



### Privacy Statement

This Privacy Policy explains the way that Super-Mezz looks after your personal data when we provide our services and products. This is in accordance with applicable legislation intended to protect your personal data and privacy, including the United Kingdom General Data Protection Regulation (UK-GDPR) and related rules.

The policy applies to personal data information we collect that relates to an identifiable person, how we collect the data, manage it and protect it and what rights individuals have with regard to their personal data.

At the end of this Policy, you will find links to other websites that provide further information to help you. We have also included the contact details of our Data Protection Officer, which you can use to ask us for further information or to exercise your rights.

### What Does The Legislation Entail?

Data protection rules require that the personal data we hold about you should be:

- Used lawfully, fairly and in a transparent way
- Collected only for valid purposes that we have clearly explained to you and not used in a way that is incompatible with those purposes
- Relevant to the purposes we have told you about and limited only to those purposes
- Accurate and kept up to date
- Kept secure and confidential
- Kept only as long as necessary for the purposes we have told you about and in keeping with prevalent legislation.

### How We Collect Information:

We may collect personal information when you use the contact form on our website, apply for or invest in one of our products or services directly or via an intermediary (brokers, professional or financial advisors), contact us by telephone/email, or meet one of our representatives.

If you apply for mezzanine finance from Super-Mezz, our detailed application form covers the information we formally request. If you invest in Super-Mezz opportunities, we will conduct detailed due diligence to cover the information we formally request. But we also collect personal data through day-to-day activities, meeting with potential investors, clients and their intermediaries, our professional networks and through the day-to-day interaction between our employees and their contacts.

### How We Will Use Your Personal Data:

Our services and products mean that we are Data Controllers under the terms of GDPR legislation. Some of the information we receive will come from other Data Controllers and some of the information we share will be with Data Processors.

We take your privacy seriously and will only use your personal data for the following purposes:

**For Investors:**

To evaluate your investment application in Super-Mezz loans, we collect personal information from you as part of our due diligence process. We hold individual data where processing is in our legitimate interest and not overridden by your rights. Our checks with fraud prevention agencies are conducted to mitigate potential risks. This applies to individuals as investors, guarantors, lawyers, or any witnesses to signatures.

In processing your investment application, we may require details of any relevant financial history, including criminal convictions, offences, and director disqualifications. If needed, we will seek your consent to collect such details. Refusal or withdrawal of consent may impact the processing of your application.

Our investment assessment involves reviewing your financial background, relevant experience, and may entail credit searches through third-party providers. We may share this information with our shareholders, finance providers, or other relevant entities, including referees provided by you or previous financial entities involved in your projects or investments.

This information may encompass your personal details such as name, address, contact information, date of birth, identification records, marital status, dependents, and social circumstances. Additionally, we may gather information obtained during business interactions, including employment history, financial standing, assets, liabilities, credit references, and publicly available information.

This data is essential for assessing investment applications, adhering to regulatory requirements such as 'Know Your Customer' and 'Anti-Money Laundering' regulations, and facilitating efficient processing.

Furthermore, we may share your personal data with third-party suppliers for administrative purposes, including solicitors, payment service providers, IT software providers, and quantity surveyors or valuers.

We are subject to regulatory requirements dictating data retention periods and may be obligated to fulfil requests from regulatory bodies or law-related government entities.

Internally, we utilise data for monitoring and administering loan facilities, investments, conducting market research, and managing our business operations efficiently.

Should we need to share personal information for any other purpose, we will seek your explicit consent, providing a clear explanation of the rationale behind it.

We handle your requests and inquiries via email, phone, or in writing as per your instructions.

Additionally, we may provide you with information about Super-Mezz's products and services through marketing communications. You have the option to opt-out of receiving further marketing materials at any time through the provided opt-out link in our emails or by contacting our Data Protection Officer.

For any queries or concerns regarding data protection, please contact our Data Protection Officer.

**For Borrowers:**

**To assess your application for finance.**

If you have applied for mezzanine finance from us, we collect personal information from you because we need it to decide whether to make a loan to you. We hold individual data where the processing is in our legitimate interest and not overridden by your rights. Our checks with fraud prevention agencies are undertaken to prevent fraud. This applies to individuals as borrowers, guarantors, powers of attorney or any witnesses to signatures.

To process your application, we may require details of any criminal convictions, offences and director disqualifications. If we do, then we will ask for your consent to collect these details. If you do not wish to give your consent or, once given, you withdraw that consent, we will not be able to process your application further.

Our loan assessment includes a review of your financial position, relevant personal experience and an application to third-party providers for credit search purposes. We may share this information with our shareholders or other entities that provide us with finance or with third-party referees you have supplied us with or with other financial entities that have provided you with finance on prior projects or the project currently applied for.

This information may include your name, personal and correspondence address, telephone numbers, email addresses, date of birth (so that we can make sure that our services and products are appropriate and carry out financial checks), personal identification records (such as driving licence, or passport, residency status confirmation), marital status, dependents or social circumstances.

We may also gather information about individuals in the course of business through meetings, correspondence or conversations, your employment history, salary or financial standing, assets and liabilities, savings or other sources of income and liabilities, credit reference data as well as other information publicly available.

This is necessary both for Super-Mezz to assess the application for our services and products as well as to comply with the 'Know Your Customer' and 'Anti-Money Laundering regulations.

This also includes any third party to whom we may transfer the benefit of all or part of our interests in any loan/investment made, including group companies of such a third party; other organisations which might assist us in processing your application or administering your loan/investment; any insurance company/local authority to which you may make an application for a guarantee with this loan; your solicitor, financial adviser, any organisation that introduced you to us and any other of your professional advisers; the person who values any property which is security for the mortgage/loan/investment; the Quantity Surveyors we employ to assess the costs of projects, any other lender with who also hold a charge on the security and other persons who we, in our absolute discretion, consider necessary for the efficient processing of your application.

