

# AXM Venture Capital Limited

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## CONTENTS OF PRIVACY NOTICE

1. Introduction
2. Who are AXM Venture Capital Limited?
3. Explaining the legal bases we rely on
4. When do we collect your personal data?
5. What sort of personal data do we collect?
6. How and why do we use your personal data?
7. Combining your data for personalised direct marketing
8. How we protect your personal data
9. How long will we keep your personal data?
10. Who do we share your personal data with?
11. Where your personal data may be processed
12. What are your rights over your personal data?
13. How can you stop the use of your personal data for direct marketing?
14. Contacting the Regulator
15. Any questions?

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## 1. Introduction

This Privacy Notice explains in detail the types of personal data we may collect about you when you interact with us. It also explains how we'll store and handle that data, and keep it safe.

We know that there's a lot of information here, but we want you to be fully informed about your rights, and how the AXM Venture Capital Limited uses your data. We hope the following sections will answer any questions you have but if not, please do get in touch with us.

## 2. Who are AXM Venture Capital Limited?

AXM Venture Capital Limited (AXM) is an experienced, specialist digital, media, and creative industries investor, operating from offices in Manchester, Liverpool and London, with an interest in investing across the whole information and communication technology spectrum. In addition to the North West Fund 4 Digital & Creative, it currently manages two London-based digital and creative funds ([www.ccfund.co.uk](http://www.ccfund.co.uk)), which have attracted significant private co-investment alongside its own investment capital.

## 3. Explaining the legal bases we rely on.

The law on data protection sets out a number of different reasons for which a company may collect and process your personal data, including:

### Consent

In specific situations, we can collect and process your data with your consent.

When collecting your personal data, we'll always make clear to you which data is necessary in connection with a particular service.

### Legal compliance

If the law requires us to, we may need to collect and process your data.

For example, we can pass on details of people involved in fraud or other criminal activity affecting AXM Venture Capital Ltd to law enforcement.

### Legitimate interest

In specific situations, we require your data to pursue our legitimate interests in a way which might reasonably be expected as part of running our business and which does not materially impact your rights, freedom or interests.

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For example, we will use your address details to send you direct marketing information by email, telling you about services that we think might interest you. We may also send you updates with regards to our business, for example, telling you if we move office location.

#### **4. When do we collect your personal data?**

- When you contact us by any means with queries, complaints etc.
- When you visit our website.
- When you engage with us on social media.
- When you choose to complete any surveys we send you.
- When you fill in any forms which we have requested.
- When you've given a third party permission to share with us the information they hold about you.
- We may collect data from publicly-available sources (such as LinkedIn) when you have given your consent to share information or where the information is made public as a matter of law.

#### **5. What sort of personal data do we collect?**

- Details of your interactions with us.

For example, we collect notes from our conversations with you, details of any complaints or comments you make, meetings and communications and how and when you contact us.

- Copies of documents you provide to prove your age or identity where the law requires this (including your passport and driver's licence). This will include details of your full name, address, date of birth and facial image. If you provide a passport, the data will also include your place of birth, gender and nationality.
- Personal details which help us to recommend contacts and/ or services of interest.
- Your comments and any reviews.
- Your social media username, if you interact with us through those channels, to help us respond to your comments, questions or feedback.

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## 6. How and why do we use your personal data?

We want to give you the best possible client experience. One way to achieve that is to get the richest picture we can of who you are by combining the data we have about you.

We then use this to offer you contacts and services that are most likely to interest you.

The data privacy law allows this as part of our legitimate interest in understanding our clients and providing the highest levels of service.

Of course, if you wish to change how we use your data, you'll find details in the 'What are my rights?' section below.

Remember, if you choose not to share your personal data with us, or refuse certain contact permissions, we might not be able to provide some of the services you've asked for.

Here's how we'll use your personal data and why:

- To process any requests that you ask of us.

For example, your details may need to be passed to a third party to supply or deliver a service that you are interested in, and we may keep your details for a reasonable period afterwards.

