

Privacy Policy – Solas Private Market Advisors

Part 1: Background

Solas Private Market Advisors Limited understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of all of our clients, counterparties and contacts and will only collect and use personal data in ways that are described in this Privacy Notice, and in a manner that is consistent with our obligations and your rights under the law.

Solas Private Market Advisors Limited is a company registered in England and Wales under company number **15777066**.

Registered address: **37a Nethergate, Sheffield, Stannington, S6 6DH**

Solas Private Market Advisors Ltd (FRN: 1022651) is an Appointed Representative of Thornbridge Investment Management LLP (FRN: 713589) which is authorised and regulated by the Financial Conduct Authority.

Part 2: What does this notice cover?

This Privacy Notice explains how we use your personal data: how it is collected, how it is held, and how it is processed. It also explains your rights under the law relating to your personal data.

We may revise this Notice from time to time by updating this page. You should check this page periodically to ensure that you are happy with any changes.

Part 3: What is personal data?

Personal data is defined by the UK General Data Protection Regulation (“UK GDPR”) and the Data Protection Act 2018 (collectively, the “Data Protection Legislation”) as any information relating to an identifiable person who can be directly or indirectly identified.

Personal data includes obvious information such as your name and contact details, but also less obvious information such as identification numbers, electronic location data, and online identifiers.

The personal data that we use is set out in Part 5 below.

Part 4: What are your rights?

Under the Data Protection Legislation, you have the following rights:

- The right to be informed about our collection and use of your personal data
- The right of access to the personal data we hold about you
- The right to rectification if your data is inaccurate or incomplete
- The right to erasure (“right to be forgotten”)
- The right to restrict processing
- The right to object to processing
- The right to data portability
- The right to withdraw consent at any time (where applicable)
- Rights relating to automated decision-making and profiling (we do not use your data in this way)

To exercise any of your rights, please contact us using the details in Part 11.

You also have the right to lodge a complaint with the Information Commissioner’s Office (ICO). We would, however, appreciate the opportunity to address your concerns first.

Part 5: What personal data do we collect?

Solas Private Market Advisors Limited may collect and process personal data in connection with its business activities, including investor relations, fundraising, advisory and placement services.

This may include (but is not limited to):

- Name
- Job title / position
- Employer / organisation
- Email address
- Telephone number
- Business address
- Correspondence and meeting notes

Where required for legal or regulatory purposes (including KYC / AML checks), we may collect:

- Identification documents (e.g. passport)

- Proof of address
- Date of birth
- Other verification documents

We will only collect personal data that is necessary for our business purposes.

Part 6: Lawful basis for processing

We rely on the following lawful bases:

- **Legitimate interests** – conducting our advisory and placement business
 - **Performance of a contract** – where we enter into agreements with you
 - **Legal obligation** – including regulatory and compliance requirements (e.g. KYC/AML)
 - **Consent** – where required (e.g. certain marketing communications)
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Part 7: How we use your personal data

We use personal data for:

- Conducting our private markets advisory and placement activities
- Managing relationships with clients, investors and counterparties
- Providing information about services and opportunities
- Internal business operations and record-keeping
- Recruitment
- Compliance with legal and regulatory obligations

We do not use your personal data for automated decision-making.

Marketing

Where permitted by law, we may contact you with relevant updates, opportunities or information relating to our services. You can opt out at any time.

We will never sell your personal data.

Part 8: Data retention

We retain personal data only for as long as necessary.

For KYC/AML purposes, we may retain data for **up to 5 years** after the end of a business relationship (or longer if legally required).

We consider:

- The nature and sensitivity of the data
- Legal and regulatory requirements
- Business needs

Data is securely deleted or anonymised when no longer required.

Part 9: Sharing your data

We may share personal data with:

- Professional advisers (legal, compliance, audit)
- Service providers (IT, CRM systems)
- Regulatory authorities or law enforcement (where required)
- Clients or counterparties where necessary for transactions

We ensure appropriate safeguards are in place.

We do not transfer data outside the UK/EEA unless appropriate protections are implemented.

Part 10: Accessing your data

You may request access to your personal data at any time (“subject access request”).

Requests should be sent to the contact in Part 11.

We do not usually charge a fee unless requests are excessive.

Part 11: Contact

For all data protection queries, please contact:

Solas Private Market Advisors Limited

Email: brendan@solaspma.com