the following types of Personal Information:

- i) Information that is provided by you when you complete forms, the registration process, your profile, post information or questions, or request information from or via the Website or us. This will include your name, title, contact information (including e-mail addresses, mailing address and telephone numbers), your certification as an investor (for example as a High Net Worth or Sophisticated investor) and additional details such as investment interests and experience.
- ii) Information in relation to any transactions that you undertake on our Website or with us. This may include full details relating to the transaction, your bank details (for dividend payments), your date of birth, national insurance number and details to confirm your identity such as driving licence, passport or utility bill information.
- iii) Information that you, or a third party such as your financial adviser, or a fund manager may provide about your existing or historical investments. This could be used to register and make visible assets on the platform, or used as part of an asset transfer process, which would usually require your specific permissions.
- iv) If you are a business user, we will collect information from you such as name, email address and other corporate information. We will use this information to allow authorised business users to access the permitted levels of information within our Website.
- v) Information about your computer (e.g. IP address, browser type and version etc) and in relation to your visits to our Website (e.g. pages visited, information downloaded or requested etc.). This can include using a “cookie” which would be stored on your browser. Cookies are temporary internet files which are used to enhance the ease of using our Website. Please see Section 6 below for full information about our Cookie policy.
- vi) Information that you may provide in relation to any research, questionnaires or surveys that we may make available or publish.
- vii) We may also receive additional information about you from sources such as the Financial Conduct Authority, and Companies House, or if we run specific identity and anti-money laundering checks through authorised 3<sup>rd</sup> party partners, such as Onfido.com .
- viii) Information that you may provide when you write to us by e-mail or post and information that you may provide to us in telephone calls.

### 3. HOW WE WILL USE YOUR INFORMATION

We may use your Personal Information for the following purposes:

- i) To aid the administration, effectiveness and use of our Website, its content and your GrowthInvest account, including its use to ensure that such information is accurate and remains updated.
- ii) As part of our efforts to keep the Website safe and secure and to verify your identity in order to prevent and detect crime and money laundering.
- iii) To deal with any communications, request for information, services or complaint that we may receive from you.
- iv) To pass onto selected third parties, including fund managers, investee companies and other product providers, as well as nominee and custodians in respect of your decision to carry out investment transactions or to make an application for an investment via us.
- v) In order to carry out any obligations relating to transactions that may be undertaken on the Website or otherwise, including our regulatory duties
- vi) To send you newsletters and other marketing communications from time to time, which will include investments, news, events and updates which we believe may be of interest to you, by post, telephone or by email when you have consented to be contacted for such purpose. You will always have the ability to opt out of the receipt of these at any time.
- vii) In order to enforce or monitor compliance of any other terms and conditions that you have agreed with us, or that relate to the protection of our rights, our customer's rights, the security of the website, the detection or prevention of fraud or issues relating to credit risks
- viii) To carry out anonymised statistical analysis and market research and to develop and improve our services and products
- ix) To comply with the law and our legal obligations.
- x) As we feel may reasonably feel to be necessary to prevent illegal activity or to protect our interests.



## 4. LEGAL BASIS FOR PROCESSING PERSONAL INFORMATION

The legal bases that we rely on for processing your Personal Information are:

- i) *You have provided your consent to us using your Personal Information for a specific purpose:*

We will ask for your consent to use your Personal Information to send you marketing emails and communications.

You always have the right to withdraw your consent at any time.

- ii) *It is necessary in connection with the performance of a contract with you:*

Sometimes it is necessary to process your Personal Information so that we can enter into contractual relationships with you or comply with a request that you may make. For example, if you make an investment via us, or request further information, we will require your Personal Information to enable us to perform our obligations.

- iii) *It is necessary for compliance with a legal obligation to which we are subject:*

This would include where we have to retain certain Personal Information or records, for example, for the detection and prevention of crime, safeguarding obligations, for maintaining suppression lists to ensure we comply with marketing laws, for tax reasons and undertaking due diligence before accepting applications or entering into certain relationships.

- iv) *It is within our legitimate interests.*

Applicable law allows Personal Information to be collected and used if it is reasonably necessary for our legitimate interests or a third party's legitimate interests (as long as the processing is fair, balanced and does not unduly impact individuals' rights). We will rely on this ground to process your Personal Information when it is not practical or appropriate to ask for your consent, and where we are confident that this will not impact your rights. This may include where we undertake research on individuals including before we proactively contact them.

Our legitimate interests include raising funds and investments for a wide range of funds, portfolios and investee companies, and ensuring that we target appropriate and qualified individuals for these investment opportunities. We have a legitimate interest in ensuring that financial advisers and other third parties are aware of investment opportunities that may be of interest to their clients, where we know or believe through our own or third party sources (see Section 5 below) that they are active in, or have an interest

in these areas. We also have a legitimate interest in publicity and campaigning in more general terms about the benefits and advantages of tax efficient and alternative asset investing.

