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Authorised and regulated by the Financial Conduct Authority. FCA Registration Number: 776760.

## PRIVACY NOTICE

Your privacy is very important to us. This notice ("Privacy Notice") is provided by North Wall Capital LLP ("we" or "us") and sets out our policies with respect to the collection, sharing and use of personal information.

### HOW WE COLLECT INFORMATION ABOUT YOU

We may collect personal data about you through:

- information provided directly to us by you, or another person on your behalf, through our website, by email or post, or in person;
- information that we obtain in relation to any transactions between you and us;
- recording and monitoring of telephone conversations and electronic communications with you as described below; or

We may also, in some circumstances, receive personal information about you from third parties, such as service providers or trading counterparties, regulatory or law enforcement agencies, credit reference agencies and agencies



conducting background checks. Personal information may also be obtained from publicly accessible sources of information, such as public databases, industry associations, social media and online professional networks.

## WHY WE COLLECT INFORMATION ABOUT YOU

We may collect and use your personal information for the purposes of administering the relationship between us, marketing our products and services to you or the businesses with which you are associated, monitoring and analysing our activities, and complying with applicable legal or regulatory requirements.

We will use one of the permitted grounds under the applicable law to process your information. Such grounds include instances where you have given your consent and cases where your consent is not required under applicable law, such as where we are required to comply with a legal obligation, or where we or a third party determine that is necessary for our legitimate interests to collect and use your personal information.

The legitimate interests to collect your personal information may include any of the purposes identified above and any other purpose where we or a third party have determined that you have a reasonable expectation for us or a third party to collect or use your personal information for such purpose. You have the right to object to the use of your personal data for direct marketing purposes.

## WHAT ARE THE CONSEQUENCES OF FAILING TO PROVIDE YOUR PERSONAL INFORMATION?

As a regulated financial services firm, we are subject to legal and regulatory obligations that may require us to collect and store your personal information, such as the requirements to comply with the applicable law on prevention of financial crime, tax and regulatory reporting, or the rules on recording and monitoring of communications (as described below).

We may also need to collect and use your personal information for the purposes of entering into or performance of a contractual arrangement between us.

A refusal to provide us with personal information may, depending on the purpose for which your personal information is required, have various consequences such as us being unable to communicate with you, the termination of any service or other contractual arrangement between us, or, where we have a reasonable suspicion of illegal activity, we may be required to make a report to regulatory or enforcement agencies.

## THE TYPES OF PERSONAL DATA WE MAY COLLECT AND USE

The categories of personal data we may collect will depend on the nature of our relationship with you and the purpose of which information is being collected. Such personal data may include names, residential addresses or other contact details, signature, nationality, date and place of birth, national insurance or other tax identification number, copies of identification documents, bank account details, information about assets or net worth, or other sensitive information, such as certain special categories of personal data contained in relevant documents or materials.

## DO WE USE AUTOMATED DECISION-MAKING PROCESSES?

No.

## DO WE SHARE YOUR PERSONAL INFORMATION WITH THIRD PARTIES?

We may (to the extent relevant to the purpose for which we collect your information), share your personal data with third parties, such as:

- any person to whom we have a right or obligation to disclose personal data, or where we determine that disclosure is necessary to protect or defend our rights or property, including with regulators, courts of law, governmental, regulatory or law enforcement agencies;



- our internet, IT, telecommunications and other service providers, including legal advisers, accountants, payroll administrators, insurance and employee benefits providers and administrators;
- service providers and trading counterparties to our clients, including placement agents or distributors, brokers, banks, trading venues, clearing houses, custodians, corporate services providers, administrators of our funds, and providers of customer relationship management tools;
- credit reference agencies and other third parties conducting background checks in the context of employment or client, counterparty, or investment due diligence;
- any person, as directed by you; or

## TRANSFERS OF PERSONAL INFORMATION TO COUNTRIES OUTSIDE OF THE EUROPEAN ECONOMIC AREA (EEA)

Due to the international nature of our business, your personal data may be transferred to countries outside of the EEA, such as to jurisdictions where we or our clients conduct business or have a service provider, including countries that may not have the same level of data protection as that afforded by the EU General Data Protection Regulation and other data protection rules applicable to us (collectively, "Data Protection Law"). In these circumstances, we take steps to ensure that the recipient agrees to keep your information confidential and that it is held securely in accordance with the requirements of Data Protection Law, such as by requesting appropriate contractual undertakings in our legal agreements with service providers.

## FOR HOW LONG DO WE KEEP YOUR PERSONAL INFORMATION?

We will generally keep personal information about you for as long as necessary in relation to the purpose for which it was collected, or for such longer period if required under applicable law or necessary for the purposes of our other legitimate interests.

The applicable retention period will depend on various factors, such as any legal obligation to which we or our service providers are subject as well as on whether you decide to exercise your right to request the deletion of your information from our systems. As a minimum, information about you will be retained for the entire duration of any business relationship we may have with you, and for a minimum period of five years after the termination of any such relationship.

