

iAMCAPITAL

IAM CAPITAL PRIVACY POLICY

2026



iAM Capital Group Ltd and IAM Invest Ltd – Privacy Policy

iAM Capital Group Ltd and iAM Invest Ltd (collectively “IAM”) are committed to protecting your personal data and your privacy). We process personal data in accordance with applicable data protection legislation, including the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018 (DPA), together with any applicable amendments, replacements or supplementary legislation. The terms Personal Data, Data Controller and processing have the meanings given to them in the GDPR unless otherwise indicated.

1. Scope

This Privacy Policy demonstrates how IAM handles the Personal Data you provide to us:

- by your interacting with us as a prospective, current or former client and/or in connection with ongoing services we are providing to you or your organisation;
- by your using or submitting information to us through our internet website www.iamcapital.com;
- by your subscribing to our newsletter or email lists;
- by your inquiring about or applying for a job with IAM; and
- by your inquiring about specific business or investment opportunities.

2. Identity and Contact Details of Data Controller

For the purposes of the DPA and the UK GDPR, IAM is the controller of your data. If you have any queries regarding this policy or complaints about our use of your data, please contact us at the address below and we will do our best to deal with your complaint or query as soon as reasonably practicable.

iAM Capital Group Ltd

4 Hill Street

London

W1J 5NE

United Kingdom

FAO: Data Processing

3. Your Data

Where we collect personal data relating to you, such data may include, without limitation, the following categories of information:

- your name;
- your contact details, consisting of professional / work telephone / mobile number, email address and office address;
- your home address where relevant to or necessary for our compliance obligations or adherence to industry practice;
- details relating to the history and nature of your relationship with us;
- your job title or professional position;
- the name of your employer or the organization with which you are affiliated;

- information concerning your investment preferences, investment strategy, or sector focus ; and
- information you provide to us or which we obtain from public sources in connection with “Know Your Client” and related requests or other regulatory or compliance-related enquiries.

In limited circumstances, we may also process information relating to criminal convictions or offences, where such information has been disclosed to us by you in the course of our dealings with you or where the processing of such information is necessary in order to comply with applicable legal or regulatory obligations.

We do not ordinarily collect or process special category personal data (including, without limitation, data relating to ethnicity, racial origin, religious or philosophical beliefs, health or other similar sensitive matters), unless such processing is required or permitted by applicable law.

4. What We Use Your Data For

We may process your personal data for the purposes set out below. The legal basis on which we rely for such processing will depend on the relevant circumstances and may include the performance of a contract, compliance with legal obligations, our legitimate interests, or your consent.

- To provide services to you.
- We are unable to provide services to you unless you disclose personal data to us. That may include the services set out in our Engagement Letter with you or subscription documents which you sign, the provision to you of our Newsletter or our response to any enquiry you have submitted. The legal basis for such processing is the performance of a contract with you, or taking steps at your request prior to entering into a contract, together with our legitimate interests in operating and administering our business.
- To contact you in connection with potential investments, business partnerships, joint ventures. The legal basis for such processing is our legitimate interests, namely the development and maintenance of our business relationships and commercial activities.
- Where you apply for a position with us, we may process your personal data in order to assess your suitability for employment or other professional engagement. The legal basis for such processing is our legitimate interests in recruiting and selecting appropriate candidates for roles within our organization.
- We may process and disclose personal data where necessary in order to comply with applicable legal or regulatory obligations, including responding to requests for information from governmental authorities, regulators or other competent bodies. In particular, we may be required to disclose information to the Financial Conduct Authority or other regulatory authorities in connection with our regulated activities. The legal basis for such processing is compliance with a legal obligation and, where applicable, our legitimate interests in ensuring compliance with applicable regulatory requirements.
- We may process your personal data in order to keep you informed about activities undertaken by us which we believe may be of interest to you, including by sending newsletters or other marketing communications by email or post. Where required by applicable law, we will obtain your consent before sending you electronic marketing communications. You may withdraw your consent or opt out of receiving such communications at any time.

- We may process certain personal data through the use of technologies such as cookies and pixel tags in order to operate, maintain and improve our website and related services. These technologies may enable us to recognise returning users, understand how visitors interact with our website, and improve the functionality and user experience of our website.

5. How We Secure Your Data

We recognise the need to ensure that your data remains secure.

We maintain appropriate technical and organisational security measures designed to safeguard the personal data under our control. These measures are intended to protect personal data against accidental or unlawful destruction, loss, alteration, unauthorised disclosure or access. Our security measures include the use of a hardware firewall to prevent unauthorised access. You acknowledge that although we exercise adequate care and security there remains a risk that information transmitted over the Internet and stored by computer may be intercepted or accessed by an unauthorised third party.

Our data protections controls include the following processes:

- password/access controls over all firm devices to ensure that they are only accessed by IAM staff; and
- routine and periodic back-ups to on-line suppliers and to external storage media, in each case with data protection and security features that meet or exceed applicable standards. The latter are held securely off site.

