

Privacy Policy

Introduction

Spheres is strongly committed to protecting personal data. This privacy statement describes why and how we collect and use personal data and provides information about individuals' rights. It applies to personal data provided to us, both by individuals themselves, or by others. We may use personal data provided to us for any of the purposes described in this privacy statement or as otherwise stated at the point of collection.

"Spheres" (and "we", "us", or "our") refers to Spheres Investment Advisor Ltd (the company registered in England under registration no. 14746184 and with its registered address at Counterslip, 5th Floor Halo, Bristol BS1 6AJ, Great Britain) and such other Spheres affiliates in the UK and their subsidiaries that: (1) is a contracting party for the purposes of providing or receiving services, (2) posted a position for which you are applying, or (3) you have a role or relationship with.

Personal data is any information relating to an identified or identifiable living person. When "you" or "your" are used in this statement, we are referring to the relevant individual who is the subject of the personal data. Spheres processes personal data for numerous purposes, and the means of collection, lawful basis of processing, use, disclosure, and retention periods for each purpose may differ. When collecting and using personal data, our policy is to be transparent about why and how we process personal data.

Our Privacy Policy runs in parallel with other relevant privacy legislation such as the Privacy and Electronic Communications Regulations 2003 which implement the e-Privacy Directive in the UK.

Security

We take the security of all the data we hold very seriously. We have a framework of policies, procedures and training in place covering data protection, confidentiality and security and regularly review the appropriateness of the measures we have in place to keep the data we hold secure.

We will only share personal data with others when we are legally permitted to do so. When we share data with others, we put contractual arrangements and security mechanisms in place as appropriate to protect the data and to comply with our data protection, confidentiality and security standards.

In common with other professional service providers, we use third parties located in other countries to help us run our business. As a result, personal data may be transferred outside the countries where we and our clients are located. This includes to countries outside the European Union and to countries that do not have laws that provide specific protection for personal data. We have taken steps to ensure all personal data is provided with adequate protection and that all transfers of personal data outside the EU are done lawfully. Where we transfer personal data outside of the EU to a country not determined by the European Commission as providing an adequate level of protection for personal data, the transfers will be under an agreement which covers the EU requirements for the transfer of personal data outside the EU, such as the European Commission

approved standard contractual clauses. The European Commission approved standard contractual clauses are available [here](#).

Data processing

We regularly collect personal data in the context of our business activities. The types of personal data relating to you that we may collect, and the purposes for which we process this data, depends on the nature of your interaction with us. Please read the table below for more information. Under the GDPR, we are required to specify the legal basis under which we are allowed to process your personal data. Generally, we may process your personal data to perform a contract with you or for your benefit, for the establishment, exercise or defence of legal claims or proceedings and to comply with our legal and regulatory obligations. In particular, we may process your personal information in order to create, manage and support your Spheres account (app.spheres.io), including to carry out onboarding and due diligence checks, to perform investment monitoring and tracking, and to communicate investment opportunities with you. Other bases for processing your personal information are described below.

How we obtain your personal data	Types of personal data that we may process	Purpose / legal basis for processing
When you browse or interact with our website, access or use your Spheres account (app.spheres.io), including through the use of cookies, communicate with us in any way (including through your Spheres account)	· Name, title, gender · Contact details (email address, physical address, phone numbers) · Your employer · Description of yourself, your position, your requirements or comments, and your relationship to a person · Information relating to your Spheres account, for example, username, password, geographic location, authentication codes, and links to reset your password. · Any other information you voluntarily provide to us during your use of your Spheres account, for example, account bank account information, information regarding your investments, and personal data included in any correspondence you have with Spheres. · Other information such as your job title, salary or net worth.	Legitimate interests: · Managing business communications. · Maintaining and managing our website and the Spheres app. · Responding to your communication(s) with us. · Improving the quality of our communications and interactions with our visitors · Understanding visitor behaviour patterns to improve our website and the Spheres app / your Spheres account. · Sending you product and service updates, curated notifications and marketing communications. · Administering and protecting our business, including day to day operations. Contract: · Fulfilling our obligations under our engagement or other agreement with you

