



1 Introduction

Lion's Head Group Limited ("Lion's Head" "we" "us" or "our") and all its subsidiaries are committed to protecting and respecting your privacy. This Privacy Notice (and any other documents referred to in it) sets out the basis on which any personal data we collect from you, or that you provide to us, will be collected, processed and protected by us. [Download a pdf version of the Privacy Notice here.](#)

Lion's Head takes data privacy very seriously. We endeavour to maintain the highest standards of confidentiality, and to respect the privacy of our clients and associated persons, our employees, and other individuals whose personal information we collect and process. We recognise and value the trust that individuals and organisations place in us when providing us with personal data and we are committed to safeguarding the privacy and security of personal data we may collect from visitors to our websites and/or the clients to whom we provide financial and other services, being transparent about the nature and extent of that processing, and the rights that may be available to you with respect thereto.

To the extent that the UK General Data Protection Regulation and/or any other data protection laws apply, this Privacy Notice provides you with transparent and detailed information relating to the protection of your personal data by Lion's Head and its subsidiaries. We are responsible, as a controller, for collecting and processing your personal data in relation to our activities. This Privacy Notice helps you understand the purposes for which personal data is collected and used, how the data is used and disclosed, how long it is kept, and the controller's legal basis for processing.

Please take the time to read this Privacy Notice and if you have any questions about the policy, or our use of your information, contact us via the details provided in section 13 below. This Privacy Notice may change from time to time and if it does, the up-to-date version will always be available on the Lion's Head website (www.lhgp.com). Please note that by continuing to use the Lion's Head website, you are agreeing to any updated versions of the Lion's Head Privacy Notice.

2 Who are we and what we do?

Lion's Head is frontier and emerging market-focused investment bank. We operate across multiple jurisdictions with offices in London, Nairobi, Lagos, Dubai, New York and Amsterdam. The guidance set out in this Notice applies to Lion's Head Group Limited and its two principal subsidiaries, Lion's Head Global Partners18 Ltd ("LHGP18") and LHGP Asset Management 18 Ltd ("LHGP AM") (together "LHGP", the "Group" or the "Firm"). Both subsidiaries are registered in London, UK, regulated by the Financial Conduct Authority ("FCA"), and registered as data controllers with the UK Information Commissioner's Office ("ICO"). This Privacy Notice applies to all of those subsidiaries and affiliated companies, irrespective of location or jurisdiction. If you would like to know which entity/ies within the Group process your personal data, please contact us via the details provided in section 13 below.

This Privacy Notice (and any other documents referred to on it) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Personal data means information about you from which we can identify you (either on its own, or by piecing it together with other information).

This Privacy Notice, however, does not apply to any website, application, product, software, service, or content that are offered by third parties, or that link to their own privacy statement, privacy policy, or privacy notice.



3 Data Controller

The data controller (as defined under UK GDPR) for Lion's Head is LHGP18. LHGP18 is registered as a data controller with the ICO, registration number ZB089168. You have the right to make a complaint at any time to the ICO, the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO, so please contact us in the first instance via the details provided in section 13 below.

4 What personal data we collect about you

We may collect and process different types of personal data in the course of operating our business and providing our services. These include:

- Basic personal details such as your name and job title;
- Contact data such as your telephone number and postal or email address;
- Financial data such as payment related information or bank account details;
- Demographic data such as your address, preferences or interests;
- Website usage and other technical data such as details of your visits to our websites or information collected through cookies and other tracking technologies;
- Personal data provided to us by or on behalf of our clients or generated by us in the course of providing our services, which may, where relevant, include special categories of personal data;
- Identification and other background verification data such as a copy of passports or utility bills or evidence of beneficial ownership or the source of funds to comply with client due diligence / "know your client" (KYC) / anti-money laundering (AML) laws and collected as part of our client acceptance and ongoing monitoring procedures;
- Recruitment related data such as your curriculum vitae, your education and employment history, details of professional memberships and other information relevant to potential recruitment to Lion's Head;
- Data that you may provide to us in course of registering for and attending events or meetings, including access and dietary requirements; and
- Any other personal data relating to you that you may provide.

