

## DATA PROTECTION STATEMENT

The General Data Protection Regulations (GDPR) are directly applicable to all organisations holding or processing personal data – including HVC. HVC is a data controller in terms of the regulations and as such must comply with GDPR in how it processes and manages members personal data

HVC will necessarily hold personal data relating to you that capable of identifying you. That obviously includes names address's but can include other data. GDPR regulates how such data must be held so as to ensure data security and protect against unauthorised use of your personal data. HVC will process and share your data only in accordance with GDPR and where there is a legal basis and a clear purpose for us to do so.

HVC will only access your personal data;

- In order to assist in providing investment assessment for members
- For our own legitimate interest
- To comply with a legal obligation
- With your consent

As a member of HVC you have the following rights;

- Right to be informed about our processing of your data
- Right to correct data held
- Right to object to processing personal data
- Right to restrict processing of personal data
- Right to erase personal data
- right to access personal; data
- Right not transfer personal data

HVC is a data controller registered with the Information Commissioners office and in processing data we will adhere to the following principles;

**Data Lawfully Held** – We will hold personal data lawfully, fairly and transparently. We will obtain member's consent to store and use their personal data unless otherwise provided for. We will delete data which is excessive, inaccurate or out of date or where you ask us to

**Legitimate Interest** - We will also hold data and process data where it is necessary to serve the purposes or the legitimate interest of the member

**Necessary Purpose** -We will hold data only for the purposes of helping members assess any investment and only for so long as is necessary for the purposes of our Rules of Engagement. We will delete data that is no longer required or where requested by you.

**Members Right to Access Data** – HVC will provide electronic copies of personal data to individual data subjects on request. HBVC will also advise the data subject the data we are processing, where their data is stored and for what purpose.

**Right to be forgotten** – You are entitled at any time to request that HVC delete your personal data.

**Data portability** – You have the right to transmit your data from one data controller to another. To that end HVC will provide your personal data in a 'commonly used and machine readable format.'

**Privacy by design** – Privacy by design is now a legal requirement in GDPR. This means that security must be built into our processes from day one.  
Period for holding data – legal docs/personal data/non-investment data

**Third Party Access** – we will not pass your data on to third parties unless they have a legitimate interest, it is in line with our rules of engagement in relation to investments or related matters and we are satisfied that the third party are GDPR compliant.

**Purpose**- HVC will hold personal data only for the purpose of assessing investment opportunities and for no other purpose. Where personal data is held as an integral part of any legal documentation we will hold that data for so long as it is in the legitimate interest of the investor so to do. Unless you consent or request otherwise other data will be held for a maximum of 3 years.

**Security** – All personal data held by HVC will be held securely on Password protected PC's. These PC's are backed up into differing media, all password protected.

**Record of Data Processing** – We maintain a record of data processing so that you can be clear as to how your data is being used by HVC. This record was last updated on 25 May 2018 and shall be regularly monitored and reviewed at least every 2 years.

**Breach of Data Regulation** – We are obliged to notify the ICO of any breach of data regulation within 72 hours