We will, from time to time, review the purpose for which we have collected information about you and decide whether to retain it, update it, or securely delete it, if the information is no longer required.

## WHAT ARE YOUR RIGHTS?

You have certain rights under Data Protection Law in respect of the personal data we hold about you and which you may exercise. These rights are:

- to request access to your information;
- to request rectification of inaccurate or incomplete information;
- to request erasure of your information (a "right to be forgotten");
- to restrict the processing of your information in certain circumstances;
- to object to our use of your information, such as where we have considered such use to be necessary for our legitimate interests (e.g. in the case of direct marketing activities);
- where relevant, to request the portability of your information;
- where you have given consent to the processing of your data, to withdraw your consent; and
- to lodge a complaint with the competent supervisory authority.

## HOW TO CONTACT US

If you have any questions about this Privacy Notice or requests with regards to the personal data we hold about you, you may contact our Compliance Officer by email to [compliance@northwallcap.com](mailto:compliance@northwallcap.com) or by writing to 2 St James's Street, London, SW1A 1EF.



## COMPLAINING TO ICO

You have the right to complain to the Information Commissioner's Office (ICO). Further information is available from the ICO's website.

## RECORDING AND MONITORING OF COMMUNICATIONS

We may record and monitor telephone conversations and electronic communications with you for the purposes of:

- ascertaining the details of instructions given, the terms on which any transaction was executed or any other relevant circumstances;
- ensuring compliance with our regulatory obligations; or
- detecting and preventing the commission of financial crime.
- Copies of recordings will be stored for a period of five years, or such other longer period as we may determine from time to time.

## STEWARDSHIP CODE DISCLOSURE

Under the Financial Conduct Authority's ("FCA") Conduct of Business Rules 2.2A.5, North Wall is required to make a public disclosure on its website in relation to the nature of its commitment to the Financial Reporting Council's ("FRC") Stewardship Code.

The Code was first published by the FRC in July 2010 and it was updated in September 2012. Subsequently, the FRC published the new UK Stewardship Code 2020 ("2020 Code"), which took effect from 1 January 2020, and consists of 12 Principles for asset managers and asset owners, and six Principles for service providers.

The Code applies on a 'comply or explain' basis and is voluntary, aiming at enhancing the quality of engagement between institutional investors and companies, to help improve long-term returns to shareholders and provide for the efficient exercise of governance responsibilities by setting out good practice on engagement with investee companies that institutional investors should aspire to.

The FRC defines 'stewardship' as *'the responsible allocation, management and oversight of capital to create long-term value for clients and beneficiaries leading to sustainable benefits for the economy, the environment and society.'*

The 2020 Code Principles are:

- 1.** Signatories' purpose, investment beliefs, strategy, and culture enable stewardship that creates long-term value for clients and beneficiaries leading to sustainable benefits for the economy, the environment and society.
- 2.** Signatories' governance, resources and incentives support stewardship.
- 3.** Signatories manage conflicts of interest to put the best interests of clients and beneficiaries first
- 4.** Signatories identify and respond to market-wide and systemic risks to promote a well-functioning financial system.
- 5.** Signatories review their policies, assure their processes and assess the effectiveness of their activities.
- 6.** Signatories take account of client and beneficiary needs and communicate the activities and outcomes of their stewardship and investment to them.
- 7.** Signatories systematically integrate stewardship and investment, including material environmental, social and governance issues, and climate change, to fulfil their responsibilities.
- 8.** Signatories monitor and hold to account managers and/or service providers.
- 9.** Signatories engage with issuers to maintain or enhance the value of assets.
- 10.** Signatories, where necessary, participate in collaborative engagement to influence issuers.
- 11.** Signatories, where necessary, escalate stewardship activities to influence issuers.
- 12.** Signatories actively exercise their rights and responsibilities.



Whilst supporting the objectives underlying the Code and adhering to the highest standards of corporate governance and due diligence, the Firm having considered the 2020 Code, believes that the Principles are not applicable to its investment activities at this time. Should that change in the future, the Firm will review its commitment to the Code and update this disclosure accordingly. This disclosure will be reviewed at least annually. For any questions regarding this disclosure email [ian.lokkerbol@northwallcap.com](mailto:ian.lokkerbol@northwallcap.com).

Disclosure last updated: 10 July 2020

## **SHAREHOLDER RIGHTS DIRECTIVE II**

The Shareholder Rights Directive II (SRD II) is a European Union (EU) directive, and aims to encourage effective stewardship and long term decision making, involving transparency on engagement policies and investment strategies between traded companies and investors. SRD II applies to asset managers including MiFID investment Managers that invest in shares which are traded on a regulated market in the EEA as well as 'comparable' markets situated outside of the EEA.

The Firm does not trade regulated equities. As such, an engagement policy is not applicable to the investment strategies currently pursued.