Where permitted by law or to fulfil our regulatory requirements, we may process information about criminal convictions or offences and alleged offences for specific and limited activities and purposes, such as to perform checks to prevent and detect crime and to comply with laws relating to money laundering, fraud, terrorist financing, bribery and corruption, and international sanctions. It may involve investigating and gathering intelligence on suspected financial crimes, fraud and threats and sharing data between banks and with law enforcement and regulatory bodies.

5 How we obtain personal data about you

We may collect or receive your personal data in a number of different ways:

- Where you provide it to us directly, for example by corresponding with us by email, or via other direct interactions with us such as completing a form on our website;
- Where we monitor use of, or interactions with, our websites, any marketing we may send to you, or other email communications sent from or received by Lion's Head;
- Third party sources, for example, where we collect information about you to assist with "know your client" checks as part of our client onboarding procedures or where we receive information about you from recruitment agencies for recruitment purposes; or

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- Publicly available sources (we may, for example, use such sources to help us keep the contact details we already hold for you accurate and up to date or for professional networking purposes, e.g. LinkedIn).

In certain circumstances, we may collect information from you about individuals who do not have a direct relationship with us. This may happen, for instance, when you provide us information about your:

- staff (employees, contractors, consultants);
- family members;
- successors and rights holders;
- co-borrowers / guarantors;
- legal representatives (power of attorney);
- beneficiaries;
- ultimate beneficial owners;
- debtors; and
- company shareholders.

When you provide us with third party personal data (included but not limited to those listed above), you confirm that such third party receives this Privacy Notice and understands the information in this Privacy Notice about how we will use their personal data.

We may also obtain personal data from:

- other Group entities
- our clients
- our business partners
- third parties such as credit reference agencies and fraud prevention agencies or data brokers which are responsible for making sure that they gather the relevant information lawfully;
- publications/databases made available by official authorities or third parties (i.e. databases operated by financial supervisory authorities);
- websites/social media pages of legal entities or professional clients containing information made public by you (i.e. your own website or social media); and
- public information such as information from the press.

6 How we use your personal data

We will only use your personal data where we are permitted to do so by applicable law. Under applicable data protection law, the use of personal data must be justified under one of a number of legal grounds. The principal legal grounds that justify our use of your personal data are:

- Contract performance: where your information is necessary to enter into, or perform our contracts as well as to manage our relationship with you.
- Legal obligation: where we need to use your information to comply with our legal and regulatory obligations, including financial regulations.
- Legitimate interests: where we use your information to achieve a legitimate interest and our reasons for using it outweigh any prejudice to your data protection rights.
- Legal claims: where your information is necessary for us to defend, prosecute or make a claim against you, us or a third party.
- Consent: where, for certain types of personal data processing, you have consented to our use of your information (you will have been presented with a consent form or facility in relation to any such use and may withdraw your consent through an unsubscribe or similar facility).



We may use your personal data in the following ways:

- To provide our asset management, financial advisory and other services to you and to conduct our business, including to carry out our obligations arising from any agreements entered into between you and us;
- To facilitate use of our websites, to ensure content is relevant, to respond to requests for information or enquiries from visitors to our websites and to ensure that content from our websites is presented in the most effective manner for you and for your device;
- For marketing and business development purposes, to provide you with details of new services, news updates and invites to webinars, seminars and events where you have chosen to receive these.
- For business development purposes in order to better understand your and our clients' services and marketing requirements and to better understand our business and develop our services and offerings;
- For recruitment purposes so we can process applications for employment submitted via the Careers section of our website, or through other means, and to assess your suitability for any position for which you may apply at Lion's Head;
- To fulfil our legal, regulatory, or risk management obligations by complying with our legal obligations (performing client due diligence/"know your client", anti-money laundering, anti-bribery, sanctions or reputational risk screening, identifying conflicts of interests);
- For the prevention of fraud and/or other relevant background checks as may be required by applicable law and regulation and best practice at any given time; to enforce our legal rights, to comply with our legal or regulatory reporting obligations and/or to protect the rights of third parties;
- To ensure that we recover any payments due to us and where necessary to enforce such recovery through the engagement of debt collection agencies or taking other legal action (including the commencement and carrying out of legal and court proceedings); and
- To reorganise or make changes to our business, for example if we merge, combine or divest a part of our business, we may need to transfer some or all of your personal data to the relevant third party (or its advisors) as part of any due diligence process or transfer to that re-organised entity or third party.

