

# Privacy Policy

## Who Are We

This privacy policy applies to the website [www.firstnovacapital.co.uk](http://www.firstnovacapital.co.uk) which is owned and operated by First Nova Capital Limited ("First Nova Capital" "we", "us") and we are committed to protecting and respecting your privacy.

This privacy policy describes how First Nova Capital collects and uses the personal data you provide. It also describes the choices available to you regarding our use of your personal data and how you can access and update this information (see "Your rights" section for more details).

Please ensure that you read this policy in full before providing us with any personal data.

## Personal Information We May Collect From You

We may collect the following personal information from you when you contact us requesting services or information from us. We need to collect this information so that we can provide our services or that information to you:

- Information that you provide to us by filling in forms on our site ("Our Site"). This includes contact information such as name, email address, mailing address, phone number, financial information such as bank or brokerage account numbers, unique identifiers such as username, account number, password, date of birth and preferences information such as favourites lists, transaction history, marketing preferences.
- If you chose to list your company with us, we may ask for information about your business such as company name, company size, business type and personal data such as a professional profile.
- Information that you provide to us when you write to us (including by email).
- Information that you provide to us when we speak to you by telephone. We may make and keep a record of the information you share with us.
- Information that you provide to us by completing surveys.
- Details of transactions you carry out through Our Site and of the fulfilment of your orders.
- Information obtained by us from third parties in accordance with this Privacy Policy. For example, if you chose to list your business with us, we may obtain additional information from credit reference agencies as a supplementary source.

As is true of most web sites, we gather certain information automatically and store it in log files. This information includes internet protocol (IP) addresses, browser type, internet service provider (ISP), referring/exit pages, operating system, date/time stamp, and clickstream data. We use this information, to analyse trends, to administer Our Site, to track users' movements around Our Site and to gather demographic information about our user base as a whole.

## Cookie Policy

In addition to personal information, we may collect information about you automatically when you visit the Site.

The collection of information may involve the use of cookies and web beacons. A web beacon is a small graphic image placed on a web page that is designed to allow us to monitor traffic on the Site. A cookie is a small text file that is placed on your computer's hard drive by your web browser when you first visit the Site. The cookie allows us to identify your computer and find out details about your last visit.

Most internet browsers accept cookies automatically, but usually you can alter the settings of your browser to erase cookies or prevent automatic acceptance if you prefer. If you choose not to receive our cookies, we cannot guarantee that your experience with the Site will be as quick or responsive as if you do receive cookies.

The information collected by cookies and web beacons is not personally identifiable, it includes general information about your computer settings, your connection to the internet e.g. operating system and platform, IP address, your browsing patterns and timings of browsing on the Site and geographical location.

### **Use of Your Information**

By using our website, you agree that we may collect, hold, process and use your information (including personal information) for the purpose of providing you with our services and developing our business which includes:

- personalisation of content, business information or user experience
- account set up and administration
- delivering marketing and events communication
- carrying out polls and surveys
- internal research and development purposes
- providing goods and services
- legal obligations (e.g. prevention of fraud)
- meeting internal audit requirements

### **Legal basis for processing your personal data**

The relevant processing conditions contained within the General Data Protection Regulation (GDPR) are as follows:

- consent
- contract
- legitimate interests
- vital interests
- public task
- legal obligation

The only grounds that are likely to apply to our processing will be that of contact. This is due to the fact that our relationship with our clients will be formed on the basis of a contract for our services. We may also rely on consent, but this will only be if you opt into marketing from us or contact us to enquire about our services. Should you wish to opt out of any marketing from us if you have previously consented to it please email [admin@firstnovacapital.co.uk](mailto:admin@firstnovacapital.co.uk) and make this intent clear. We will not process special category personal data.

### **Specific Requirements**

Please note that certain categories of information are mandatory in order for us to provide you with information about our products and also to register for an Investment account with Northern Provident Investments Limited's Platform in order to invest in our bond.

Northern Provident Investments Limited will need to collect and process personal information to enable you to register for an Investment account and to update you on any information on your

account. Further information will be required if you are investing into our bond through an IFISA with Northern Provident Investments Limited who will be the ISA Manager.

If you are investing either via an ISA or directly Northern Provident Investments Limited will also need to process your personal data in order to undertake AML checks and facilitate your investment in the First Nova Capital bond.

By registering for an Investment account you consent to Northern Provident Investments Limited collecting and processing this personal data as described above. By requesting to see our products you consent to Northern Provident Investments Limited collecting and processing your personal data in respect of your investor classification and assessment.

### **Sharing Your Personal Information**

We will treat personal data confidentially and except so far as is necessary in order to provide our services to you, we will not share your information with any third party unless you provide us with your specific permission.

Should we need to share data with third parties in order to provide our services this will be done securely through passworded files either via email. The specific parties in question will only be relevant to the services we are providing; these may include the following:

- Client Account Provider
- Other outsources services e.g. IT or Platform hosting firms
- The bond issuer (if you are an investor with that firm)

### **Safeguards And Security**

No data transmission over the internet can be entirely secure, so we do not guarantee the security of your personal information and/or use of our website. However, we use reasonable endeavours to protect the security of your personal information from unauthorised access or use by using encryption technology.

In addition to these safeguards, your personal information is protected in the UK by the Data Protection Act 2018. This provides that the information which we hold about you should be processed fairly and lawfully, should be accurate, relevant and not excessive, not be retained for longer than is necessary and, if applicable, be kept up to date.

For more information on the Data Protection Act 2018 and your related rights please see [www.ico.gov.uk](http://www.ico.gov.uk).

### **How long do we keep your personal data for?**

We will never hold your data for longer than is reasonably necessary. Should you enter into a contract with us we will remove your data six years after our service to you ends.

If we have obtained your details only as a result of your consent and we are relying on this as a processing condition we will remove your data within one year of you supplying this to us (unless you have subsequently reconfirmed your opt in to us).

Personal data will be securely disposed after we no longer need it. In the case of electronic copies these will be deleted. For hard copy personal data this will be securely shredded.

### **Accessing Your Personal Information Your rights in relation to personal data**

Under GDPR, you have rights in relation to access and control of your personal data. Specifically:

- access
- correction and deletion
- withdrawal of consent (if we are processing data on condition of consent)
- data portability
- restriction of processing and objection
- lodging a complaint with the Information Commissioner's Office

If you wish to undertake any of the above in relation to the personal data, we hold about you, or have any other queries please write to us (including full details of your request) at the address below. We may charge a small administration fee in relation to fulfilling a request for access to your information.

Should you submit a request for access to the data we hold on you (a DSAR) we will respond to you within 40 days of receipt of the request. If the request does not provide enough information to identify you we may require further information. Where further information and/or payment of the fee is requested, the deadline is extended to 40 days from them being received. When we receive a DSAR from you we will write to you to:

- confirm receipt of the DSAR, and
- indicate when you are likely to respond, taking into account the 40 day time limit.

Please be aware that there may be circumstances in which data subject rights may be limited, e.g. if fulfilling the data subject request may expose personal data about another person, or if you ask us to delete data which we are required to keep by law.

### **How to contact us?**

Should you wish to contact us with questions or concerns about our privacy practices, your personal information, or if you wish to file a complaint you can contact us via the following methods:

Email: [admin@firstnovacapital.co.uk](mailto:admin@firstnovacapital.co.uk)

Phone: 0207 965 7355

Address: First Nova Capital Limited, 166 York Road Market Weighton York YO43 3EF

### **Monitoring**

This policy will be reviewed (and updated where necessary) as and when the relevant data protection rules are amended.