



CIBUS CAPITAL

Cibus Capital LLP ("Cibus Capital")

Website Privacy Policy

The protection of your privacy is important to us. We are committed to respecting the confidentiality of the personal information you supply to us and all such information will be processed in accordance with applicable data privacy laws.

This Privacy Policy describes the types of personal information we may collect from you as a visitor and user of www.cibusfund.com (the "**Website**"), how we use the information, with whom we may share it and the choices available to you regarding our use of the information.

1. Information you give us

The type of information we may collect on the Website includes:

- personal and business contact information (such as name, postal and email address, and telephone number);
- other personal information you may submit to us via the Website; and
- aggregated data such as statistical or demographic data. Aggregated data could be derived from your personal data but is not considered personal data in law as this data will not directly or indirectly reveal your identity.

If you are a potential investor in a fund advised by Cibus Capital (a "**Cibus Fund**"), we may ask that you provide personal information, including:

- personal and business contact information (such as name, postal and email address, and telephone number);
- details of your agents;
- information on the amount you wish to invest; and
- information on your financial status required for client categorisation purposes.

For potential investors which are legal entities, the personal information we collect will relate to the contact persons of such entities. As acknowledged in the click through disclaimer of the Website, the Website and this Privacy Policy do not constitute an offer to subscribe for any interest in Cibus Funds. Any such investments are suitable only for institutional investors and financially sophisticated individuals who have taken appropriate professional advice and who have the financial ability to bear the risk involved.

In the course of a business relationship with you, we may collect the following types of information:

- personal and business contact information (such as name, postal and email address, and telephone number);
- "know your client" information (such as copy passports, driving licences and utility bills, date and place of birth); and
- information that we receive from other sources, such as third parties who collect personal information from you and pass it on to us (for example, where we conduct verification or antimoney laundering checks as part of our AML policies and procedures).



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We do not collect any special categories of personal data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

2. Information we collect automatically

We may use third party technology, such as Google Analytics and Mailchimp, to provide us with information about how you use this website. This may include the use of cookies to collect anonymous information, including the number of visitors to this website, where they have come to this website from, the pages they visit and the length of time they have spent on this website. We may use this information to compile statistics and to help us to improve our website and the services we offer. Google's privacy policy is available at <http://www.google.com/policies/privacy> and Mailchimp's privacy policy is available at <https://www.intuit.com/privacy/statement/>.

3. How do we use your personal information?

We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances:

- to provide a requested service or to perform a contract we have entered into with you;
- where we need to comply with a legal obligation;
- where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests; and
- where we have your consent.

More specifically, we may use the personal information described above for the following purposes:

- where agreed by you, to send you promotional materials and other communications and in certain circumstances where we have a legitimate interest in sending you such material by virtue of our business relationship with you and you have not objected to this;
- to respond to your enquiries in our legitimate interest;
- to perform data analyses in our legitimate interest;
- to send you our Venture Capital newsletter;
- to operate, evaluate and improve our business in our legitimate interest;
- to communicate with you in our legitimate interest regarding a potential investment in a Cibus Fund;
- to identify and prevent fraud and other illegal activities in our legitimate interest and in some circumstances where we have a legal obligation to do so; and
- to enforce and comply with legal rights and obligations.

We may also use the information described above in other ways for which we provide specific notice at the time of collection.



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4. How long do we keep your personal information for?

We only retain your information for as long as is necessary for us to use your information as described above, where it is in our legitimate interest, or to comply with our legal obligations. Please be advised that we may retain some of your information after we cease our relationship with you, for instance if this is necessary to meet our legal obligations, such as retaining the information for tax and accounting purposes or to comply with financial services regulations.

When determining the relevant retention periods, we will take into account factors including:

- our contractual obligations and rights in relation to the information involved;
- legal obligation(s) under applicable law to retain data for a certain period of time;
- our legitimate interest;
- statute of limitations under applicable law(s);
- (potential) disputes;
- if you have made a request to have your information deleted; and
- guidelines issued by relevant data protection authorities.