We also have a legitimate interest in undertaking due diligence to establish the provenance of investments opportunities that are made, or may be made available, via us.

Where you have provided your details to us, we may contact you by post and phone and where you have provided consent, by e-mail for certain marketing and related activities as set out in **Section 2** (but we will explain this to you at the point that we collect your details). You can opt out of this activity at any time by emailing us on [privacy@growthinvest.com](mailto:privacy@growthinvest.com) or 020 7071 3945

We will also rely on our legitimate interests for the proper administration and the management our operations (for example, maintaining appropriate records and databases, for the detection and prevention of crime and safeguarding data).

When we process your Personal Information to achieve such legitimate interests, we consider and balance any potential impact on you (both positive and negative), and your rights under data protection laws. We will not use your Personal Information for activities where our interests are overridden by the impact on you, for example where use would be excessively intrusive (unless, for instance, we are otherwise required or permitted to by law).

## 5. DISCLOSURE OF YOUR INFORMATION

We may share your Personal Information with any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in Section 1159 of the UK Companies Act 2006.

When we share your information with third parties they will process your Personal Information as either a data controller or as our data processor and this will depend on the purposes of our sharing your Personal Information. We will only share your Personal Information in compliance with any applicable data protection legislation.

We may disclose your Personal Information to third parties when:

- i) you specifically request this, such as when you submit information to enquire about a specific investment, or request a call back from a client, or request a meeting.
- ii) When you make an investment via an application form, your Personal Information will be disclosed to the investee company and if applicable the custodian, nominee company or fund manager;
- iii) We are under a duty to disclose or share your Personal Information in order to comply with any legal obligation or to protect our rights, property or safety of the Website, our customers, or others. This includes exchanging information with third parties for the purposes of fraud protection and credit risk reduction.
- iv) In the event that we sell or buy any business or assets, in which case we may disclose your Personal Information to the prospective seller or buyer of such business or assets;
- v) If the Website or substantially all of its assets are acquired by a third party, in which case Personal Information held by it about its customers will be one of the transferred assets;

The third parties include:

- i) Business partners, clients, suppliers and sub-contractors for the performance of any contract we enter into with them or you (these currently include, without limitation, Salesforce.com (for CRM purposes), Mailchimp (for digital marketing and email campaigns), Platform One (who act as our custodian and nominee) and Onfido.com (who we use for identity checks); and
- ii) Analytics and search engine providers that assist us in the improvement and optimisation of the Website.

We may share some broader statistics and customer profiling information with third parties, but the data is anonymised, so you would not be identifiable from that data. We will never rent or sell our users' details to any other organisation or individual.



## 6. COOKIE POLICY

Our Website uses cookies to distinguish you from other users and to improve your experience on our Website and to recommend content that may be of interest to you. When you visit the Website, we will ask you whether you agree to our use of cookies. You can indicate your acceptance of our use of cookies by clicking “Continue” in the appropriate place on the banner that appears on the Website. However, please note that if you do not click “Continue” but do go on to browse the Website, you will be deemed to have accepted our use of cookies in accordance with this Privacy Policy. If you do not agree to our use of cookies, then you may continue to use the Website but your browsing experience may be affected. You can find out more below about what cookies are, the cookies we use and how to switch off cookies.

What are cookies?

A cookie is a text file containing small amounts of information which is downloaded to your device when you access a website. The text file is then sent back to our server each time your browser requests a page from the server. This enables us to operate the Website more effectively and load the Website in such a way as to reflect your personal preferences based on your previous browsing on the Website, as well as keywords we may be able to gather from URLs of webpages from which you accessed the Website.

What cookies do we use?

We use the following cookies:

- i) **Analytical and performance cookies.** We may use analytics service providers for website traffic analysis and reporting. Analytics service providers generate statistical and other information about the use of the Website by using cookies. They allow us to recognise and count the number of visitors and to see how often visitors return to the Website, how long they stay and how visitors move around our Website when they are using it. This helps us to improve the way our Website works, for example, by ensuring that users are finding what they are looking for easily. The information generated relating to the Website may be used to create reports about the use of the Website and the analytics service provider will also store this information.
- ii) **Advertising and targeting cookies.** These cookies record your visit to our Website, the pages you have visited and the links you have followed to other websites. We will use this information to try and make our Website and other websites that you visit more relevant to your interests.
- iii) **Functionality cookies.** We may use functional cookies that allow us to remember choices you have made in relation to the Website so as to provide a more personalised experience and enhanced user experience by delivering content specific to your interests.
- iv) **Strictly necessary cookies.**

### Third party cookies

We add buttons to allow people to easily share to those networks. When we include these social 'plugins', it gives those sites the flexibility to use cookies. They can't read any cookies we set from our Website, and we can't read any cookies they set, but it lets them do the same kind of traffic measuring that we do on the rest of the Website, and it also lets them know whether you're logged in. Other websites and services (including, for example, advertising networks, providers of external services like web traffic analysis services and content recommendation engines) may also use cookies, over which we have no control. These cookies are likely to be analytical/performance cookies or targeting cookies.

