



Natrium Capital Limited

Privacy Notice

Last updated 24 May 2018

This privacy notice details Natrium Capital Limited's privacy policy relating to personal information that we collect, create, use and share when you are using our services, including any data you may provide when you access our website or sign up for our Chemical Reactions publications. It explains what personal data we hold, what we do with that data and how long we keep it for. Your privacy is important to us, and we are committed to protecting and safeguarding your data privacy rights.

The Natrium Capital Limited website is not intended for children and we do not knowingly collect data relating to children.

Last update

This privacy notice was last updated on 24 May 2018.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them. We will update this Notice from time to time and you should review it whenever you visit the website or before providing us with any personal data about yourself.

Introduction

We are committed to respecting the confidentiality of the personal information you supply to us and all data will be processed in accordance with applicable data privacy laws. You have the right to be provided with clear, transparent and easily understandable information about how we use your information and your rights. This is why we are providing you with the information in this Privacy Notice.

If you do not agree with our use of your personal data as set out in this Privacy Notice, you should not submit your personal information to us. However, if you do not wish to submit your personal information, or if you wish to exercise your rights to prevent us using your data, you should be aware that we may not be able to do business with you.

This notice only applies to individuals within the European Union.

Who we are

We are Natrium Capital Limited, a limited liability company registered in England and Wales, with registration number 07948053. Our Registered Address is 1 Devonshire Street, London W1W 5DR. Natrium Capital is a corporate finance boutique specialising in the chemicals and adhesives, materials, paints and coatings, biotechnology and clean technology industries. Natrium Capital offers high level strategic and M&A (mergers and acquisitions) execution advice and has extensive experience in investment banking and corporate finance. Natrium Capital is currently working with a number of clients worldwide.

We are affiliated with certain other entities and so when we mention “Natrium Capital Limited”, “Natrium Capital” or “Natrium”, “we”, “us” or “our” in this privacy notice, we are referring to Natrium Capital Limited or the relevant affiliate. Natrium Capital Limited is the controller and responsible for this website.

How we collect your personal data

We will only collect and use your personal data where we have legitimate business reasons to do so. We may obtain personal data from you to provide you a service or when we provide a service to one of our clients, when you contact us or visit our offices, including when you call us, get in touch with us via our website, or when you or your organisation correspond with us using any means of communication. This includes personal data provided to us:

- in regard to services we provide;
- if you deal with us when we are providing services to one of our clients;
- when you provide our staff with business cards or contact details;
- when you contact us with a question or enquiry via our website or by calling our office;
- when we receive referrals from other employees, clients or suppliers;
- when you have posted information on websites or other publicly available places;
- when you deal with us in order to provide us with goods or services;
- from third parties when conducting compliance checks;
- when you contact us about employment with Natrium Capital;
- when staff give us your details as an emergency contact;
- when candidates give us your details as a referee; or
- when you make a complaint.

The personal data we collect

We collect personal data in order to provide the best possible service we can or to maintain good relationships. We only collect the data we need and we will ensure we have appropriate physical and technological security measures to protect your personal data.

For clients using our services or suppliers whose services we use, depending on the relevant circumstances and applicable local laws and requirements, we may collect some or all of the following information: name, title, your employer, position, email address, postal address, telephone numbers and other contact numbers, gender, nationality, country of birth, place of birth, proof of identification, passport details, bank details and proof of address. We may also hold extra information that someone in your organisation has chosen to tell us, where we have a good reason to hold it.

We may also collect technical data such as information from your visit to our website or in relation to materials that we send you.

For employees or candidates applying for a job with Natrium Capital, depending on the relevant circumstances and applicable local laws and requirements, we may collect some or all of the following information: name, title, date of birth, gender, marital status, photograph, email address, postal address, telephone numbers, education details, employment history, emergency contacts and details of any dependants, referee details, immigration/visa status (whether or not you need a work permit), nationality/citizenship/place of birth, a copy of your driving licence and/or passport/identity card, financial information (where we need to carry out financial background checks), social security number (or equivalent in your country) and any other tax-related information, diversity information possibly including racial or ethnic origin, religious or other similar beliefs, and physical or mental health, including disability-related information, details of any criminal convictions if this is required for a role that you are interested in applying for, details about your current remuneration, pensions and benefits arrangements, information on your interests, needs regarding future employment and any extra information that you or your referees choose to tell us. We may also hold information about interviews you have attended and any relevant feedback and information gained from appraisals. We may also hold limited health information where you have made us aware or where you have told us to justify an absence.

How we use your information

Natrium Capital collects and processes your personal data for legitimate Business Management and Human Resource purposes. This may be because we need the data to perform the contract that we have or are about to enter into with you, where it is necessary for our legitimate interests and that your legitimate interests and fundamental human rights do not override those interests or where we need the information for legal or regulatory reasons. Such circumstances include:

- providing services to our clients and potential clients;
- managing the financial relationships with our clients;
- fulfilling contractual obligations with our clients;
- contacting you from time to time for research purposes. We may contact you by email, phone or mail;
- internal record-keeping;
- improving our services to you
- conducting 'Know Your Customer' activities, including anti-money laundering checks;
- releasing your personal information to regulatory or law enforcement agencies, if they require us to do so by law for the prevention, detection and investigation of crimes;
- for compliance with legal, regulatory and tax reporting obligations;
- marketing our related products and services directly to you, and advise you of any updates to our services. Where we do so you will be able to unsubscribe at any time from receiving any further communications from us;
- delivering relevant website content to you and for measuring the effectiveness of the content we have;
- in connection with legal and dispute management;
- matching your skill sets with job vacancies;
- for payroll purposes;
- for contacting you in an emergency involving a candidate or member of staff; or
- contacting you in order to take up a reference.