- To respond to your queries, requests and complaints. Handling the information you sent enables us to respond. We may also keep a record of these to inform any future communication with us and to demonstrate how we communicated with you throughout. We do this on the basis of our contractual obligations to you, our legal obligations and our legitimate interests in providing you with the best service and understanding how we can improve our service based on your experience.
- To protect our business and your account from fraud and other illegal activities.
- If we discover any criminal activity or alleged criminal activity through our use of fraud monitoring and suspicious transaction monitoring, we will process this data for the purposes of preventing or detecting unlawful acts. We aim is to protect the individuals we interact with from criminal activities.
- With your consent, we will use your personal data and preferences to keep you informed by email, web, text, telephone about relevant contacts and services.

Of course, you are free to opt out of hearing from us by any of these channels at any time.

- To send you relevant personalised communications by post in relation to updates, contacts and services. We'll do this on the basis of our legitimate business interest.

You are free to opt out of hearing from us by post at any time.

- To send you communications required by law or which are necessary to inform you about our changes to the services we provide you. For example,

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updates to this Privacy Notice, and legally required information relating to your company such as PSC letters. These service messages will not include any promotional content and do not require prior consent when sent by email or text message. If we do not use your personal data for these purposes, we would be unable to comply with our legal obligations.

- To develop, test and improve the systems and services we provide to you. We'll do this on the basis of our legitimate business interests.
- To comply with our contractual or legal obligations to share data with law enforcement.

For example, when a court order is submitted to share data with law enforcement agencies or a court of law

- To send you survey and feedback requests to help improve our services. These messages will not include any promotional content and do not require prior consent when sent by email or text message. We have a legitimate interest to do so as this helps make our services more relevant to you.

Of course, you are free to opt out of receiving these requests from us at any time by updating your preferences in your online account.

- To inform our business decisions, we'll combine data captured by ourselves, third parties and data from publicly-available lists as we have described in the section 'What Sort of Personal Data do we collect?' We'll do this on the basis of our legitimate business interest.
- To process your meetings/appointment requests. Sometimes, we'll need to share your details with a third party such as when booking a meeting room. We do so to maintain our appointment with you. Without sharing your personal data, we'd be unable to fulfil your request.

## 7. Combining your data for personalised direct marketing

We may want to bring you services that are most relevant to your interests at particular times. To help us form a better, overall understanding of you as a customer, we combine your personal data captured by ourselves, third parties to whom you have given your consent to pass that data onto us and data from publicly-available lists as we have described in the section 'What Sort of Personal Data do we collect?' We'll do this on the basis of our legitimate business interest.

## 8. How we protect your personal data

We know how much data security matters to all our clients. With this in mind we will treat your data with the utmost care and take all appropriate steps to protect it.

Access to your personal data is password-protected.

We will monitor our system for possible vulnerabilities and attacks.

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## 9. How long will we keep your personal data?

Whenever we collect or process your personal data, we'll only keep it for as long as is necessary for the purpose for which it was collected.

At the end of that retention period, your data will either be deleted completely or anonymised, for example by aggregation with other data so that it can be used in a non-identifiable way for statistical analysis and business planning.

AXM Venture Capital Ltd will keep client data until 31<sup>st</sup> December 2025 to comply with FCA and EU rules of the 20-year retention rule. Clients' hard copy data will be protected securely in locked cabinets. After the 20-year period if there is no other reason to keep this information, unless a client specifically gives their consent or there is an overriding contractual reason why AXM Venture Capital Ltd needs to keep their information then personal details will be deleted from our records.

## 10. Who do we share your personal data with?

We sometimes share your personal data with trusted third parties.

For example, delivery couriers, meeting locations for room reservations, for fraud management, to handle complaints, to help us personalise our service to you and so on.

Here's the policy we apply to those organisations to keep your data safe and protect your privacy:

- We provide only the information they need to perform their specific services.
- They may only use your data for the exact purposes we specify.
- We work closely with them to ensure that your privacy is respected and protected at all times.
- If we stop using their services, we will request that any of your data held by them will either be deleted or rendered anonymous.

Examples of the kind of third parties we work with are:

- IT companies who support our website and other business systems.
- Operational companies such as delivery couriers.
- Direct marketing companies who help us manage our electronic communications with you.

