

BLOOMWATER CAPITAL WEBSITE PRIVACY POLICY

This Privacy Policy explains what Bloomwater Capital Limited (“BWC”) does with two types of personal data:

1. Personal data you supply to the firm in circumstances where you apply for a job at the firm either directly or via a third-party recruiter.
2. Information you supply BWC and its Investor Relations team as a prospective investor. The policy describes how BWC collects, uses and processes your personal data, and how, in doing so, it complies with its legal obligations to you. Your privacy is important to BWC, and the firm is committed to protecting and safeguarding your data privacy rights.

The EU General Data Protection Regulation (Regulation (EU) 2016/679) (together with applicable implementing laws, “GDPR”) is applicable to the processing of personal data by BWC and various undertakings appointed by it. We may amend this Privacy Policy from time to time. Please visit this page if you want to stay up to date, as BWC will publish any changes here.

If you are dissatisfied with any aspect of BWC’s Privacy Policy, you may have legal rights and, where relevant, we have described these below. Identity and contact details of data controller:

Bloomwater Capital Limited
PO Box 71
Road Town
Tortola
VG1110 British Virgin Islands

Please contact a representative of BWC Compliance with any queries or concerns regarding the handling of your personal data: compliance@bloomwatercapital.com

What kind of personal data does BWC collect?

Candidate data:

In order to assess you for employment opportunities, BWC needs to process certain information about you. BWC only asks for details that will genuinely help to assist in this process, such as your name, age, gender, contact details, education details, employment history, emergency contacts, immigration status, financial information (where we need to carry out financial background checks) social security number as well as verbal and written references. Where appropriate and in accordance with local laws and requirements, we may also collect information related to your health and any criminal convictions.

Prospective investor data:

In order to provide you with information about BWC and its funds and associated investment opportunities it may be necessary for BWC to process certain personal information such as names, telephone numbers and email addresses and any personal identification documents you supply in order to confirm your identity.

How does BWC collect Personal Data?

BWC may collect personal data through a range of means. These may include:

- a) direct interactions (where you provide personal data to BWC through telephone or email correspondence or other direct methods of communication, including applications to invest in BWC's funds or for prospective employment);

- b) from third parties such as intermediaries and banks in the case of prospective investors or third-party recruitment firms in the case of prospective employees;
 - c) other publicly available sources (such as a website (for example, LinkedIn) or publicly-available registries (for example, FSC, FCA or other regulatory registers));
- and
- d) in the case of prospective candidates your personal referees may share personal information about you with BWC.

BWC does not collect information about you via its website or use cookies.

How does BWC use your personal data?

Candidate data:

Your personal details are used by BWC to help us (a) assess your suitability for roles that you have applied for either directly or via a recruiter (b) carry out background checks, verification and referencing on you as a candidate (c) to carry out BWC's obligations relating to any potential contracts entered into between BWC and you; and (d) to comply with legal or regulatory obligations applicable to BWC.

The provision and processing of your personal data is necessary for BWC in the context of your potential employment. Without the ability to process your personal data, BWC would not be able to assess you for employment at the firm and therefore

BWC has a legitimate interest in processing your personal data as part of its pre-employment screening.

Prospective investor data:

Information about prospective investors is used by BWC (a) for the purposes of discussing and reviewing potential investments in BWC funds (b) assessing an investor's appropriateness to investing the fund as an unregulated collective investment scheme (c) to carry out BWC's obligations relating to contracts to be entered into between BWC funds and you; (d) for the general administration of potential investments into the BWC funds; and (e) to comply with legal or regulatory obligations applicable to BWC.

In order to ensure BWC provides you with efficient investor relations service and access to information about BWC and its funds, BWC will store your personal data and/or the personal data of individual contacts at your organisation as well as keeping records of conversations, meetings and investor preferences. The provision and processing of your personal data is necessary for BWC in the context of your potential interest in the fund. Without the ability to process your personal data, BWC would not be able to assess you as suitable to invest in the fund and therefore BWC has a legitimate interest in processing your personal data as part of its investor screening activities.

Who does BWC share your personal data with?

Candidate data:

Your personal data will be shared internally with any of BWC's group companies for the purposes of candidate selection and appointment. Your personal data will also be shared with inter alia third-party suppliers who provide screening and testing services to the firm as well as legal, tax and HR advisers and third-party recruiters. If references are sought BWC will also share your personal data with previous employers and referees.

Prospective investor data:

BWC will share personal data on prospective investors with inter alia the fund boards, administrators to the funds, legal, tax and accounting advisers as well as third party financial intermediaries in certain instances. Personal data will only be disclosed by BWC to a third party in circumstances where that third party has agreed to respect the security of personal data and treat it in accordance with applicable law. Third parties to whom any personal data may be disclosed will be permitted to use personal data only.