
ONLINE PRIVACY STATEMENT - May 2019

At SyndicateRoom, we are committed to protecting and respecting your privacy. This policy (together with our [terms of use](#) and any other documents referred to on it) is meant to help you understand what data we collect, why we collect it, what we do with it, who we share it with and how we keep it secure.

Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it. It applies to the following:

1. Who we are
2. Contact us
3. Personal data
4. a. What personal information we collect when you use our services
- 4 b. Cookies and tracking
- 4 c. Job applicants and our current and former employees
5. Why does SyndicateRoom need to collect and store personal data?
6. Will SyndicateRoom share my personal data with anyone else?
7. How will SyndicateRoom use the personal data it collects about me?
8. What circumstances will SyndicateRoom contact me?
9. Can I find out the personal data that the organisation holds about me?
10. Making changes to your profile and deleting your account
11. Your rights as a data subject
12. Making a complaint

We review this policy regularly and may make changes to it. Please check this page occasionally to ensure that you're happy with any changes. Previous versions of our privacy policy can be accessed from this page.

Privacy statement

1. WHO WE ARE

The data controller is SyndicateRoom Group Ltd, comprised of Syndicate Room Ltd and Syndicate Room Nominees Ltd. SyndicateRoom is registered as Syndicate Room Ltd and

regulated by the Financial Conduct Authority (FCA). For ease of reading, 'SyndicateRoom' will be used to describe Syndicate Room Ltd and Syndicate Room Nominees Ltd in this privacy statement.

SyndicateRoom is an online investment platform. SyndicateRoom members have access to private seed rounds, SyndicateRoom EIS funds, Initial Public Offerings (IPOs), with SEIS, EIS, growth and pre-IPO rounds. Entrepreneurs can host private rounds via the SyndicateRoom platform.

2. CONTACT US

In writing: SyndicateRoom, The Pitt Building, Trumpington Street, Cambridge, CB2 1RP

By phone: 01223 478558

Questions, comments and requests for further information regarding this privacy statement are welcomed, and should be addressed to our Data Protection Officer: dataprotection@syndicateroom.com

3. PERSONAL DATA

Under the EU's General Data Protection Regulation (GDPR) personal data is defined as: "any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person".

4.A. WHAT PERSONAL INFORMATION WE COLLECT WHEN YOU USE OUR SERVICES

This applies to:

- Visitors to our website
- Registering as an everyday investor
- Self-certifying as a sophisticated or high-net-worth investor
- Making an investment into a private market opportunity, public market deal or EIS fund offered by SyndicateRoom

- Applying as an entrepreneur to host a funding round via SyndicateRoom

We collect:

- Information that you provide by filling in forms on our site. This includes personal data provided at the time of registering to use our site, subscribing to our service, posting material or requesting further services or information
- Details of transactions you carry out through our site and of the fulfilment of your orders

We may contact you for further information if you report a problem with our site, in order to try and solve the problem you have raised.

We may ask you to complete surveys that we use for research purposes, although you do not have to respond to them. If you do participate in these, and we collect personal data as part of the survey, we will notify you of how your data will be used via a privacy notice at the time that we invite you to take part.

4.B. COOKIES AND TRACKING

A cookie is an identifier (a small file of letters and numbers) that is sent to your device. You can learn more about cookies by visiting <http://www.allaboutcookies.org>

We use cookies to improve our service, increase the performance of our website, and deliver the essential functionality of our website - such as logging in to your account.

Our website's functionality will be limited if you configure your browser to block cookies.

We also use cookies to:

- Analyse visits and user behaviour across pages on our website. Any personal data collected, including IP addresses, will be anonymised
- Measure the effectiveness of our online advertising campaigns

- Provide tailored marketing messages to our visitors through re-targeting

You can block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our site.

For more information about how to control and disable cookies visit

<https://cookies.insites.com/disable-cookies/>

You can find information about the cookies that we use, and why we use them, in the table below. By continuing to use our website, we assume that you consent to the use of these cookies.

Cookie Name	Cookie Purpose	Find out more
Google Analytics	We use this to measure visits and track behaviour across pages on our site, to help us make improvements to our website. Any personal data collected including IP addresses will be anonymised.	Read more about Google Analytics and cookies .
Customer.io	We use this to measure visits and track behaviour across our website. We also gather behavioural statistics around email open rates and click throughs.	Read more about Customer.io and cookies .
Google Ads Tag	We use this to measure the effectiveness of our Google Ads advertising campaigns, and re-target users on Google Search, Google Display Network, and YouTube.	Read more about Google Ads Tag and cookies .
(Microsoft) Bing Universal Event Tag	We use this to measure the effectiveness of our Microsoft Advertising campaigns, and re-target users on Bing Search.	Read more about Bing Universal Event Tag and cookies .
LinkedIn Insight Tag	We we use this to measure the effectiveness of our LinkedIn advertising campaigns, and re-target users on LinkedIn.	Read more about LinkedIn Insight Tag and cookies .

