

# Pavilion Alternatives Group Limited

## Privacy Notice

### Introduction

Pavilion Alternatives Group Limited (“Pavilion”) provides discretionary and non-discretionary private markets advisory services, to non-profit institutions, family offices, corporate and public pension funds, public authorities and sovereign wealth funds. Pavilion and its employees place a high priority on protecting personal and financial information it holds. We do not disclose clients’ confidential information, or that of former clients, except as permitted by you or required by law.

### What type of personal data do we collect and where do we get it from?

Pavilion may collect non-public personal information about you from your discussions with us, from legal documents, from information you supply about your investments or portfolio, from applications and other forms completed by you or provided to us by your authorized representatives and other fiduciaries. We may also collect personal data from email correspondence, telephone calls, paper communications, social media, our own website and online platforms, visiting our offices, enquiring about services from us, providing services to us and trade events such as conferences or exhibitions. This information may include contact details and biographical data. For those visiting our website or engaging with us through social media, we may collect information relating to IP addresses, social media handles and usernames.

### How do we collect personal information?

Pavilion may collect and process information that you provide during your correspondence with us. This could include, but is not limited to, any of the following ways:

- Giving information directly to us by methods including presentation material
- Communicating with us through methods including but not limited to e-mail, telephone and written correspondence

### How do we use personal information?

Pavilion is part of Pavilion Financial Corporation which has subsidiaries in Europe, North America and Asia. From time to time, we may ask employees in other parts of the Group to process your personal data on our behalf. All employees in the Group are under the same duty of confidentiality and we ensure the same level of protection is afforded to your personal data no matter where it is processed.

Unless expressly agreed otherwise, we may disclose the information described above to affiliated entities, custodians, fund administrators, investment managers, venture capital and private equity fund managers, and other non-affiliated companies or individuals, such as legal, audit, and tax advisors, in the manner and to the extent permitted by you or as required by law. We may also disclose the information described above to other non-affiliated service providers, such as data storage for our everyday business purposes in supporting our provision of services. We require third parties to respect the security of your data and to treat it in accordance with the law. We will share your personal information with third parties where required by law.

## **International Transfer of Data**

Pavilion may send your data outside the jurisdiction from which it originated or was collected. Where personal data is transferred or accessed outside of a specific jurisdiction, we require that appropriate safeguards are in place to comply with any applicable data protection regulations.

## **Your choices in relation to personal information**

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your relationship with us. You also have rights and choices which you can exercise with respect to the data we hold on you. You have the right to:

- Obtain access to your personal information
- Withdraw consent
- Object to direct marketing
- Ask us to correct any errors or delete the information we hold
- Object or restrict our processing of your information
- Request a copy of your personal information
- Retention and destruction of personal information

Pavilion takes reasonable steps to ensure the accuracy of the information we hold about you. We will not use your personal information unless it is (to our knowledge) accurate and up to date. We typically will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal 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 unauthorized 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.

## **Security**

The transmission of data over the internet is not completely secure. Although we will use our reasonable commercial efforts to protect your personal information, we cannot guarantee its security. Once we have received your data we will use strict security measures to try to protect it against loss, misuse, unauthorized alterations or interception when transferred electronically. All clients who access performance data and other investment information from our website receive unique login and password identifiers. The firm maintains physical, electronic and procedural safeguards including the use of encryption technologies to protect your confidential information.

## **Changes**

We may change the terms of this Privacy Policy from time to time. You may find a current version of this policy posted on our website at [www.pavilioncorp.com](http://www.pavilioncorp.com)

## **Your data protection rights**

The personal data Pavilion hold on you is your data and you have certain rights in relation to it.

You have the right to access your personal data and you can do so verbally, by email or in writing. We will provide you with a copy and advise you of the purpose of the processing, the types of data and with whom we share it and the length of time we hold them for. We will provide this to you within one month of receiving your request.

You have the right to have corrected any personal data that is not accurate without undue delay and to have any personal data erased where a) the personal data has been unlawfully processed, b) where it is no longer necessary for the purposes for which it was collected or c) there are no legal grounds for processing.

If any of the situations in the previous paragraph apply you also have the right to ask us to stop processing your personal data and if you exercise this right we must not process your personal data until we have informed you that we intend to start processing again.

We do not engage in automated individual decision making.

You can at any stage make a complaint to the ICO. The contact details are as follows:-

**Information Commissioner's Office**

Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF  
Tel: +44 1625 545 745

**Contact Information**

For further details about our privacy policy, please contact:

Rebecca Stiff  
Director, Compliance  
Pavilion Alternatives Group Limited  
20 Grosvenor Place  
London  
SW1X 7HN  
Tel: +44 20 7838 7640  
Email: [rstiff@pavilioncorp.com](mailto:rstiff@pavilioncorp.com)

**May 2018**