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Sharing your data with third parties for their own purposes:

We will only do this in very specific circumstances, for example:

- With your consent, given at the time you supply your personal data, we may pass that data to a third party for their direct marketing purposes.
- For fraud management, we may share information about fraudulent or potentially fraudulent activity in our premises or systems. This may include sharing data about individuals with law enforcement bodies.
- We may also be required to disclose your personal data to the police or other enforcement, regulatory or Government body, in your country of origin or elsewhere, upon a valid request to do so. These requests are assessed on a case-by-case basis and take the privacy of our customers into consideration.
- We may, from time to time, expand, reduce or sell AXM Venture Capital Ltd and this may involve the transfer of divisions or the whole business to new owners. If this happens, your personal data will, where relevant, be transferred to the new owner or controlling party, under the terms of this Privacy Notice.
- For further information please contact our Data Protection Officer.

## 11. Where your personal data may be processed

Sometimes we will need to share your personal data with third parties and companies outside the European Economic Area (EEA).

Protecting your data outside the EEA

The EEA includes all EU Member countries as well as Iceland, Liechtenstein and Norway. We may transfer personal data that we collect from you to third-party data processors in countries that are outside the EEA.

For example, this might be required in order to provide support services.

Any transfer of your personal data will follow applicable laws and we will treat the information under the guiding principles of this Privacy Notice.

## 12. What are your rights over your personal data?

An overview of your different rights

You have the right to request:

- Access to the personal data we hold about you, free of charge in most cases.
- The correction of your personal data when incorrect, out of date or incomplete.

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- For example, when you withdraw consent, or object and we have no legitimate overriding interest, or once the purpose for which we hold the data has come to an end.
- That we stop using your personal data for direct marketing (either through specific channels, or all channels).
- That we stop any consent-based processing of your personal data after you withdraw that consent.

You have the right to request a copy of any information about you that AXM Venture Capital Ltd holds at any time, and also to have that information corrected if it is inaccurate. To ask for your information, please contact the AXMVC Data Protection Officer, 57g Randolph Avenue, London W9 1BQ, or email [subject.access.request@admin@axmvc.co.uk](mailto:subject.access.request@admin@axmvc.co.uk). To ask for your information to be amended, please contact [admin@axmvc.co.uk](mailto:admin@axmvc.co.uk)

If we choose not to action your request we will explain to you the reasons for our refusal.

#### Your right to withdraw consent

Whenever you have given us your consent to use your personal data, you have the right to change your mind at any time and withdraw that consent.

#### Where we rely on our legitimate interest

In cases where we are processing your personal data on the basis of our legitimate interest, you can ask us to stop for reasons connected to your individual situation. We must then do so unless we believe we have a legitimate overriding reason to continue processing your personal data.

#### Direct marketing

You have the right to stop the use of your personal data for direct marketing activity through all channels, or selected channels. We must always comply with your request.

#### Checking your identity

To protect the confidentiality of your information, we will ask you to verify your identity before proceeding with any request you make under this Privacy Notice. If you have authorised a third party to submit a request on your behalf, we will ask them to prove they have your permission to act.

### 13. How can you stop the use of your personal data for direct marketing?

Write to the AXMVC Data Protection Officer, 57g Randolph Avenue, London W9 1BQ, or email [subject.direct.marketing.cessation@admin@axmvc.co.uk](mailto:subject.direct.marketing.cessation@admin@axmvc.co.uk).





Please note that you may continue to receive communications for a short period after changing your preferences while our systems are fully updated.

#### 14. Contacting the Regulator

If you feel that your data has not been handled correctly, or you are unhappy with our response to any requests you have made to us regarding the use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office.

You can contact them by calling [0303 123 1113](tel:03031231113).

Or go online to [www.ico.org.uk/concerns](http://www.ico.org.uk/concerns) (opens in a new window; please note we can't be responsible for the content of external websites)

If you are based outside the UK, you have the right to lodge your complaint with the relevant data protection regulator in your country of residence. Details can be found in Section 16.

#### 15. Any questions?

We hope this Privacy Notice has been helpful in setting out the way we handle your personal data and your rights to control it.

If you have any questions that haven't been covered, please contact our Data Protection Officer who will be pleased to help you:

- Email us at [admin@axmvc.co.uk](mailto:admin@axmvc.co.uk)
- Or write to us at Data Protection Officer, 57g Randolph Avenue, London W9 1BQ

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