	· Technical information (including your IP address, domain name, type of browser and operating system used) · Your preferences · Name, title, gender · Contact details (personal or business email address, telephone numbers, physical address) · Company and position · Information you disclose to us, which may include special categories of data · Information from identification documents · Information from investment documents · Materials we may need to collect from your or 3rd parties regarding you in order to complete our own AML/KYC/CFT and other identification obligations. · Information we may need to support our regulatory obligations.	
When you provide personal data to us in order to receive event invitations, business updates, investment opportunities, or other marketing materials	· Name, title, gender · Contact details (personal or business email address, telephone numbers, physical address) · Company and position · Your communication preferences · Personal data that you disclose to us, such as dietary and access requirements, comments, or requests	Consent (opt in): · On the basis of the consent that you have provided us to receive certain communications. Legitimate Interests: · Ensuring the efficient management of events. · To promote our business and relationships.
If you are a member of the management team in, or employed by, a business, fund or other asset we have invested in, or are contemplating investing in	· Name, title, gender · Contact details (personal or business email address, telephone numbers, physical address) · Company and position · CV details of your	Legitimate interests: · When we are required to comply with laws other than EEA or UK laws · Evaluating and administering potential transactions

	previous employment history and professional activities	· Keeping records of assets and investments · Receiving advice from our professional advisors, including accountants, lawyers and other · Consultants · Providing business updates
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Personal data held by us may be transferred to:

- **Other Spheres group member firms**

We may share personal data with other Spheres group member firms where necessary for administrative purposes and to provide professional services to our clients (e.g. when providing services involving advice from Spheres group member firms in different territories).

- **Third party organisations that provide applications/functionality, data processing or IT services to us**

We use third parties to support us in providing our services and to help provide, run and manage our internal IT systems, including those that support your Spheres account (app.spheres.io). For example, providers of information technology, cloud-based software as a service-providers, identity management, website hosting and management, data analysis, data back-up, security and storage services. The servers powering and facilitating that cloud infrastructure are located in secure data centres around the world, and personal data may be stored in any one of them. Further details of these providers are included below.

Recipient Type
Software Services and IT support, including AWS, cloud computing services, data storage service providers, website hosting, communication and collaboration services, user account registration and authentication services, and external screening services.
Azure cloud services and business applications, including email, calendar, data analytics services and software, performance monitoring tools, product engineering and design tools, retargeting platforms, sales and marketing tools, testing tools, and finance and accounting tools
Datasite services
Customer Relationship Management software

- **Third party organisations that otherwise assist us in providing goods, services or**



information

We will share your data with third parties in order to facilitate investments and the monitoring, tracking and analysis of investments (including those represented on your Spheres account (app.spheres.io). Such third parties include fund managers, fund administrators, brokers, custodians, corporate services providers, advisors and other necessary third parties. On certain client engagements, we may engage or otherwise work with other providers to help us provide professional services to our clients. We may also, occasionally, share anonymized aggregated data with marketing partners.

- **Our clients**

Where we need to process personal data to provide professional services to our clients, we may share personal data in our deliverables (such as the reports we create).

- **Auditors, insurers and professional advisers**

Our funds' auditors are PWC at rue Gerhard Mercator 2 2182 Luxembourg. We have a number of business insurance policies in place and we may need to share personal data with the insurer, for example, in the event of a claim. We use other professional advisers, for example, law firms, as necessary to establish, exercise or defend our legal rights and obtain advice in connection with the running of our business. Personal data may be shared with these advisers as necessary in connection with the products and services they have been engaged to provide.

- **Law enforcement or other government and regulatory agencies or to other third parties as required by, and in accordance with, applicable law or regulation**

Occasionally, we may receive requests from third parties with authority to obtain disclosure of personal data, such as to check that we are complying with applicable law and regulation, to investigate an alleged crime, to establish, exercise or defend legal rights (e.g. tax and regulatory authorities). We will only fulfil requests for personal data where we are permitted to do so in accordance with applicable law or regulation.

Changes to this privacy statement

We recognise that transparency is an ongoing responsibility so we will keep this privacy statement under regular review.

This privacy statement was last reviewed in August 2024.

Data controller and contact information

We are generally controllers for the personal data we process, however, we may provide some services, such as payroll services, as a processor (in which case our client is the controller). If you have any questions about this privacy statement or how and why we process personal data, please contact us at info@spheres.io.

