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PRIVACY NOTICE

We at Oakcean Capital are committed to respecting your privacy and protecting your personal data. This Privacy Notice will inform you as to how we look after your personal data when you visit our website, www.oakceancapital.com, and any of its sub-domains (the “Website”), regardless of where you visit from and in the interactions we may have after your visit, and tell you about your privacy rights and how the law protects you.

This Privacy Notice should be read alongside, and in addition to, our [Terms and Conditions of Use](#), which can be found at [T&C](#).

1. Important Information and Who We Are

PURPOSE OF THIS PRIVACY NOTICE

This Privacy Notice aims to give you information on how Oakcean Capital collects and processes your personal data through your use of this Website, [including any data you may provide through this Website when you sign up to our newsletter].

This Website is not intended for children, and we do not knowingly collect data relating to children.

CONTROLLER

In this Privacy Notice, references to “Oakcean Capital”, “we”, “us” or “our” are referring to Oakcean Capital Limited, a limited liability company registered in England and Wales (company number 14074366) whose registered address is C/O Mercer & Hole LLP, 21 Lombard Street, London, EC3V 9AH, United Kingdom. For purposes of the applicable data protection laws, Oakcean Capital is the “data controller”. This means that Oakcean Capital determines the purposes for which, and the manner in which, your personal data is processed.

Oakcean Capital currently has no regulatory obligation in the UK to appoint a data protection officer. We have, however, dedicated a responsible officer who may be reached at info@oakceancapital.com if you have any questions about this Privacy Notice, including any requests to exercise your legal rights.



CHANGES TO THE PRIVACY NOTICE AND YOUR DUTY TO INFORM US OF CHANGES

This version was updated in January 2023. Any changes to this Privacy Notice will be posted on this Website and will be effective on posting.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

THIRD-PARTY LINKS

This Website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our Website, we encourage you to read the privacy notice of every website you visit.

2. The Data We Collect About You

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, control, process, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity data** such as your name, your employer, your title or position and your relationship to a person or information collected by us as part of our business acceptance processes.
- **Contact data** such as your postal address, billing address, email address and telephone numbers.
- **Financial data** such as bank account details.



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- **Technical data** such as information from your visit to our Website, or in relation to materials and communications we send to you electronically, including your IP address.
- **Marketing and communications data** such as your preferences in receiving marketing from us, your communication preferences and information you provide to us for the purposes of attending meetings and events, including access and dietary requirements.
- **Personal information** provided to us by or on behalf of our clients, partners and employees or generated by us in the course of providing services and employment including applications for employment submitted to us.

Certain personal data may be sensitive and nature and may include special categories of data (e.g., when undertaking “know your customer” or anti-money checks).

We also collect, use and share aggregated data such as statistical or demographic data for any purpose (e.g., calculation of percentage users accessing a specific Website feature). Aggregated data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. However, if we combine or connect aggregated data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this Privacy Notice.

3. How Your Personal Data Is Collected

We use different methods to collect data from and about you including through:

- **Direct interactions** including when you or your organisation seek advice, services or employment from us, or when you or your organisation offer or provide services to us as a vendor.
- **Automated technologies or interactions** such as when you visit, or interact with, our Website or you email us or provide data in respect of attending Oakcean Capital events or send an application for a position with us. In respect



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of our collection of personal data using cookies please see our [Cookie Policy](#) for further details.

- **Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources including identity and contact data from publicly available sources such as Companies House, Dow Jones and World Check.

4. How We Use Your Personal Data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract, we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

Generally, we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third-party direct marketing communications to you via email or text message.

PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA

We have set out below a description of the principal ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data.



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Purpose / activity	Lawful basis for processing including basis of legitimate interest
To register you as a new client	Performance of a contract with you
To process and deliver our services to you	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)
To manage our relationship with you which will include notifying you about changes to our terms or Privacy Notice	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation
To administer and protect our business and this Website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To deliver relevant Website content to you and measure or understand the effectiveness of such content we serve to you	Necessary for our legitimate interests (to study how clients use our products/services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our Website, products/services, marketing, client relationships and experiences	Necessary for our legitimate interests (to define types of clients for our services, to keep our Website updated and relevant, to develop our business and to inform our marketing strategy)
To analyse your application in respect of a position at Oakcean Capital	Necessary for our legitimate interests (to respond to an application)

MARKETING

We strive to provide you with choices regarding certain personal data uses, particularly around marketing. We may use certain of your personal data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which services may be relevant for you.

You will receive marketing communications from us if you have requested information from us or if you have engaged us to provide services to you and, in each case, you have not opted out of receiving that marketing.



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You can ask us to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by contacting us at info@oakceancapital.com.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us during the course of a transaction or us providing services to you.



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COOKIES

You can set your browser to refuse all or some browser cookies, or to alert you when Websites set or access cookies. If you disable or refuse cookies, please note that some parts of this Website may become inaccessible or not function properly. For more information about the cookies we use, please see our [Cookie Policy](#).

CHANGE OF PURPOSE

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

5. Sharing Your Personal Data with Third Parties

We may disclose personal data to the Financial Conduct Authority (“FCA”), HM Revenue & Customs, Information Commissioner’s Office (“ICO”) and any other regulators and other authorities who require reporting or disclosure of processing activities, or other personal data, in certain circumstances.

We may share your data with third parties to whom we have outsourced certain tasks, such as IT, business administration or marketing and analytics services.

We may share your personal data with our insurers, our professional advisors (lawyers, bankers, auditors, corporate financiers and brokers) in connection with services they provide to us.

We may also share data with third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this Privacy Notice.



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We require all third parties to respect the security of personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

We will not otherwise share personal information with any third party except where we are permitted to under data protection laws or required to by law.

6. International Transfers

We may hold copies of your personal data and other data on computers outside the European Economic Area (“EEA”). Sometimes we will share personal data with third parties outside the EEA. If we do this, we will comply with the rules in the General Data Protection Regulation.

Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission. For further details, see [European Commission: Adequacy of the protection of personal data in non-EU countries](#)
- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe (called the “EU Model Clauses”).
- Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US. If the provider is not EU-US Privacy Shield certified, we may use the EU Model Clauses.

7. Data Security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or



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disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

8. Data Retention

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

9. Your Legal Rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. You have the right to:

- **Request access to your personal data** (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Request correction of the personal data that we hold about you.** This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- **Request erasure of your personal data.** This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to



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process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

- **Object to processing of your personal data.** This enables you to object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- **Request restriction of processing of your personal data.** This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- **Request the transfer of your personal data to you or to a third party.** We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- **Withdraw consent at any time where we are relying on consent to process your personal data.** However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

We cannot advise you in connection with our use of your personal data. If you need legal advice on this subject, then you will need to consult independent advice.



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You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally, it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you.

10. Supervisory authority

In the UK, we are supervised by the ICO (Information Commissioner's Office). You can find out more about the ICO through its website: www.ico.org.uk.

We would be happy to answer your questions and address your concerns regarding our use of your data. Please email us at info@oakceancapital.com. Please also use that address for any requests to exercise your legal rights or if you have a complaint.

Alternatively, you can make a complaint to the ICO at any time, but we prefer you to contact us first. We should be able to resolve the matter quickly and to your satisfaction.