Where relying on legitimate interest, we ensure the processing remains proportionate and that your interests, fundamental rights and freedoms are preserved. Should you wish to obtain more information about such balancing test, please contact us using the contact details provided in section 13 below.

7 Who we share your personal data with

Lion's Head is a global investment bank and as such any personal data that we collect, or you provide to us may be shared with by any Group entity among our global network for commercial and efficiency needs such as those relating to our legal and regulatory obligations or based on our legitimate interest.

We may also share your personal data with certain of the following categories of third parties:

- Our professional advisors (e.g. legal, financial, business, risk management or other advisors), bankers and auditors;
- Our insurers and insurance brokers;
- Our banking and commercial partners, independent agents, intermediaries or brokers, financial institutions, counterparties, trade repositories with which we have a relationship if such transmission is required to allow us to provide you with the services and products or execute our contractual obligations or transaction (i.e. banks, correspondent banks, depositaries, custodians, issuers of securities, paying agents, exchange platforms, insurance companies, payment system operators, issuers or payment card intermediaries); Third party service providers, for example where we



outsource certain functions such as human resources, technology and IT services and translation services (we have agreements in place with these service providers to protect the confidentiality and security of information (including personal data) shared with them).

We may also process your personal data to comply with our regulatory requirements or in the course of dialogue with our regulators as applicable, which may include disclosing your personal data to local or foreign financial, tax, administrative, criminal or judicial authorities, arbitrators or mediators, law enforcement, state agencies, fraud prevention agencies or public bodies in connection with their request and/or defending or responding to a matter, action or proceeding and/or complying with regulation or guidance from authorities applying to us or any member of the Group. Where permitted, or unless to do so would prejudice the prevention or detection of a crime, we will direct any such request to you or notify you before responding.

8 Which countries we transfer your personal data to

In certain circumstances, we may transfer personal data to locations outside the jurisdiction in which you provide it, or where you are viewing our website. In case of international transfers originating from the European Economic Area (“EEA”) to a non-EEA country, where the European Commission has recognised a non-EEA country as providing an adequate level of data protection, your personal data may be transferred on this basis.

For transfers to non-EEA countries where the level of protection has not been recognised as adequate by the European Commission, we will either rely on a derogation applicable to the specific situation (e.g. if the transfer is necessary to perform our contract with you such as when making an international payment) or implement one of the following safeguards to ensure the protection of your personal data:

- Standard contractual clauses approved by the European Commission;
- Binding corporate rules.

Where there are other international transfer restrictions, we will implement appropriate safeguards to ensure the protection of your personal data.

[Regardless of the location of our processing, we will impose the same data protection safeguards that we deploy inside the EEA and implement appropriate measures to ensure that your personal data is protected in accordance with applicable data protection laws. Lion’s Head has a data sharing agreement in place signed by all Lion’s Head entities which includes such standard contractual clauses. Similarly, where a third party service provider processes the personal data of EEA or UK residents on our behalf, we will ensure that appropriate measures are in place to ensure an adequate level of protection for your personal data, usually by including EU standard contractual clauses in our agreements with such third party service providers (alongside other supplementary technical or contractual measures where necessary).]

Please contact us as directed below if you would like to see a copy of the specific safeguards applied to the export of your personal data.

9 How long we keep your personal data

We will retain your personal data for the longer of (i) the period required by applicable law and (ii) such other period necessary to fulfil the purpose for which this data was collected and any other permitted linked purpose (for example certain transaction details and correspondence related to any financial services we provide may be retained until the time limit for claims in respect of the transaction has expired, or in order to comply with regulatory requirements regarding the retention of such data). Retention periods for records are determined based on the type of record, the nature of the activity, product or service, applicable local legal or regulatory



requirements. Retention periods may be changed from time to time based on business or legal and regulatory requirements.