Data Retention Period

The compliance officer designate organises the retention of all collected data for a minimum of five years. Your rights regarding your data are detailed below.

Individuals' rights and how to exercise them

Individuals have certain rights over their personal data and controllers are responsible for fulfilling these rights.

Individuals' rights may include the right of access to personal data, to rectification of personal data, to erasure of personal data / right to be forgotten, to restrict processing of personal data, to object to processing of personal data, to data portability, the right to withdraw consent at any time (where processing is based on consent) and the right to lodge a complaint with a supervisory authority.

Please see further information about these rights, when they are available and how to exercise them below.

Your right of access to personal data

You have the right to obtain confirmation as to whether we process personal data about you, receive a copy of your personal data held by us as a controller and obtain certain other information about how and why we process your personal data (similar to the information provided in this privacy statement). This right may be exercised by emailing us at info@spheres.io. We aim to respond to any requests for information promptly, and in any event within the legally required time limits.

Your right to rectification / amendment of personal data

You have the right to request for your personal data to be amended or rectified where it is inaccurate (for example, if you change your name or address) and to have incomplete personal data completed. To update personal data submitted to us, you may email us at info@spheres.io.

When practically possible, once we are informed that any personal data processed by us is no longer accurate, we will make updates as appropriate based on your updated information.

Your right to erasure / right to be forgotten

You have the right to obtain deletion of your personal data in the following cases:

- the personal data are no longer necessary in relation to the purposes for which they were collected and processed;
- our legal grounds for processing is consent, you withdraw consent and we have no other lawful basis for the processing;
- our legal grounds for processing is that the processing is necessary for legitimate interests pursued by us or a third party, you object to our processing and we do not have overriding legitimate grounds;
- you object to our processing for direct marketing purposes;
- your personal data have been unlawfully processed; or
- your personal data must be erased to comply with a legal obligation to which

we are subject.

To request deletion of your personal data, please email us at info@spheres.io.

Your right to restrict processing

You have the right to restrict our processing of your personal data in the following cases:

- for a period enabling us to verify the accuracy of your personal data where you have contested the accuracy of the personal data;
 - your personal data have been unlawfully processed and you request restriction of processing instead of deletion;
 - your personal data are no longer necessary in relation to the purposes for which they were collected and processed but the personal data are required by you to establish, exercise or defend legal claims; or
 - for a period enabling us to verify whether the legitimate grounds relied on by us override your interests where you have objected to processing based on it being necessary for the pursuit of a legitimate interest identified by us.
- To restrict our processing of your personal data, please email us at info@spheres.io.

Your right to object to processing

You have the right to object to our processing of your personal data in the following cases:

- our legal grounds for processing is that the processing is necessary for a legitimate interest pursued by us or a third party; or
- our processing is for direct marketing purposes.

To object to our processing of your personal data, please email us at info@spheres.io.

Your right to data portability

You have a right to receive your personal data provided by you to us and have the right to send the data to another organisation (or ask us to do so if technically feasible) where our lawful basis for processing the personal data is consent or necessity for the performance of our contract with you and the processing is carried out by automated means.

To exercise your right to data portability, please email us at info@spheres.io.

Your right to withdraw consent

Where we process personal data based on consent, individuals have a right to withdraw consent at any time. We do not generally process personal data based on consent (as we can usually rely on another legal basis). Where we rely on your consent for our processing of your personal data, to withdraw your consent please email us at info@spheres.io or, to stop receiving an email from a Spheres marketing list, please click on the unsubscribe link in the relevant email. Please see the relevant "Use of personal data" sections of this privacy statement for further details

about our processing of personal data based on consent.

Complaints

We hope that you won't ever need to, but if you do want to complain about our use of personal data, please send an email with the details of your complaint to info@spheres.io. We will look into and respond to any complaints we receive.

You also have the right to lodge a complaint with the supervisory authority in your country of residence, place of work or the country in which an alleged infringement of data protection law has occurred within the EU. The Information Commissioner's Office ("ICO") is the UK data protection regulator/supervisory authority. For further information on your rights and how to complain to the ICO, please refer to the [ICO website](#).