Facebook Pixel	We use this to measure the effectiveness of our Facebook advertising campaigns, and re-target users on Facebook.	Read more about Facebook Pixel and cookies .
Twitter Universal Website Tag	We use this to measure the effectiveness of our Twitter advertising campaigns, and re-target users on Twitter.	Read more about Twitter Universal Website Tag and cookies .

Links to other websites

This privacy policy does not cover the links within this site linking to other websites. We encourage you to read the privacy statements on the other websites you visit.

4.C. JOB APPLICANTS AND OUR CURRENT AND FORMER EMPLOYEES

- All of the information you provide during the recruitment process will only be used for the purpose of progressing your application, or to fulfil legal or regulatory requirements if necessary.
- We will not share any of the information you provide during the recruitment process with any third-parties for marketing purposes.
- We use third-party recruitment processors to post job applications and process applications via their websites/platforms. We encourage you to read the privacy statements of third-party processors before submitting personal information.
- We use a third-party CRM system and cloud-based storage system to process your personal data only for the purpose of progressing your application. The information you provide will be held securely by us and/or our data processors, whether the information is in electronic or physical format.
- We will use the contact details you provide to us to contact you to progress your application. We will use the other information you provide to assess your suitability for the role you have applied for.
- We do not collect more information than we need to fulfil our stated purposes and will not retain it for longer than is necessary.
- For current employees, we will process personal data to fulfil our contractual and legal obligations as an employer. Details of the personal data we collect, process, store and delete will be included in your employment contract.
- In terms of former employees, we are legally obliged to store personal data for tax obligations and will store the minimum required to meet this obligation.

If you have any queries about the recruitment process or how we handle your information, please contact us at recruitment@syndicateroom.com.

5. WHY DOES SYNDICATEROOM NEED TO COLLECT AND STORE PERSONAL DATA?

In order for us to provide SyndicateRoom members with access to investment opportunities, and entrepreneurs with the ability to apply to raise funds via the SyndicateRoom platform, we need to collect personal data for correspondence and contractual purposes – specifically when making financial transactions and listing opportunities on the platform. More details can be found in [Part 4.a](#)

We are committed to ensuring that the information we collect and use is appropriate for this purpose and does not constitute an invasion of your privacy.

6. WILL SYNDICATEROOM SHARE MY PERSONAL DATA WITH ANYONE ELSE?

We do not share data with third party marketers. We are required to share data with third party providers who we engage with to fulfil contractual obligations you have agreed to, such as investing in an opportunity, where ID and AML checks will need to be performed.

Any third parties that we may share your data with are obliged to keep your details securely, and to use them only to fulfil the service they provide. When they no longer need your data to fulfil this service, they are obliged to dispose of the details in line with SyndicateRoom's procedures. If we wish to pass any sensitive personal data onto a third party, we will only do so once we have obtained your explicit consent, unless we are legally required to do so otherwise.

7. HOW WILL SYNDICATEROOM USE THE PERSONAL DATA IT COLLECTS ABOUT ME?

SyndicateRoom will process (collect, store, use, and delete) the information you provide in a manner compatible with the EU's General Data Protection Regulation (GDPR). We will endeavour to keep your information accurate and up to date, and not keep it for longer than is necessary.

SyndicateRoom is legally required to hold some types of information to fulfil our statutory obligations for tax reporting, contractual agreements and audit purposes. How long certain kinds of personal data should be kept may also be governed by specific business-sector requirements and agreed practices. For example, under FCA guidelines, records of investments should be kept for 5 years following the end of a relationship between investor and company.

We review our retention periods for personal information on a regular basis. We will hold your personal information for as long as is necessary for the relevant activity, or as long as is set out in any relevant contract you hold with us.

Personal data may be held in addition to these periods depending on individual business needs. If you contact us by email, telephone or in writing, we may keep a record of that correspondence until it is no longer needed for the purpose it was collected for.

8. WHAT CIRCUMSTANCES WILL SYNDICATEROOM CONTACT ME?

Our aim is not to be intrusive, and we undertake not to ask irrelevant or unnecessary questions. Moreover, the information you provide will be subject to rigorous measures and procedures to minimise the risk of unauthorised access or disclosure.

If you choose to invest in a private market opportunity through the SyndicateRoom platform, we will contact you by email with important information about your investment(s).

