



MELANA CAPITAL LIMITED DATA PRIVACY POLICY

Melana Capital Limited is registered under the Data Protection Act.

General Statement of Melana Capital Limited Duties and Scope:

Melana Capital Limited obtains relevant business data regarding Investment Managers and Investors as part of its operation and shall take all reasonable steps to do so in accordance with this Policy.

Melana Capital Limited is not required to appoint a Data Protection Officer (DPO) as an organisation but will endeavour to ensure that all data is processed in compliance with this Policy and the Principles of the Data Protection Act 1998.

Melana Capital Limited recognises The General Data Protection Regulation (GDPR) (Regulation (EU) 2016/679) and your data protection rights under the regime.

The Principles

Melana Capital Limited shall so far as is reasonably practicable comply with the Data Protection Principles (the Principles) contained in the Data Protection Act to ensure all data is: -

- Fairly and lawfully processed
- Processed for a lawful purpose
- Adequate, relevant and not excessive
- Accurate and up to date
- Not kept for longer than necessary
- Processed in accordance with the data subject's rights
- Secure
- Not transferred to other countries without adequate protection

Definitions

Personal Data

The data held by Melana Capital Limited is held within a contacts database within a Customer Relationship Management tool, which is held on Microsoft One Drive. The contact information held is business contacts, with whom we have an existing ongoing relationship, for example, contact names, telephone number, email, website, LinkedIn as provided from business cards or from existing contractual agreements.

There is a field within the contacts database to record if the contact would want to receive a newsletter or other correspondence from Melana Capital Limited, we respect their decision if they choose not to be signed up, or unsubscribe, and we keep our mailing lists separate from our client lists.



Processing of Personal Data

Consent may be required for the processing of personal data unless processing is necessary for the performance of the contract of employment. Any information which falls under the definition of personal data and is not otherwise exempt, will remain confidential and will only be disclosed to third parties with appropriate consent.

Sensitive Personal Data

Melana Capital Limited will review any sensitive personal data held which will be included in an impact risk assessment.

Rights of Access to Information

Data subjects have the right of access to information held by Melana Capital Limited, subject to the provisions of the Data Protection Act 1998

Exemptions

Certain data is exempted from the provisions of the Data Protection Act which includes the following: -

- National security and the prevention or detection of crime
- The assessment of any tax or duty
- Where the processing is necessary to exercise a right or obligation conferred or imposed by law upon Melana Capital Limited, including Safeguarding and prevention of terrorism and radicalisation

The above are examples only of some of the exemptions under the Act. Any further information on exemptions should be sought from the ICO.

Accuracy

Melana Capital Limited will endeavour to ensure that all data held in relation to all data subjects is accurate. Data subjects must notify the data processor of any changes to information held about them. Data subjects have the right in some circumstances to request that inaccurate information about them is erased. This does not apply in all cases, for example, where records of mistakes or corrections are kept, or records which must be kept in the interests of all parties to which they apply.

Data Security

Melana Capital Limited will take appropriate technical and organisational steps to ensure the security of data.

All staff will be made aware of this policy and their duties under the Act.

An appropriate level of data security must be deployed for the type of data and the data processing being performed. In most cases, data must be stored in appropriate systems and be encrypted when transported offsite. Other data may therefore have a lower requirement for data security.



External Processors

Melana Capital Limited must ensure that data processed by external processors, for example, Consultants, Cloud services including storage, web sites etc. are compliant with this policy and the relevant legislation.

Secure Destruction

When data held in accordance with this policy is destroyed, it must be destroyed securely in accordance with best practice at the time of destruction.

Retention of Data

Melana Capital Limited may retain data for differing periods of time for different purposes as required.

Cookies

Melana's website does not use Google Analytics tracking cookies that record the IP address or other personal details.

Changes to this notice

Melana Capital Limited will need to update its privacy notice in response to regulatory requirements or changes to its business. The latest notice will always be available on the Melana website <http://www.melanacapital.com/>