### How do I turn cookies off?

If you would like to opt out of cookies, you can change the settings on your internet browser to reject cookies. For more information please consult the "Help" section of your browser. Please note that if you do set your browser to reject cookies, you may not be able to use all of the features of our Website.

## 7. STORAGE AND THE SAFEGUARDING OF YOUR PERSONAL INFORMATION

The data that we collect from you may be transferred to, and stored at, a destination outside of the European Economic Area (“EEA”). It may also be processed by staff operating outside the EEA who work for us or one of our suppliers. By using the Website or our services, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy.

We follow strict security procedures as to how your Personal Information is stored and used, and who sees it, to help stop any unauthorised person getting hold of it. All Personal Information you register on our Website or provide to us will be located behind a firewall. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access. We are committed to ensuring that there are appropriate technical controls in place to protect your Personal Information including protection from misuse and unauthorised access.

Your Personal Information is only accessible by staff, and contractors who are bound by appropriate policies and procedures to protect your information.

Unfortunately, the transmission of information via the internet is not completely secure and although we do our best to protect your Personal Information, we cannot guarantee the security of your data. So, on this basis we cannot accept any liability for the loss, theft or misuse of any Personal Information which you have registered on the Website or if there is a security breach relating to its transmission over the internet.

We will keep your Personal Information stored on our systems for as long as it takes to provide the services to you and to undertake our obligations as set out in this Privacy Policy. The third parties we engage to provide services on our behalf will keep your data stored on their systems for as long as is necessary to provide the services to you and to undertake our obligations as set out in this Privacy Policy. We will not store your Personal Information for longer than is reasonably necessary or required by law.

## 8. YOUR RIGHTS

Please note that you may only use/ benefit from some of the following rights in limited circumstances. For more information, we suggest that you consult guidance from the Information Commissioner's Office (ICO) – please click [here](#) - or please contact us by post the attention of the Operations Director at the address below, or by contacting us at [privacy@growthinvest.com](mailto:privacy@growthinvest.com) or 020 7071 3945. In exceptional circumstances we may reserve the right to charge a small administrative fee to do so, but this would always be agreed with you in advance.

i) *Right to restrict processing*

In certain circumstances as outlined in the ICO guidance referred to above, you have a right to require us to stop processing your Personal Information in a particular way.

ii) *Right to erasure*

You have the right to request that your Personal Information is erased from our records in certain circumstances.

iii) *Right of access*

You have a right to ask for a copy of the Personal Information we hold about you. If you want to access your Personal Information, please send a description of the Personal Information you want to see and proof of your identity for the attention of the Operations Director at the address set out below.

iv) *Right to rectification*

We also want to make sure that your Personal Information is accurate and up to date. Please let us know if your details change. You may also ask us to correct or remove Personal Information which is inaccurate.

v) *Right to object*

You can also opt-out of receiving all or some of our marketing/ investment communications or request that we stop processing Personal Information about you for certain purposes at any time by contacting us using the details below, or using the opt-out option which will be present on any e-mail communications.

vi) *Right to data portability*

In certain circumstances you have a right to data portability which means we will provide you (or a third party you nominate) with your Personal Information in a structured, commonly used and machine-readable format.

The Website may, from time to time, contain links to and from the websites of third parties. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any Personal Information to these websites.

## 9. CONTACT INFORMATION

Questions, comments and requests regarding this Privacy Policy should be addressed to:

The Operations Director  
GrowthInvest  
25 Cophall Avenue  
London  
EC2R 7BP

[privacy@growthinvest.com](mailto:privacy@growthinvest.com) or 020 7071 3945

## 10. DEFINITIONS

For the purposes of this Privacy Policy, (“European Data Protection Legislation”) is defined as, for the periods in which they are in force, the European Data Protection Directive 95/46/EC, all laws giving effect or purporting to give effect to the European Data Protection Directive 95/46/EC (such as the Data Protection Act 1998) or otherwise relating to data protection (to the extent the same apply) and, from 25 May 2018, the General Data Protection Regulation (Regulation (EU) 2016/679) (GDPR) or any equivalent legislation amending or replacing the GDPR.

A nighttime photograph of a modern cityscape. In the foreground, a curved building with a glass facade is illuminated from within, showing a bright interior. To the right, a tall, slender skyscraper (the Shard) is lit up with blue lights. Other modern buildings with lit windows are visible in the background. The sky is dark with some clouds. The overall scene is illuminated by city lights, creating a vibrant urban atmosphere.

[support@growthinvest.com](mailto:support@growthinvest.com)

020 7071 3945