

Privacy notice

1. Introduction

This privacy notice has been prepared by Hargreave Hale AIM VCT plc ("the HH VCT", "we", "us" or "our"). We are committed to protecting the privacy of individuals whose data we process ("you" or "your").

This privacy notice explains how the HH VCT will collect and process your personal data as a controller of data supplied by shareholders and potential investors with holdings in and/or investing in the HH VCT, and other individuals, including through your use of our website (www.hargreaveaimvcts.co.uk) and by sending us correspondence, subscription forms or other materials submitted to us in the course of your relationship with us.

In addition, this privacy notice outlines your data protection rights under the provisions of applicable data protection law, including the UK GDPR.

This website is not intended for children, and we do not knowingly collect data relating to children.

2. Who We Are

- a. Our full contact details are: Hargreave Hale AIM VCT plc, Talisman House, Boardmans Way, Blackpool, England, FY4 5FY. The registered company number is 05206425.
- b. The HH VCT is not currently subject to a mandatory requirement to appoint a DPO, however, the Board takes responsibility for overseeing questions in relation to this privacy notice and for ensuring the HH VCT has in place policies and practices in accordance with data protection laws.
- c. The HH VCT is party to an investment management agreement with Canaccord Genuity Asset Management Limited ('CGAM'), an administration agreement with CGAM and, from time to time, an offer agreement with CGAM (CGAM forms part of Canaccord Genuity Wealth Management 'CGWM'). CGAM (together with the other services providers set out in this privacy notice) conducts data processing activities on behalf of the HH VCT in accordance with this privacy notice.
- d. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact

aimvct@canaccord.com or write to the address above marked for the attention of the VCT Administration Team.

3. Important Information

- a. This privacy notice was last amended on 5 June 2024. It supersedes any earlier versions. We may update this privacy notice from time to time and, when we do so, we will notify you of changes by posting the updated version on our website and/or by contacting you by email. When this privacy notice is updated, we will provide the date of the last update in this section 3a. We recommend that you regularly check for changes and review this privacy notice each time you visit our website.
- b. 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.
- c. It is also important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us. You can ask us to rectify or update your personal information at any time by contacting our administrator at aimvct@canaccord.com.
- d. The HH VCT's website may include links to third party websites, plug-ins or applications which may allow third parties to collect or share your personal data. We are not responsible for their use of your personal data and cannot control it. When you leave our website, we encourage you to read the privacy notice of every website you visit.

4. The Data We Collect About You

- a. Personal data, or personal information, means any information about an individual from which that person can be identified ("Personal Data").
- b. We may only collect, use, store and transfer different kinds of Personal Data about you where we have a lawful basis for processing. We rely on one or more of the following lawful bases: (i) to perform the contract we are about to enter into or have entered into with you, (ii) to comply with a legal obligation to which we are subject, (iii) where you have given consent and/or (iv) where processing is necessary for our legitimate interests or those of a third party.
- c. We have grouped together the different kinds of Personal Data we collect, use and share as follows:
 - i. **Identity Data** including name, title, nationality, marital status, age/date of birth, gender and other Personal Data which is contained in your client ID / anti money laundering documentation such as your passport, driving licence or birth certificate or

otherwise received by us in connection with our client ID / anti money laundering checks.

- ii. **Contact Data** including postal addresses, email addresses, telephone numbers and the name of the organisations you work for / have worked for.
 - iii. **Financial Data** including bank account details, payment card details, NI number, income, financial and tax information, investments data and valuations, information contained within bank statements and bills and other information provided for client ID / anti money laundering checks.
 - iv. **Transaction Data** including details about payments to and from you and other details of products or services you have purchased from us and/or we have provided to you.
 - v. **Technical Data** this may include internet protocol (IP) address and other identifying information required for your device to communicate with our website.
 - vi. **Communications Data** including your preferences in receiving marketing from us and your communication preferences.
- d. We may also collect, use and share aggregated data such as statistical or demographic data for any purpose. This may be derived from your Personal Data but is not legally considered Personal Data as it does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the number of investors in the HH VCT. If we combine or connect aggregated data with your Personal Data so that it can directly or indirectly identify you, then we treat the combined data as Personal Data which will be used in accordance with this policy.
- e. We do not collect any special categories of Personal Data about you (i.e. details about your race, ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Other than any information that we may collect as part of client ID / anti money laundering / compliance activity, we do not collect any information about criminal convictions and offences.
- f. 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 (for example, if you send us money but do not provide the required proof of identification documentation for anti-money laundering purposes). In this case, we may not be able to provide you with what you have requested from us but we will notify you if this is the case at the time.

5. How Your Personal Data is Collected

We use different methods to collect Personal Data from and about you including:

- a. From you directly. You may give us your Identity, Contact, Financial and Communications Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes Personal Data you provide when you:
 - i. request information about one of our products or services;
 - ii. invest in one of our products; or
 - iii. telephone or email us or provide information or feedback.
- b. From third parties. We may receive Identity, Contact and Financial Data about you from your financial intermediary or financial advisor or other relevant third party.
- c. From our website. We may receive Identity, Contact, Financial and Technical Data, through your access to and use of our website (including when you contact us via the 'contact us' form on our website or sign up to receive marketing communications), we may also receive Identity, Contact and Communications Data directly from you.