6. Who We Share Your Data With

Please note that we may on occasion be required to share your information with the following categories of recipients:

- Third parties who perform services on our behalf, including providers of information technology services, cloud storage services, data hosting services, marketing platforms and other administrative or operational support services. Such third parties act as data processors on our behalf and are permitted to process personal data only in accordance with our instructions. We take reasonable steps to ensure that such service providers maintain appropriate technical and organizational security measures to protect personal data and process such data in accordance with applicable data protection laws. Where required by applicable law, these service providers are subject to appropriate data processing agreements governing the processing of personal data on our behalf.
- In relation to any other third parties, we will only disclose your information in the following circumstances:
 - where you have given your consent;
 - where we are required to do so by law or enforceable request by a regulatory body;
 - where it is necessary for the purpose of, or in connection with legal proceedings or in order to exercise or defend legal rights; and
 - in connection with a merger, acquisition, corporate restructuring, sale of assets, or other transfer of all or part of our business.

7. International Transfers

In the course of our business operations, it may be necessary for us to transfer personal data to recipients located outside the United Kingdom. In such circumstances, the destination jurisdiction may not provide the same level of protection for personal data as that afforded under the UK GDPR and the Data Protection Act 2018.

Where personal data is transferred outside the United Kingdom, we will ensure that such transfers are carried out in accordance with applicable data protection legislation and that appropriate safeguards are implemented in order to ensure an adequate level of protection for the personal data concerned.

Such safeguards may include, where appropriate:

- transfers to jurisdictions which have been recognised by the UK Government as providing an adequate level of protection for personal data;
- the implementation of standard contractual clauses or other approved contractual mechanisms governing the transfer and processing of personal data;
- transfers made in reliance on recognised international data transfer frameworks; or
- reliance on other lawful transfer mechanisms recognised under applicable data protection legislation.

In circumstances where personal data is transferred to organisations established in the United States, such transfers may, where applicable, be carried out in reliance on recognised international data transfer frameworks, including the EU-U.S. Data Privacy Framework and, where applicable, the UK Extension to the EU-U.S. Data Privacy Framework, provided that the recipient organisation has certified its participation in the relevant framework.

In certain circumstances, personal data may also be processed by third-party service providers located outside the United Kingdom who provide services to us, including providers of information technology infrastructure, cloud storage, data hosting, marketing platforms and other operational or administrative support services.

For example, we may use third-party providers to distribute marketing communications or newsletters to individuals who have subscribed to receive such communications. Where such providers process personal data outside the United Kingdom, we will take appropriate steps to ensure that adequate safeguards are in place to protect personal data and that such processing is carried out in accordance with applicable data protection legislation.

8. Retention Period

We will retain personal data only for as long as is necessary to fulfil the purposes for which it was collected, including for the purposes of satisfying any applicable legal, regulatory, tax, accounting or reporting requirements.

In determining the appropriate retention period for personal data, we take into account the nature and sensitivity of the personal data concerned, the potential risk of harm resulting from unauthorised use or disclosure of such data, the purposes for which we process the personal data, and whether those purposes can be achieved through other means, together with any applicable legal or regulatory requirements.

Once personal data is no longer required for the purposes for which it was collected, and we are not required to retain it by applicable law or regulation, we will take reasonable steps to ensure that such data is securely deleted or anonymised.

Where personal data is processed for the purposes of sending marketing communications, such data will generally be retained until you withdraw your consent or otherwise opt out of receiving such communications, unless applicable law requires that the data be retained for a longer period.

9. Your Right In Relation to Your Data

Under the UK GDPR, you will have the following rights in relation to how we process your data:

- Right to request access – you may obtain confirmation from us as to whether or not your data is being processed and, where that is the case, access to your data.
- Right to rectification and erasure – you have the right to obtain rectification of inaccurate personal data we hold concerning you and to obtain the erasure of your data without undue delay in certain circumstances.
- Right to restriction of processing or to object to processing – you may require us to restrict the processing we carry out on your data in certain circumstances or to object to us processing your data.
- Right to data portability – you have the right to receive your data in a structured, commonly used and machine-readable format.
- Right to withdraw consent – where you have provided your consent to us processing your data, you have the right to withdraw your consent at any time. This can be done by contacting us at the above address at any time or by clicking the “unsubscribe” link on any marketing communications you receive from us.
- Right to lodge a complaint – you may lodge a complaint with the Information Commissioner’s Office.
- For further information on your rights, please see the Information Commissioner’s website here.

10. Additional Information

There is no statutory or contractual requirement for you to provide your data to us and you are not obliged to do so. Please note, however, that we may not be able to provide you with the services you have requested if you do not provide your contact details. As set out in our cookies policy, our website may not be able to function fully if you do not agree to certain cookies being set on your computer.

We do not undertake automated decision-making or profiling on your data.

We keep our privacy policy under constant review and may change it from time to time to reflect our practices or to remain compliant with relevant legislation. We will notify you of any material changes to our privacy policy via a notification on our website. Your continued use of this website or our other marketing services, following the posting of changes to these terms, will mean you accept these changes.

If you have any questions about this Privacy Policy or about how we process your personal data, or if you wish to exercise any of your rights under applicable data protection legislation, please contact legal@iiamcapital.com

11. Links

Our website may contain links to other websites belonging to third parties. We do not control the privacy practices of these other websites.