

## Maven Income and Growth VCT 4 PLC – Data Protection Policy

Issue date: January 2023

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### 1.0 Purpose

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Maven Income and Growth VCT 4 PLC is referred to as the “Company” “we” or “us” in this policy.

This Policy sets out how we collect, use and protect your personal information that is processed by anyone on behalf of Maven Income and Growth VCT 4 PLC. ‘Personal data’ is information that identifies you or another person, or which is capable of doing so.

The use of all personal data processed by the Company is governed by; the UK General Data Protection Regulation (UK GDPR), the UK Data Protection Act 2018 (DPA) and the Privacy and Electronic Communications Regulations (PECR).

All activities regarding data protection are regulated by the Information Commissioner’s Office (ICO) and the Financial Conduct Authority (FCA).

The Company is the data controller. Data processing is carried out by third parties, in particular; Maven Capital Partners UK LLP (Maven) as the Investment Manager and Company Secretary, The City Partnership (UK) Limited as the Receiving Agent and The City Partnership (UK) Limited as Registrars.

### 2.0 Personal Data

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We ensure that there are appropriate oversight and control arrangements in place for the processing of personal data in accordance with accepted principles of good information handling and in accordance with UK General Data Protection Regulation (UK GDPR).

#### What information we hold about you

The information collected on application forms, which includes personal details, bank account details, and, where relevant, identity details, information about source of funds and details of any financial advisor that are used to process the application. Where this is accepted, the information provided is used to allot shares and to issue share certificates.

We do not retain your personal data. If shares are allotted to you, the Registrar will retain share registers on behalf of the Company, as is required by law. These registers will contain your personal and contact details and information about your shareholding.



## **How we use the information about you**

All personal information will only be used for the purposes detailed at the point of initial collection and to respond to queries following initial contact.

Your personal data will be shared with the above-mentioned Investment Manager and Secretary and the Receiving Agent and Registrar. Personal data may also be disclosed to a regulator where required to do so, for example HMRC or the Financial Conduct Authority. In each of these cases, your information is only shared as strictly necessary to provide you with legally required shareholder services and to meet legal obligations. Further, to the extent that it is required by law, your information will be used to send you routine shareholder communications (including the issue of Annual or Interim Reports, Circulars and notices of shareholder meetings, or notifications of their publication). Where you have indicated that you are happy for Maven to send you information about other Maven VCTs or other of their investment products and services, your information is shared with Maven so that they can contact you for these purposes.

Maven and The City Partnership (UK) Limited may also need to share your information with other third parties. For example, they may need to share your information with credit reference agencies to check your identity and to make other financial crime checks. Where you apply for new shares through a financial intermediary or buy shares in the secondary market through a broker, your information may also be shared with other third parties in order to assist with the processing of your application or purchase.

## **How we store your data**

We do not retain your personal data. All records are held and maintained by our outsourced providers. Assurances are obtained from all outsourced providers that their security measures meet the requirements in line with the guidance, to prevent any personal data from being lost, used or accessed in an unauthorised way, altered or disclosed.

There are a number of regulatory obligations in place that require specific timeframes for keeping data. Where these apply, they are detailed in the Data Retention Policy of the relevant outsourced service provider.

## **Marketing**

The Company is governed by the ePrivacy Regulation, which prevents unsolicited direct marketing.

We ensure that, when data has been provided to us by third parties, the individuals concerned have consented to being contacted by them. If marketing messages are sent out via email, an opt-out option from future marketing communications will be provided. Contact details will be retained for as long as we have consent to send marketing information.

The Company is required by legislation to send you copies of Annual and Half-Year Reports (either electronically or by post), and other shareholder circulars and communications, such as notices of general meetings. These documents are not deemed to be marketing material.

## Your rights

Data subjects have rights in relation to the way we handle their personal data. These include the following rights:

- a) access a copy of the information comprised in their personal data;
- b) rectification;
- c) erasure ('right to be forgotten');
- d) restriction of processing;
- e) data portability;
- f) objection to processing; and
- g) complain to the ICO and to take court action for breaches.

It is important that the personal information we hold is accurate and current. Requests for the exercise of any of the above rights must be sent to the Compliance Partner of Maven.

## Data breaches

GDPR requires that all breaches are recorded in a Breaches Register, the breaches register for the Company is maintained by the Compliance Partner of Maven.

If there is any breach or any personal data is compromised, the Maven Compliance Partner will assess this to decide whether a notification to the ICO or to data subjects is required, this will be completed within 72 hours after being made aware of the breach. All evidence relating to personal data breaches will be retained to enable a record of such breaches to be maintained in line with GDPR requirements.

## Cookies

The Maven website uses cookies. Cookies are small files saved to the user's computer's hard drive that track, save and store information about the user's interactions and usage of the website. This allows the website, through its server, to provide the users with a tailored experience within the website. We may use cookies to remember personal settings you have chosen at our website. In no other context do we use cookies to collect information that identifies you personally. We use anonymous session cookies (short-term cookies that disappear when you close your browser) to help you navigate the website and make the most of the features.

## Other websites

The website [www.mavencp.com](http://www.mavencp.com) may contain links to other websites. This privacy policy only applies to the Maven website. When you link to other websites you should read their own privacy policies.

## Changes to our privacy policy

We keep our privacy policy under regular review, and we will place any changes on the Maven website. This privacy policy was last updated in January 2023.

## 3.0 Contacts

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### Contact us

If you have any questions about the Company's Data Protection Policy, the data we hold on you, or you would like to exercise one of your data protection rights, please do not hesitate to contact;

Claire Speirs, Compliance Director, Maven Capital Partners UK LLP, Kintyre House, 205 West George Street, Glasgow, G2 2LW. Telephone: 0141 306 7400 Email: [enquiries@mavencp.com](mailto:enquiries@mavencp.com).

### Contact the ICO

If you believe The Company has not responded to your requests appropriately you can contact the office of the ICO on 0303 123 113.