6. How we use Your Personal Data

- a. In the table below we have summarised the ways that we plan to use your Personal Data, the purposes for which we will use it, and which of the lawful bases we rely on to do so.
- b. We may process your Personal Data for more than one lawful basis depending on the specific purpose for which we are using it. Please contact us at aimvct@canaccord.com if you need details about the specific legal basis we are relying on to process your Personal Data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To update and maintain records for the HH VCT, including maintaining statutory registers.	Identity	Necessary to comply with a legal obligation
	Contact	Performance of a contract or potential contract with you
	Financial	
	Transaction	Necessary for our legitimate interests (for running the HH VCT and to keep our records updated)

To register you as a new shareholder.	Identity Contact Financial	Performance of a contract with you Necessary to comply with a legal obligation
To facilitate the investment in our products.	Identity Contact Financial Transaction Communications	Performance of a contract with you Necessary for our legitimate interests (to run the HH VCT and to provide our products and services)
To verify your identity, verify your eligibility for certain products or services, carry out credit reference checks, client ID / anti money laundering checks, prevent or detect fraud or money laundering.	Identity Contact Financial Transaction Communications	Performance of a contract with you Necessary to comply with a legal obligation Necessary for our legitimate interests (to prevent fraud and to run the HH VCT)
To contact you and to manage our relationship with you, which may include: Providing you with monthly fact sheets Asking you to leave a review or take a survey Notifying you about changes to our terms or privacy policy	Identity Contact Financial Transaction Communications	Performance of a contract with you Necessary to comply with a legal obligation Necessary for our legitimate interests (to run the HH VCT, to keep our records updated and to study how shareholders use our website/services)
To provide shareholder support and/or deal with any shareholder complaints	Identity Contact Financial Transactional Technical	Necessary to comply with a legal obligation Performance of a contract with you Necessary for our legitimate interests (including to protect our business and our shareholders, run the HH VCT,

		and to keep our records updated)
To provide in-person shareholder update meetings about our business and allow access to any available guest Wi-Fi	Identity Contact Technical	Necessary for our legitimate interests (including to run the HH VCT, to protect our business, keep our shareholders updated, provide access to WiFi and ensure secure and safe access to premises and facilities)
To scan and monitor emails sent to us (including attachments) for viruses or malicious software, to process and encrypt Personal Data to protect and manage email traffic	Identity Contact Technical	Necessary for our legitimate interests (including to protect and keep secure our business, systems, data and communications)
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	Identity Contact Technical	Necessary for our legitimate interests (including for running our business and the HH VCT, to protect our business, the provision of administration and IT services, for network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) Necessary to comply with a legal obligation
For the marketing of the HH VCT (see also section 7 below)	Identity Contact Technical Communications	Necessary to comply with a legal obligation Performance of a contract with you Necessary for our legitimate interests (including the promotion of our business activities and the fulfilment of a third-party request)
To carry out such other actions as are necessary to manage	Identity Contact	Necessary to comply with a legal obligation

our business activities, including by processing instructions, monitoring and recording electronic communications (including telephone calls and emails)	Financial Transaction Technical Communications	Performance of a contract with you Necessary for our legitimate interests (including to run the HH VCT, for quality control, analysis and training purposes and enforcing or defending our rights and/or interests)
To assert or defend any legal rights and to deal with any legal disputes	Identity Contact Financial Transaction Communications	Necessary to comply with a legal obligation Performance of a contract with you Necessary for our legitimate interests or those of a third party (including to protect and/or defend our business and the HH VCT)

7. Marketing

- a. Except as set out below in specific limited circumstances, we do not currently undertake marketing activities to retail clients.
- b. You will only receive marketing communications from us and our agents on our behalf where we have your express opt-in consent provided that, in each case, you have not withdrawn your consent.

You have the right to withdraw your consent at any time by:

- i. clicking on the unsubscribe option in any email received; or
 - ii. emailing us at any time at aimvct@canaccord.com.
- c. If you do withdraw your consent, this will result in us ceasing to directly market products and services to you, but we will still process your Personal Data in accordance with section 6 above.
 - d. We will get your express opt-in consent before we share your personal data outside the HH VCT for marketing purposes. You have the right to withdraw consent for us to pass your information to third parties for marketing purposes. If you no longer wish to be contacted by third parties for marketing purposes, please follow the instructions in their marketing communications, or consult their privacy policies about how to unsubscribe.

- e. If you are a current shareholder, we may send you service communications for administrative or customer service purposes (but this is not considered marketing).

8. Cookies

- a. We use cookies on our website. Some of these cookies are necessary, for example, to maintain the security of the system or to ensure that we do not offer you access to products or services which are not available in your jurisdiction. Some of these cookies are optional and are used to enhance the user experience, for example, to remember that you have accepted our terms and conditions and to remember your selected client preferences upon re-entry to our website. We also use Google Analytics cookies to help us improve your experience by collecting and reporting information on how you use our website. The cookies collect information in a way which does not directly identify anyone. You may turn off optional cookies on your browser but please be aware that parts of the site will not function correctly if you disable cookies.
- b. For more information regarding our use of cookies, please see our Internet Use Policy, which may be viewed [here](#).

