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General Data Protection Regulation Policy

PEF General Data Protection Regulation Policy

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Scope

This policy applies to all of The 79th Group International Management Limited and all subsidiary companies owned and/or controlled by The 79th Group International Management Limited (the “Company”);

The data protection policy explains how we use any personal information we collect from our clients when our services are used.

What is Personal Data?

Personal data relates to any information about a natural person that makes you identifiable which may include (but is not limited to):

- Names and contact information i.e. emails and telephone numbers
- National Insurance Numbers
- Employment history
- Employee numbers
- Credit History
- Personal tax
- Payroll and accounting data

What is Sensitive Personal Data?

Sensitive personal data refers to the above but includes genetic data and biometric data. For example:

- Medical conditions
- Religious or philosophical beliefs and political opinions
- Racial or ethnic origin
- Convictions
- Biometric data (e.g. photo in an electronic passport)

What is a Data Controller?

For general data protection regulation purposes, the “data controller” means the person or organisation who decides the purposes for which data and how any personal data is processed. The data controller is The 79th Group International Management Limited, whose registered office is at 5-9 Main Street, GX11 1AA, Gibraltar. The data protection officer is Curtis Webster, (Director) who can be contacted at the above address, via email info@79thfund.gi.

What is a Data Processor?

A “data processor” is a person or organisation which processes personal data for the controller.

What is Data Processing?

Data processing is any operation or set of operations performed upon personal data, or sets of it, be it by automated systems or not. Examples of data processing explicitly listed in the text of the Gibraltar General Data Protection Regulations (Gibraltar GDPR) are collection, recording, organising, structuring, storing, adapting, altering, retrieving, consulting, using, disclosing by transmission, disseminating or making available, aligning or combining, restricting, erasure or destruction.

What Do We Mean By Business to Business?

PLC, Limited, LLP incorporated partnerships, trusts and foundations, local authorities and government institutions.

What Do We Mean By Business to Consumer?

Private clients, sole traders, unincorporated partnerships, trusts and foundations.

What Information Do We Collect About You and How?

The 79th Group International Management Limited, as a Data Controller, is bound by the requirements of the Gibraltar GDPR. Clients agree that we are entitled to obtain, use and process the information you provide to us to enable us to discharge the services (as defined in our Letter of Engagement and supporting schedules) and for other related purposes including;

- Updating and enhancing client records
- Analysis for management purposes

- Carrying out credit checks in relation to you
- Statutory returns
- Legal and regulatory compliance
- Crime prevention.

The 79th Group International Management Limited collects information about you when you fill in any of the forms on our website i.e. sending an enquiry, signing up for an event, filling in a survey, giving feedback etc. Website usage information is collected using cookies.

Cookies

Cookies are text files put on your computer to collect standard internet log information and visitor behaviour information. This information is then used to track visitor use of the website and to create statistical reports on website activity. For more information visit www.aboutcookies.org, www.allaboutcookies.org, where you can set your browser not to accept cookies and the above websites tell you how to remove cookies from your browser. Please note in a few cases some of our website features may not function because of this. Further information can be found in our Group Cookies Policy Document.

Analytics

E.g. how visitors use our website. We use Google Analytics to store information about how visitors use our website so that we may make improvements and give visitors a better user experience. Google Analytics is a third-party information storage system that records information about the pages you visit, the length of time you were on specific pages and the website in general, how you arrived at the site and what you clicked on when you were there. These cookies do not store any personal information about you e.g. name, address etc, and we do not share the data. You can view googles privacy policies here: Google - <http://www.google.com/intl/en/policies/privacy>.

IP Addresses

An IP or Internet Protocol Address is a unique numerical address assigned to a computer as it logs on to the internet. The 79th Group International Management Limited do not have access to any personal identifiable information and we would never seek this information. Your IP address is logged when visiting our site, but our analytic software only uses this information to track how many visitors we have from particular regions.

Internet Based Advertising

We use LinkedIn, Facebook and Twitter advertising services. We do not store any personal data within this type of tracking.

How Will We Use The Information About You and Why?

At The 79th Group International Management Limited we take privacy seriously and will only use personal information to provide the services requested from us, detailed in a Letter of Engagement and supporting schedules and as identified above. We will only use this information subject to instruction, data protection law and our duty of confidentiality.

For Business to Business Clients and Contacts our lawful reason for processing your personal information will be “legitimate interests”. Under “legitimate interests” we can process personal information if we have a genuine and legitimate reason and we are not harming any rights and interests.