The information will be used by us to evaluate an application for finance as part of a full review of your application. This applies whether the application has been made directly through our Business Development Managers/ Directors, via brokers or other intermediaries (who may themselves have carried out some of these checks already under their own application of the rules).

**To administer your account or investment, perform our contract with you and to provide you with the products and services you have requested from us.**

This includes administration and management of your account or investment, updating your records, contacting you or tracing your whereabouts for the purpose of recovering our debt or returning your investment.

We may have to share your personal data with certain third-party suppliers such as solicitors, payment service providers, shareholders or other entities or individuals/investors that provide us, or are looking to provide us, with finance or you with finance current and potential, any other lender with who also hold a charge on the security, potential borrowers and/or developers, IT Software or

document storage providers, Loan Management suppliers or back office functions, our appointed Quantity Surveyors or valuers or any other persons who we, in our absolute discretion, consider necessary for the efficient management of your loan facility or investment. Overlaying this is the regulatory environment which controls how long we need to keep personal information on our files and any request made of us or required for us to make from regulatory, tax or law-related Government bodies or legislation (examples are: HMRC, the Information Commissioner's Office, our accountants, solicitors and auditors). This includes identity checks, Know Your Customer, Anti-Money Laundering checks, and checks with Fraud Prevention Agencies pre-application, at the application stage and periodically thereafter, as required. Internally, we will monitor and administer loan and investment facilities, carrying out market research, analysis and statistical management of our market, either directly or through companies helping us to develop our marketing and services. Information will be shared amongst our other companies so that we can manage our business in a coordinated manner. If we need to share personal information for any other purpose, we will first seek your authority to do so with a clear explanation of why.

#### To deal with your requests and enquiries.

By email, by phone (including voicemail) or in writing as directed by you.

#### To provide you with information about products and services offered by Super-Mezz (marketing).

We would like to keep you informed of Super-Mezz's products and services and investment opportunities in line with the relevant services and products for which you have contacted us or used previously. This will be mostly by email, and occasionally in writing or by phone. You can opt-out at any point from receiving further marketing from Super-Mezz using the opt-out link which appears on all of our marketing emails. Or you can notify our Data Protection Officer (see contact below) who will arrange for you to be unsubscribed from future marketing.

#### As an employer.

We need to keep detailed files on our employees, past and present. We may need to share personal information with HMRC, other Government agencies, companies supplying us with personal management systems, pension providers or future employers. Details include name, salaries, employment dates, address, and date of birth, vehicle details, tax codes, bank account details, pension records, performance reviews, medical and next of kin information.

#### We do not sell personal information collected through our website or through our day-to-day activities.

#### How Have We Obtained Your Personal Information

Our products and services are delivered through our staff in the head office, through our regional representatives, through professional intermediaries (including brokers, solicitors, valuers, quantity surveyors and professional advisors) and through our website.

The information we collect can come directly from an individual. When a broker or other intermediary processes your personal data on our behalf, this privacy policy applies. When a broker or intermediary processes your personal data in their own right, their policy applies, and you should request their policy.

#### Website

Our website uses cookies. A cookie is a small file of letters and numbers that we put on your computer. These cookies allow us to distinguish you in an anonymous form from other users of our website.

The only cookies we use are "analytical" cookies, which allow us to recognise and count the number of visitors we get and to see how our visitors view our site and which content they are viewing. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily.

You may delete and block all cookies from the sites, by activating the setting on your browser that allows you to refuse the setting of all or some cookies, but you may not be able to access all or parts of our website.

You can find more information about cookies on these useful websites:

[www.google.com/analytics/learn/privacy.html](http://www.google.com/analytics/learn/privacy.html)

[en.wikipedia.org/wiki/HTTP\\_cookie](http://en.wikipedia.org/wiki/HTTP_cookie)

[www.aboutcookies.org](http://www.aboutcookies.org)

#### How Long Do We Keep Information For

Your personal data will be kept as required by law. We currently keep loan transaction and investor information for 7 years. This includes the application forms, ID and anti-money laundering credit agreements as well as the history of the facility. Employee information is kept for 20 years.

#### How We Keep Your Information Safe

We operate a tidy desk policy and continue to educate our employees on the safekeeping of data. We securely archive files once a loan is repaid and shred any other paper-based information on a regular basis.

Information saved on our server is password protected.

We change our passwords regularly and share information with third parties securely.

#### Amendments

We may update this policy from time to time by publishing a new version on our website.

You should check this page occasionally to ensure you are happy with any changes to this policy.

#### Your Rights

If you wish to access, correct, update or request the deletion of your personal information, you can do so at any time by contacting us using the contact details provided below.

You can object to the processing of your personal information, ask us to restrict the processing of your personal information or request portability of your personal information using the contact details provided below.

You have the right to opt out of marketing communications we send you at any time. You can exercise this right by clicking on the “unsubscribe” or “opt-out” link in the marketing emails we send you. To opt out of other forms of marketing (such as postal marketing or telemarketing), please contact us using the contact details below.

Similarly, if we have collected and processed any information on the basis of your consent (such as information about any criminal record), then you can withdraw your consent at any time.

Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect the processing of your personal information conducted in reliance on lawful processing grounds other than consent.

You have the right to complain to a data protection authority about our collection and use of your personal information. For more information, please contact your local data protection authority.

#### How to contact us

If you have any questions or concerns about our use of your personal information, please contact us using the following details: [Charlotte Dunn, Data Controller, Super-Mezz Ltd, 71-75 Shelton Street, Covent Garden, London, United Kingdom, WC2H 9JQ](#) or email: [contact@super-mezz.co.uk](mailto:contact@super-mezz.co.uk)