Otherwise, we securely erase your information once this is no longer needed.

5. Who do we share your personal information with?

Business processes

In connection with our day-to-day business processes, we share your personal information with third parties who perform functions on our behalf and who also provide services to us, such as professional advisors, our administrators and IT consultants. These third parties comply with similar and equally stringent undertakings of privacy and confidentiality.

Establishing a fund

Personal information relating to potential investors in Cibus Funds (and their representatives) will be shared with third parties who provide services to us in connection with the establishment of the fund, such as administrators, professional advisors and placing agents. These third parties comply with similar and equally stringent undertakings of privacy and confidentiality.

Sharing with group members and affiliates

We may share your personal information amongst our group members and affiliates in connection with the provision of services to you, for fund management purposes or for internal reasons, such as for business and operational purposes. Our group members and affiliates will only use your personal information for the purposes described in this privacy policy.

Third-party links

This website and our Venture Capital newsletter may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website or click on any links in our Venture Capital newsletter, you do so at your own risk we encourage you to read the privacy policy of every website



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you visit. The provision of these links by Cibus does not constitute authorisation or sponsorship of an endorsement by, or an affiliation with such sites by Cibus. The content of these external sites to which a link has been provided has not been developed, checked for accuracy or otherwise reviewed by Cibus. Cibus does not accept responsibility for the content or the use of the sites or pages linked on this website or in the Venture Capital newsletter and Cibus does not accept responsibility for damages or losses that may occur as a result of such links or their content.

6. What are your rights?

By law, you have a number of rights when it comes to your personal information. Please contact us using the contact details below to exercise any of your rights. Please note that these rights are not without restriction and may not apply in all circumstances.

The right to object processing

You have the right to object to certain types of processing, including processing for direct marketing (i.e. if you no longer want to be contacted with potential opportunities). In relation to our Venture Capital newsletter, you are able to unsubscribe at any time by following the "unsubscribe" link at the bottom of any newsletter.

The right to be informed

You have the right to be provided with clear, transparent and easily understandable information about how we use your information and your rights. This is why we're providing you with the information in this Policy.

The right of access

You have the right to obtain access to your information (if we're processing it), and certain other information (similar to that provided in this Privacy Policy). This is so you're aware and can check that we're using your information in accordance with data protection law.

The right to rectification

You are entitled to have your information corrected if it's inaccurate or incomplete.

The right to erasure

This is also known as 'the right to be forgotten' and, in simple terms, enables you to request the deletion or removal of your information where there's no compelling reason for us to keep using it. This is not a general right to erasure; there are exceptions.

The right to restrict processing

You have rights to 'block' or suppress further use of your information. When processing is restricted, we can still store your information, but may not use it further. We keep lists of people who have asked for further use of their information to be 'blocked' to make sure the restriction is respected in future.

The right to data portability

You have rights to obtain and reuse your personal information for your own purposes across different services. For example, if you decide to switch to a new provider, this enables you to move, copy or transfer your information easily between our IT systems and theirs safely and securely, without affecting its usability.



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The right to lodge a complaint

Please direct any such feedback to our Chief Compliance Officer, Jeremy Alun-Jones (Jeremy.Alunjones@cibuscap.com).

You have the right to lodge a complaint about the way we handle or process your personal information with the ICO, or if you are based outside of the UK, you may instead contact your national data protection regulator. We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

The right to withdraw consent

If you have given your consent to anything we do with your personal information, you have the right to withdraw your consent at any time (although if you do so, it does not mean that anything we have done with your personal information with your consent up to that point is unlawful). This includes your right to withdraw consent to us using your personal information for marketing purposes.

7. Contacting Us

If there are any questions regarding this privacy policy, you may contact us using the information below.

Jeremy Alun-Jones
Cibus Capital LLP
4 Sloane Square
London
SW1X 9DQ

Last edited on 30 January 2024