9. Disclosures of Your Personal Data

- a. We may share your Personal Data with external third parties on an as necessary basis for the purposes set out in the table at section 6 above, such as:
 - 1. Your financial and other professional adviser(s), any relevant financial intermediary, financial administration platforms or aggregators or financial promoter, but only with your consent;
 - 2. The Company's auditor, administrator, investment manager, receiving agent, company secretary, registrar, promoter, legal and tax advisers and/or other third parties who assist the HH VCT in relation to its investment products (including other companies within the Canaccord Genuity group);
 - 3. The FCA, HM Revenue & Customs, National Crime Agency, the Information Commissioner's Office and any other relevant regulators and other authorities based in the United Kingdom who require information on or reporting of activities in certain circumstances and to courts and other relevant authorities;
 - 4. IT service providers, including Optimizely DXP, who host our website, Kin+Carta, who provide website support and maintenance, and Canaccord Genuity Wealth Limited, who maintain our website and Dotdigital who provide our email software;

5. Other third parties such as our insurers, anti-money laundering, client ID and/or credit checking agencies, which may be based outside of the UK;
 6. Third parties, if required to do so to meet applicable law, the order of a Court or market rules and codes of practice applicable to the circumstances at the time; and/or
 7. Third parties to whom we may seek to sell, transfer or merge with. Alternatively, we may seek to acquire other businesses or to merge with them. If a change happens to the HH VCT, then the new owners may use your Personal Data in the same way as set out in this privacy notice.
- b. We require all third parties 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 we only permit them to process your Personal Data for specified purposes and in accordance with our instructions (which are set out in an appropriate contract).

10. International Transfers

- a. In limited circumstances, we may transfer your Personal Data out of the UK. If so transferred, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:
 - i. We will only transfer your Personal Data to countries that have been deemed to provide an adequate level of protection for personal data by the UK Secretary of State; or
 - ii. Where we use certain service providers, we use specific contractual terms approved for use in the UK which give the transferred personal data the same protection as it has in the UK, such as the International Data Transfer Agreement.
- b. Please contact us at aimvct@canaccord.com if you would like further information on the specific mechanism used by us when transferring your Personal Data out of the UK.

11. Data Security

Once we have received your personal data, we will use reasonable and necessary procedures and security features to try and prevent unauthorised access. For example, we limit who can access your Personal Data to those individuals and third parties who need to know it and who are subject to a duty of confidentiality. If we become aware of a data breach, we will notify the Information Commissioner's Office unless we consider that the breach is unlikely to result in a risk to your rights and freedoms. If we believe that the data

breach is likely to result in a high risk to your rights and freedoms, we will notify you in accordance with applicable legal requirements.

12. Data Retention

- a. We will only retain your Personal Data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. We may also retain your Personal Data for a longer period in the event of a complaint, to protect and enforce our rights, or if we reasonably believe that there is a prospect of legal claims.
- b. 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 unauthorised 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. We have a data retention policy which is available on request, please contact us at aimvct@canaccord.com if you would like a copy.
- c. In some circumstances we may anonymise your Personal Data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.
- d. In some circumstances you can ask us to delete your data: see 13.a.ii below for further information.

13. Your Legal Rights

- a. Under data protection law you have the right to protect and look after your Personal Data. You have the right to:
 - i. ask us for the Personal Data that we hold and process about you (this is often referred to as a data subject access request);
 - ii. ask that any inaccurate information we hold about you is corrected;
 - iii. ask that we delete or restrict the Personal Data we hold about you in certain situations;
 - iv. ask that we stop using your Personal Data for certain purposes;
 - v. ask that we do not make decisions about you using completely automated means; and/or
 - vi. ask that Personal Data we hold about you is given to you, or where technically feasible a third party chosen by you, in a commonly used, machine-readable format.

- b. If you wish to exercise any of the rights set out above, please contact us at aimvct@canaccord.com. The rights listed above may not apply in certain circumstances or may be subject to limitations, and so we may not always be able to comply with your request to exercise these rights.
- c. We will usually respond to a request from you to exercise your rights within 1 month of receipt, but it might take longer if your request is particularly complex or if you have made a number of requests. Please be aware that we may need to process your Personal Data and/or request specific information (including appropriate identification) from you to help us comply with your request. You will not usually have to pay a fee to exercise these rights, but we reserve the right to if your request is clearly unfounded, repetitive or excessive, alternatively we may refuse to comply with your request.

14. Complaints and Feedback

If you would like to speak to us about how we handle your Personal Data, please contact aimvct@canaccord.com in the first instance. You can also make a complaint about us to the Information Commissioner's Office which is the UK supervisory authority for data protection issues. We would, however, appreciate the opportunity to deal with your concerns before you approach the Information Commissioner's Office.

15. Approval

The Audit Committee of the Company is responsible for the review of this Policy at least annually to ensure its effectiveness. Any revisions will be recommended to the Board for consideration and approval. This Policy was approved by the Board on 7 October 2024.