Pallant Capital Limited – Privacy Notice

Last Updated: June 2026
Designated Contact: General Counsel
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1. **Introduction**: this privacy notice explains how we, Pallant Capital Limited, collect, use, store and protect your personal data in connection with our investment operations, asset management and family office administration. We operate strictly in accordance with the Data Protection Act 2018, the UK General Data Protection Regulation (UK GDPR), the Privacy and Electronic Communications Regulations (PECR) and The Data (Use and Access) Act 2025.

2. **The Types of Personal Data We Collect**: due to our investment focus, we process highly sensitive personal and financial data relating to family members, co-investors, employees, sellers and representatives of target portfolio companies which includes the following:

- **Identity Data**: full name, date of birth, nationality, passport details, and national identification numbers.
- **Financial Data**: bank account details and investment portfolios.
- **Due Diligence & KYC Data**: background check results and anti-money laundering (AML) verification documentation.
- **Contact Data**: residential addresses, corporate addresses, personal email addresses and phone numbers.

3. **How We Collect Your Personal Data:** we collect personal information through two primary methods: (i) directly from you: provided during onboarding, investment opportunities and applications, legal contracts or correspondence; and (ii) indirectly from third parties: sourced from private banks, fund administrators, public registries (e.g. Companies House) or due diligence providers.

4. **Purposes and Lawful Bases for Processing Data**: we will only use your personal data when permitted by law. Our primary uses and their corresponding lawful bases include:

Purpose/Activity	Type of Data	Lawful Basis for Processing
Onboarding investors and family members	Identity, financial, KYC	Contractual Necessity and Legal Obligation (AML compliance)
Executing and managing investments	Financial, identity, contact	Contractual Necessity and Legitimate Interests (Managing assets)
Conducting investment due diligence	Identity, KYC, public records	Legitimate Interests (Evaluating portfolio risks)

Office administration and security	Contact, network logs	Legitimate Interests (Protecting family office IT architecture)

5. **Who We Share Your Data With**: we do not sell personal data. To facilitate investments and administration, we share relevant details with trusted third parties, including:

- **Professional Advisors:** legal counsel, tax accountants and auditors.
- **Financial Institutions:** private banks and brokerage platforms executing transactions.
- **Regulatory Authorities:** HM Revenue & Customs (HMRC), the Financial Conduct Authority (FCA), or law enforcement if legally required.

6. **International Data Transfers**: our investment operations may involve transferring your personal data outside the UK. In compliance with DUAA's risk-based transfer tests, we ensure these transfers are executed only (i) to countries deemed “adequate” by the UK Government; or (ii) under appropriate safeguards, such as Standard Contractual Clauses (SCCs) or International Data Transfer Agreements (IDTAs) alongside rigorous Transfer Risk Assessments.

7. **Data Retention**: we retain your data only as long as necessary to fulfill the purposes we collected it for, including any legal, accounting, or regulatory reporting requirements. Investment transaction documents and KYC data are typically securely archived for a minimum of 7 years following the termination of the relevant investment vehicle or transaction contract.

8. **Your legal rights**: under the data protection laws, you possess specific rights regarding your data:

- **Right of Access (DSAR):** you may request copies of your personal data, but please note that pursuant to the DUAA, we will conduct reasonable and proportionate searches to satisfy these requests.
- **Right to Rectification:** you may request corrections to inaccurate information.
- **Right to Erasure:** you may request data deletion under specific legal conditions.
- **Right to Restriction or Objection:** you may object to or limit processing based on legitimate interests.

9. **How to Lodge a Complaint:** If you have a concern regarding how we handle your personal data, you have a statutory right under Section 164A of the Data Protection Act 2018 (as amended by the DUAA) to complain directly to us. Please see our separate complaints procedure for further information.