We may, on exception, retain your information for longer periods, particularly where we need to withhold destruction or disposal based on an order from the any courts of competent authority, or in relation to an investigation by law enforcement agencies or our regulators. This is intended to make sure that we are able to produce records as evidence, if needed to those respective authorities.

10 How we protect your personal data

We recognise that information security is an integral element of data privacy. We will take all steps reasonably necessary to ensure that your information and/or data is treated securely and in accordance with this Privacy Notice. While no form of data transmission (including over the Internet or any website) can be guaranteed to be secure, we implement a range of reasonable physical, technical and procedural measures to help protect personal data from unauthorised access, use, disclosure, alteration or destruction in accordance with data protection laws. Accordingly, in the case of a security breach we do not accept any liability for the direct or indirect loss, theft or misuse of the any information and/or data that you have provided to us and/or which you have registered on the Lion's Head Group websites.

Information that you provide to us is stored on our or our service providers' secure servers and accessed and used subject to our security policies and standards, or those agreed with our service providers. The Firm's IT system is based on a very resilient model which is partly facilitated through Microsoft via a global array of datacentres, networks and infrastructures, and have been designed with data security, disaster recovery and data retention built-in.

Everyone at Lion's Head, and any third party service providers we may engage that process personal data on our behalf (for the purposes listed above), are also contractually obligated to respect the confidentiality of personal data.

Alongside our role, please also note that where we have given you (or where you have chosen) a password which enables you to access certain parts of our websites or online services, you are responsible for keeping this password confidential and for complying with any other security procedures that we notify you of. We ask you not to share a password with anyone.

11 What rights you have in relation to your personal data

If you have any questions about our use of your personal data, you should first contact us via the details provided in section 13 below. Under certain circumstances and in accordance with UK, EU or other applicable data protection laws, you may have the right to require us to:

- Provide you with further details on the use we make of your information;
- Provide you with a copy of information that we hold about you;
- Update any inaccuracies in the personal data we hold;
- Delete any personal data that we no longer have a lawful ground to use;
- Where processing is based on consent, to withdraw your consent so that we stop that particular processing;
- Object to any processing based on the legitimate interests ground unless our reasons for undertaking that processing outweigh any prejudice to your data protection rights; and
- Restrict how we use your information whilst a complaint is being investigated.



You may also ask us not to process your personal data for marketing purposes. We will inform you if we intend to disclose your information to any third party service provider for this purpose. You can exercise your right to prevent such processing at any time by using an unsubscribe facility or contacting via the details provided in section 13 below.

We are also required to take reasonable steps to ensure that your personal data remains accurate. In order to assist us with this, please let us know of any changes to the personal data that you have provided to us by contacting us via the details provided in section 13 below.

While it is our policy to respect the rights of individuals, please be aware that your exercise of these rights is subject to certain exemptions to safeguard the public interest (e.g. the prevention or detection of crime), our interests (e.g. the maintenance of legal privilege) and some of these rights may be limited (for example the right to withdraw consent) where we are required or permitted by law to continue processing your personal data to defend our legal rights or meet our legal and regulatory obligations.

If you contact us to exercise any of these rights, we will check your entitlement and respond in most cases within a month. If you are not satisfied with our use of your personal data or our response to any exercise of these rights, you have the right to complain to the data protection regulator.

12 How we use cookies and similar technologies

When you visit our websites, we may send a cookie to your computer. This is a small data file stored by your computer to help improve functionality or tailor information to provide visitors with more relevant pages. For details of the cookies employed by us, please see our Cookie Policy on our website, and which forms part of this Privacy Notice. We may also analyse website traffic to identify what visitors find most interesting so we can tailor our websites accordingly.

13 How you can contact us

If you have any questions about this Privacy Notice or how we process your personal data, please contact us by sending an email to data.controller@lhgp.com or by writing to:

Data Controller
Lion's Head Group Ltd
130-132 Buckingham Palace Road
London, SW1W 9SA
United Kingdom

14 How we may update this Privacy Notice

We may change the content of our websites and how we use cookies without notice and consequently our Privacy Notice and Cookie Policy may change from time to time in the future. We therefore encourage you to review them when you visit the website to stay informed of how we are using personal data.

This Privacy Notice was last updated in March 2022.