If you have opted-in to receive marketing communications such as our investor newsletter, and emails about updates, events and surveys, we will contact you for the purposes described, and you are able to manage your subscription preferences and unsubscribe at any time. If you have opted-in to additional website activity tracking to include Act-On and Customer.io (see [Part 4.b](#)), we have a legitimate interest to contact you about investment opportunities you have viewed or are following.

If you are an entrepreneur, and have applied to raise funds, or have previously raised funds via SyndicateRoom, we will contact you by email with important information about your funding round(s). As a legitimate interest, we will contact you with our company newsletter which includes updates on our company portfolio and SyndicateRoom products and events. We will only contact you for the purposes described, and you are able to manage your subscription preferences and unsubscribe at any time.

If you are an investor in our EIS funds, please refer to the relevant EIS funds Investment Memorandum for details of how your personal details will be processed for legitimate interest and contractual purposes.

9. CAN I FIND OUT THE PERSONAL DATA THAT THE ORGANISATION HOLDS ABOUT ME?

At your request, SyndicateRoom can confirm what information we hold about you and how it is processed. If SyndicateRoom does hold personal data about you, you can request the following information:

- Identity and the contact details of the person or organisation that has determined how and why to process your data.
- Contact details of the Data Protection Officer, where applicable.
- The purpose of the processing as well as the legal basis for processing.
- If the processing is based on the legitimate interests of SyndicateRoom or a third party, and information about those interests.
- The categories of personal data collected, stored and processed.
- Recipient(s) or categories of recipients that the data is/will be disclosed to.
- If we intend to transfer the personal data to a third country or international organisation, information about how we ensure this is done securely. The EU has approved sending personal data to some countries because they meet a minimum standard of data protection.
- How long the data will be stored.
- Details of your rights to correct, erase, restrict or object to processing.
- Information about your right to withdraw consent at any time.
- How to lodge a complaint with the supervisory authority.
- Whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether you are obliged to provide the personal data and the possible consequences of failing to provide such data.
- The source of personal data if it wasn't collected directly from you.
- Any details and information of automated decision making, such as profiling, and any meaningful information about the logic involved, as well as the significance and expected consequences of such processing.

All requests must be made in writing, either by letter or email using the contact details in [Part 2](#).

10. MAKING CHANGES TO YOUR PROFILE AND DELETING YOUR ACCOUNT

To make changes to personal details in your profile, please contact us via team@syndicatoroom.com or in writing using the contact details in [Part 2](#). Requests will be processed internally, as we need to ensure record of the change has been made. We

will communicate with you about progress to your request and inform you once the change has been made.

Requests to delete your account should be made via team@syndicatoroom.com or in writing using the contact details in [Part 2](#). Requests will be processed internally, as we need to ensure record of deletion has been made.

If you have made an investment via the SyndicateRoom platform, it may not be possible to delete your account at the time of request as we are obliged to keep your contact details for contractual reasons and tax purposes. We will communicate with you about the status and outcome of your request.

11. YOUR RIGHTS AS A DATA SUBJECT

At any point while we are in possession of or processing your personal data, you, the data subject, have the following rights:

- Right of access – you have the right to request a copy of the information that we hold about you.
- Right of rectification – you have a right to correct data that we hold about you that is inaccurate or incomplete. Due to ID and AML checks, requests to change personal data should be made in writing using contact details in [Part 2](#).
- Right to be forgotten – in certain circumstances you can ask for the data we hold about you to be erased from our records.
- Right to restriction of processing – where certain conditions apply to have a right to restrict the processing.
- Right of portability – you have the right to have the data we hold about you transferred to another organisation.
- Right to object – you have the right to object to certain types of processing such as direct marketing.
- Right to object to automated processing, including profiling – you also have the right to be subject to the legal effects of automated processing or profiling.
- Right to judicial review: in the event that SyndicateRoom refuses your request under rights of access, we will provide you with a reason as to why. You have the right to complain as outlined in [Part 12](#).

All of the above requests will be forwarded on should there be a third party involved (as stated in [Part 6 above](#)) in the processing of your personal data.

You can download the SAR (Subject Access Request) form [here](#) and return it to dataprotection@syndicateroom.com.

Additionally, if, for any reason, we believe that your personal data has been unlawfully disclosed by ourselves or a third party processor whose services we use, and we consider the breach to have a high impact or high potential impact to your rights and freedoms, we will endeavour to contact you by all reasonable steps using the contact details we have on record, or make a public announcement if applicable.

12. HOW DO I MAKE A COMPLAINT?

We encourage you to inform us of any complaints you have so that we can correct them quickly. Send complaints or concerns to dataprotection@syndicateroom.com.

In the event that you wish to make a complaint about how your personal data is being processed by SyndicateRoom or third parties, or how your complaint has been handled, you have the right to lodge a complaint directly with the [Information Commissioner's Office](#).