

Investor Privacy Notice

This privacy notice is provided by the Infinity SDC Group (“Infinity”, “us” and “we”), and it applies to ways in which we interact with individuals (“Data Subjects”, “you” or “your”) in connection with those who invest in us.

We respect the privacy of Data Subjects and this Privacy Notice describes how we collect, use, store, process, disclose and transfer information that we may collect from Data Subjects.

Your personal data – what is it?

Personal data relates to a living individual who can be identified from that data. Identification can be by the information alone or in conjunction with any other information in the data controller’s possession or likely to come into such possession. The processing of personal data is governed by the General Data Protection Regulation 2016/679 (the “GDPR”) and the Data Protection Act 2018.

How your information will be used

This notice explains how we process personal data about individuals. Where the Data Subject, is an institutional investor, then we will also process personal data about the directors, officers and ultimate beneficial owners of the institutional investor.

Processing your personal data

Collection of Personal Data: We collect personal data about you in accordance with applicable laws and regulations as follows:

- When you provide us with your personal data in an application form or in other documents (as part of an application process or at other times), by email, phone, or otherwise. This might include your name, address and other contact details (both electronic and mailing), proofs of name, address or authority to act, financial details (such as investment history, instruction details and transaction details) and tax information (such as tax residency and tax identification information).
- In the course of managing and administering our business relationship with you. This might include your (or an applicant’s) investments in Infinity and changes to the information provided as part of the application process. This will also include any copies of communications with you, including copies of electronic communications (in accordance with applicable laws and regulations).
- We receive your personal data from third parties who provide it to us such as your advisers, intermediaries, relevant legal and regulatory authorities or other third parties.

Sensitive Personal Data: We do not seek to collect or otherwise process your sensitive personal data.

The above data will be processed where the processing is required by law or regulation, where it is necessary for us to perform a contract with you, or to take steps at your request prior to entering into a contract; and where we have a legitimate interest in carrying out the processing, which may include but is not limited to the purpose(s) of:

- providing investor services to you (unless your interests outweigh these interest.
- managing our relationship with you efficiently (unless your interests outweigh these interests).
- monitoring and auditing compliance with internal policies and procedures, legal obligations and to meet requirements and orders of regulatory authorities.
- managing and operating the affairs of our business, and for the efficient management of our business as a whole (unless your interests outweigh these interests).
- maintaining and operating our IT operations (unless your interests outweigh these interests).

Disclosure of data to third parties

We share your personal data with entities within Infinity for legitimate business purposes, such as providing services to you.

In addition, we may from time to time, in accordance with the purposes described above and in accordance with applicable laws and regulations disclose your personal data to:

- Company Secretary provider
- Financial Advisers / auditors
- Companies House

Transfers of personal data outside of the European Union

We do not process or transfer any of your personal data outside of the EEU except where you, or your financial adviser, is based outside of the EEU.

Data retention

How long we hold your personal data will vary. The retention period will be determined by various criteria, including the purposes for which we are using it (as it will need to be kept for as long as is necessary for any of those purposes) and legal obligations (as laws or regulations may set a minimum period for which we have to keep your personal data).

For example, we may keep some of your personal data for the purposes outlined above and for as long as we maintain an ongoing relationship with you to manage our business relationship or you are lawfully included in our mailing list and have not unsubscribed.

After our business relationship is terminated, we may keep your Personal Data for up to 10 years after that date in order to maintain records in accordance with applicable laws and regulations which apply to Infinity and to respond to any regulatory requests or questions.

To the extent we are not permitted to delete your Personal Data for legal, regulatory, internal compliance and audit, or technical reasons we may keep your data for longer than 10 years. In such circumstances, we will ensure your personal data and privacy is protected.

Your rights

Under the General Data Protection Regulation (GDPR) and The Data Protection Act 2018 (DPA) you have a number of rights with regard to your personal data. You have the right to request from us access to and rectification or erasure of your personal data, the right to restrict processing, object to processing as well as in certain circumstances the right to data portability.

If you have provided consent for the processing of your data you have the right (in certain circumstances) to withdraw that consent at any time which will not affect the lawfulness of the processing before your consent was withdrawn.

You have the right to lodge a complaint to the Information Commissioners' Office if you believe that we have not complied with the requirements of the GDPR or DPA 18 with regard to your personal data, and in certain circumstances, you may seek a judicial remedy in respect of the right to rectification.

Identity and contact details of controller and data protection officer

Infinity SDC Limited is the controller and processor of data for the purposes of the DPA and GDPR.

This Privacy Notice may be updated from time to time. The latest version of the Privacy Notice is available upon request from the individual names below.

If you have any concerns as to how your data is processed you can contact:

Investor.Relations@InfinitySDC.com or you can write to Investor Relations using the address of: Suite 106-1, Fairbourne Drive, Atterbury, Milton Keynes, MK10 9RG.