We may use your personal data for these purposes if it is necessary for the formation or performance of a contract, for the fulfilment of statutory or other legal obligations, or where we deem it to be necessary for our legitimate interests or for mutually beneficial legitimate interests.

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you. In this case, we may not be able to provide the requested service to you but we will notify you if this is the case at the time.

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.

Disclosure of your personal data

We may disclose Personal Information we have collected from or about you to such persons or organisations who may use your personal information for the purposes set out in this Privacy Policy, including:

- any purpose disclosed by us when you provide the information;
- contractors, service providers and other third parties we use to support our business;
- if we reasonably believe that we are required or authorised by law or by Regulators to do so; or
- with your consent.

We may have to share your personal data with our affiliates and associates, both inside and outside the European Economic Area (the "EEA"). We may also need to transfer personal data to third parties, including third parties based outside the EEA, such as other advisors, accountants and third parties involved in your matters.

We require all third parties, including our affiliates, to respect the security of your 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.

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 disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need or legal or Regulatory reason 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.

Data Transfers

We may transfer the Personal Data we collect about you to recipients in countries other than the country in which the information originally was collected. Where you are based in the UK or elsewhere in the EU, this includes transfers outside of the UK and the European Economic Area ("EEA"). Those

countries may not have the same data protection laws as the country in which you initially provided the information.

Retention

It is our policy only to keep records of your personal data for as long as required under the legal obligations of delivering a service to you, or as required by relevant authorities or other legislation, whichever requirement is longer.

Legitimate interests

The GDPR states (in Article 6(1)(f)) that we can process your data where it is necessary for the purposes of the legitimate interests pursued by us except where such interests are overridden by your interests or fundamental rights or freedoms. Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience.

It is reasonable to expect that if we have had a professional relationship with you or you have contacted us about a job or we find that you are looking for employment or you have posted your professional CV information on a job board or professional networking site, or we have been given your name as an emergency contact or as a referee, you are happy for us to use your personal data to contact you for a relevant reason. If you don't want any further contact with us you can ask us to stop by contacting us using the details at the end of this Privacy Notice.

Links to other websites and social media

Our website may contain links to other websites of interest. However, once you have used these links to leave our site, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide while visiting such sites and such sites are not governed by this privacy statement. You should exercise caution and look at the privacy statement applicable to the website in question.

Your rights and choices

You have individual rights under the GDPR. Your rights are listed and explained below. We offer you certain choices in connection with the data we collect from you. You can exercise any of these rights by contacting us. To update your preferences or submit a request, please contact us as indicated in the "How to Contact Us" section of this Privacy Notice.

Your specific rights where you are a user in the UK or the EU are as follows:

The right to be informed: – You have the right to be informed of what we do with your data. The detail of what we do is in this privacy notice.

The right of access: – You have the right to ask us to confirm what information we hold about you. You can exercise this right by submitting a Data Subject Access Request. We may ask you to verify your identity and for more information about your request. We will respond to any request to access your data within one month.

The right to rectification: – You have the right to update your data if you think it's incorrect. We may ask you to verify your identity and for more information about your request.

The right to erasure: – You have the right to have your personal data deleted (right to be forgotten). We will make every reasonable effort to remove your personal data, however, this may not always be possible if we need to retain your data for purposes of billing or if there are legal requirements for us

to keep your data. We may ask you to verify your identity and for more information about your request. We will respond to any request to delete your data within one month and let you know the outcome of your request.

The right to restrict processing: – You have the right to ask us to stop processing your data. Where consent has been given to process your data, you can withdraw that consent at any time by contacting us using the details at the bottom of this notice. You can raise any concerns to the processing or use of your personal data by us either to us or to the appropriate data protection authority. If you withdraw your consent and restrict our ability to process your data, we may not be able to provide certain products or services to you.

The right to data portability: – You have the right to have the personal data you have given us transferred to another company and we will make every reasonable effort to comply with your request.

The right to object: – You have the right to object to us processing your personal data where we do so under legitimate interests or to enable us to perform a task in the public interest or exercise official authority or to send you direct marketing materials or for scientific, historical, research or statistical purposes. The “legitimate interests” and “direct marketing” categories above are the ones most likely to apply to our Candidates, Clients and Suppliers. If your objection relates to us processing your personal data because we deem it necessary for your legitimate interests, we must act on your objection by ceasing the activity in question unless we can show that we have compelling legitimate grounds for processing which overrides your interests or we are processing your data for the establishment, exercise or defence of a legal claim.

Rights in relation to automated decision making and profiling: – Automated individual decision-making is a decision made by automated means without any human involvement, such as a recruitment aptitude test which uses pre-programmed algorithms and criteria. We do not use any automated decision making tools. Profiling is where we use the information we have on you to classify you into different groups or sectors, using algorithms and machine-learning. We do not use any profiling techniques. However, if you think we are doing so you have the right to ask us to explain and to ask us to stop doing so.

Right to complain: - You have the right to complain to the data protection regulator in your country. You can find out more information about your rights by contacting the Information Commissioner’s Office, or by searching their website at <https://ico.org.uk/>

How to contact us:

If you have any comments or questions on this Privacy Notice please contact us via Compliance on 020 3574 4635 or on info@natriumcapital.com