



## **Privacy Policy**

Okavango Capital Partners, Ltd., (“Okavango,” “we,” “us,” or “our”) is committed to protecting and respecting your privacy. This privacy statement sets out the basis on which we will process any personal information that we may collect about you as a visitor to our website or a contact at one of our prospective or current investors, prospective or current portfolio companies, suppliers or other business partners.

### **What information do we collect from you?**

We may collect and process the following information about you:

#### ***Information you provide to us***

This is information about you that you give to us by giving us a business card (or similar) or corresponding with us by telephone, post, email or otherwise. It may include, for example, your name, address, email address and telephone number; information about your business relationship with Okavango Capital; and information about your professional role, background and interests.

#### ***Information our website, other systems, or research collect about you***

If you visit our website it may automatically collect some information about you and your visit, including the Internet protocol (IP) address used to connect your device to the Internet and some other information such as your browser type and version and the pages on our site that you visit. Our website may also download cookies to your device.

#### ***Emails you exchange with us***

If you exchange emails, telephone conversations, or other electronic communications with our employees and other staff members, our information technology systems may record details of those conversations, sometimes including their content.

Further to the categories of data mentioned above, Okavango guarantees that we neither request, collect, nor process special categories of personal data (i.e., personal information specifying criminal offences/convictions, medical or health conditions, biometric or genetic data, racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership).

### **How will we use your information?**

We may use your information for the following purposes:

- To operate, manage, develop, and promote our business and, in particular, our relationship with the organisation you represent (if any) and related transactions – this includes, for example, marketing and billing/payment purposes;
- To operate, administer, and improve our website and other aspects of the way in which we conduct our operations;



- To protect our business from fraud, money-laundering, breach of confidence, theft of proprietary materials and other financial or business crimes;
- To comply with our legal and regulatory obligations.

We may from time to time review information about you held in our systems – including the contents of and other information related to your email and other communications with us – for compliance and business-protection purposes as described above. Your emails and other communications may also occasionally be accessed by persons other than the member of staff with whom they are exchanged for ordinary business management purposes (for example, where necessary when a staff member is out of the office or has left Okavango).

We will only process your personal information as necessary so that we can pursue the purposes described above, and then only where we have concluded that our processing does not prejudice you or your privacy in a way that would override our legitimate interest in pursuing those purposes. In exceptional circumstances we may also be required by law to disclose or otherwise process your personal information. We will tell you, when we ask you to provide information about yourself, if provision of the requested information is necessary for compliance with a legal obligation or, on the other hand, if it is purely voluntary and there will be no implications if you decline to provide the information. Otherwise you should assume that we need the information for our business or compliance purposes (as described above). If you are uncertain as to Okavango's need for information that we request from you, please contact the Okavango representative asking for the information, or contact us (see below) with your query.

### **Disclosure and international transfer of your information**

We may disclose personal information about you, where reasonably necessary for the various purposes set out above:

- to the employees and/or consultants of Okavango based abroad;
- to your colleagues within the organization that you represent;
- to service providers who host our website or other information technology systems or otherwise hold or process your information on our behalf, under strict conditions of confidentiality and security;
- business partners, suppliers and sub-contractors for the performance of any contract we enter into with them or you;
- to a person who takes over our business and assets, or relevant parts of them; or
- in exceptional circumstances to competent regulatory, prosecuting and other governmental agencies, or litigation counterparties, in any country or territory; or where we are required by law to disclose.

These disclosures may involve transferring your personal information overseas. If you are dealing with us within the European Economic Area (or the UK, after it has left the European Economic Area), you should be aware that this may include transfers to countries outside the European Economic Area / UK, which do not have similarly strict data privacy laws. In those



cases, where we transfer personal data to other employees of Okavango or our service providers, we will ensure that our arrangements with them are governed by data transfer agreements, designed to ensure that your personal information is protected, on terms approved for this purpose by the European Commission. Please contact us (see below) if you would like to know whether any such agreements are in place or, if so, to see a copy.

### **How long do we keep your personal information?**

We will delete the information that we hold about you when we no longer need it. We will retain your data in accordance with our records management policies. Note that we may retain some limited information about you even when we know that you have left the organisation that you represent, so that we can maintain a continuous relationship with you if and when we are in contact with you again, representing a different organisation.

### **What are your rights?**

You may have a right of access to the personal information that we hold about you, and to some related information, under data protection law. You can also require any inaccurate personal information to be corrected or deleted. You can object to our use of your personal information for direct marketing purposes at any time and you may have the right to object to our processing of some or all of your personal information (and require them to be deleted) in some other circumstances.

If you wish to exercise any of these rights, please contact us as set out below. You can also lodge a complaint about our processing of your personal information with the Information Commissioner's Office in the UK.

### **Contact us**

We welcome questions, comments and requests regarding this privacy statement and our processing of personal information. Please email us at [j.oriol@okavango-capital.com](mailto:j.oriol@okavango-capital.com).

### **Changes to this policy**

Any changes we make to this privacy statement in the future will be posted on our website ([www.okavango-capital.com](http://www.okavango-capital.com)) and made available upon request.