For Business to Consumer Clients and Contacts our lawful reason for processing personal information will be “A contract with the individual” e.g. to supply goods and services requested, or to fulfil obligations under an employment contract. This also includes steps taken up on request before entering into a contract.

We may receive personal data for the purposes of our money laundering checks, such as a copy of a passport. This data will only be processed for the purposes of preventing money laundering and terrorist financing, or as otherwise permitted by law or with express consent.

Our work may require us to pass your information to a third-party service providers, agents, subcontractors and other associated organisations for the purposes of completing tasks and providing the services to clients on our behalf. However, when third party service providers, we disclose only the personal information that is necessary to deliver the services and we have contracts in place that requires them to keep information secure and not to use it for their own direct marketing purposes. Information collected on our website to process an enquiry, deal with event registration, give advice based on survey data and improve our services. If agreed, we will also use this information to share updates about our services which we believe may be of interest.

We will not share information for marketing purposes with companies so that they may offer their products and services.

Security Precautions in Place About Data Collected

When you are on a secure page, a lock icon will appear on the bottom of web browsers such as Microsoft Internet Explorer.

Non-sensitive details (email address etc.) are sent normally over the Internet, and this can never be guaranteed to be 100% secure. As a result, while we strive to protect your personal information, we cannot guarantee the security of any information you transmit to us, and you do so at your own risk. Once we receive your information, we make our best effort to ensure its security on our systems.

Where we have given (or where you have chosen) a password which enables you to access certain parts of our websites, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

Marketing

We would like to send information about our services which may be of interest to our clients. Where clients have consented to receive marketing, they may opt out at any point as set out below. Clients have a right at any time to stop us from contacting them for marketing purposes. To opt out please email info@79thfund.gi.

How Long Will We Hold Your Data For?

Marketing: We will hold your data for a period of 6 years with a review every 3 years. You will have the opportunity to opt out or update or delete data at any point should you need to do so and details are set out in this policy as to how to do that.

Contracted Services: We will hold your data for 6 years in line with Gibraltar law of data record keeping requirements.

What is a Subject Access Request?

This is a client right to request a copy of the information that we hold about them. Should a client like a copy of some or all of their personal information, an email or written request can be sent to us at the following address: 5-9 Main Street, GX11 1AA, Gibraltar or by emailing info@79thfund.gi and we will respond to you within one month of receipt of the request.

We want to make sure that personal information is accurate and up to date. Clients may ask us to correct or remove information that is inaccurate by emailing info@79thfund.gi or writing to the above address.

Objections to processing of personal data is a client's right to lodge an objection to the processing of personal data if they feel the "ground relating to your particular situation" apply. The only reasons we will be able to deny a request is if we can show compelling legitimate grounds for the processing, which override a client's interest, rights and freedoms, or the processing is for the establishment, exercise or defence of a legal claims.

Data Portability

It is also a client's right to receive the personal data which they have given to us, in a structured, commonly used and machine-readable format and have the right to transmit that data to another controller without delay from the current controller if:

- a. The processing is based on consent or on a contract, and
- b. The processing is carried out by automated means.

Right to be Forgotten

Should a client wish for us to completely delete all information that we hold about them a request should be made via:

- Email: info@79thfund.gi, or
- In writing to: The 79th Group International Management Limited, whose registered office is at 5-9 Main Street, GX11 1AA, Gibraltar.

Other Websites

Our website may contain links to other websites. This privacy policy only applies to our business website, when a link to other websites is used, the user should read privacy policies of the link website.

Complaints

If a client feels that their personal data has been processed in a way that does not meet the Gibraltar GDPR standard, they have a specific right to lodge a complaint with the relevant supervisory authority. The supervisory authority will then notify the client of the progress and outcome of any complaint.

The DPA designates the Authority, as Information Commissioner, to be the supervisory authority in Gibraltar, Data Protection | What We Regulate (gra.gi).

Alternatively you can make a direct complaint to us via post at the below stated address, or via email info@79thfund.gi.

Changes to our Privacy Policy

We keep our privacy policy under regular review, and we will notify clients of any changes. This privacy policy was last updated on 27 March 2024 and is in line with the Gibraltar GDPR guidelines.

How to Contact Us

Any questions about our privacy policy or personal information we hold about can be sent via:

- Email: info@79thfund.gi, or
- In writing to: The 79th Group International Management Limited, 5-9 Main Street, GX11 1AA, Gibraltar.



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Contact Us

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