GREEN PARK HOUSE

LONDON, W1J 8LQ

MARCENA CAPITAL LTD

Privacy and Data Usage Notice

APPLICABLE DATA SUBJECTS

- Clients & Investor Counterparties
- Corporate Finance & Portfolio Contacts
- Third-Party Service Providers
- Website Users

REGISTERED OFFICE | 2026

Marcena Capital Ltd
15 Stratton Street
London, W1J 8LQ
United Kingdom

1. Introduction

Marcena Capital Ltd and its affiliated entities (**"Marcena"**, **"we"**, **"us"**, or **"our"**) are committed to protecting the security and privacy of your personal data. We ensure that any personal data we collect about you is held and processed in accordance with the UK General Data Protection Regulation (**"UK GDPR"**), the UK Data Protection Act 2018, and, where applicable, the European Union General Data Protection Regulation (**"EU GDPR"**) (together, **"Data Protection Legislation"**). The terms **"personal data"**, **"data controller"**, **"processing"**, and **"data subject"** have the meanings given to them under applicable Data Protection Legislation.

2. Scope

This Privacy Notice explains how we handle the personal data you provide to us, or that we collect about you, in the following ways (your **"Data"**):

(a) when you submit Data to us through our website (www.marcenacapital.com) or via information we collect during your visit to our website;

(b) when you or a third party (such as your employer or adviser) submit Data to us in the course of our providing services to, or evaluating transactions with, you or that third party;

(c) when you or a third party (such as your employer) submit Data to us where we obtain services from you or your organisation as a service or asset provider to us;

(d) when we use your Data (whether obtained directly from you, a third party, or publicly available sources) to contact you in connection with our clients, funds, or investment mandates; and

(e) when we collect Data about you from third-party sources, regulatory registers, or other publicly available sources, such as your employer's website or corporate filings.

3. Identity and Contact Details of Data Controller and Data Protection Contact

Marcena Capital Ltd is the data controller responsible for your Data. Any questions, requests, or correspondence regarding this Privacy Notice or our data protection practices should be directed to:

Email:	assets@marcenacapital.com
Post:	**Arnaud van der Wyck** c/o Capital Alliance Partners Ltd 46 Great Marlborough Street London W1F 7JW United Kingdom **FAO: Data Protection and Compliance**

4. What We Use Your Data For and Lawful Basis

The table below sets out the categories of Data we hold across different data subject groups, the purposes for which we process that Data, and the lawful basis under Data Protection Legislation for each processing activity:

Data Subject Category	Categories of Data Held	Purposes of Processing	Lawful Basis
Website Users	Personal contact details, inquiry details, and website usage/technical data.	Initial due diligence, responding to queries, and website administration and security.	Legitimate Interests (operating our business and responding to inquiries) and Consent (where applicable).
Third-Party Service Providers	Personal contact details, professional details, billing information, and records of services provided.	Discharging contractual obligations, vendor management, compliance checks, and supporting client activities.	Performance of a Contract, Legal Obligation (regulatory and tax compliance), and Legitimate Interests.
Clients & Corporate Finance Contacts	Personal and business contact details, financial and KYC/AML verification details, employment and career history, and records of services provided or rendered.	Client and investor activities, transaction execution, B2B relationship management, regulatory compliance, and market research.	Legitimate Interests, Performance of a Contract, Legal Obligation (AML/KYC and regulatory compliance), and Consent (where required).

5. Data Security

5.1. We have put in place appropriate technical and organisational security measures to prevent your Data from being accidentally lost, used, or accessed in an unauthorised way, altered, or disclosed. In addition, we limit access to your Data to those employees, affiliates, agents, and third parties who have a strict business need to know.

5.2. We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable supervisory authority of a breach where we are legally required to do so.

6. Who We Share Your Data With

6.1. We may on occasion be required to share your Data with the following categories of recipients:

(a) other Marcena entities, representatives, principals, and affiliates;

(b) third parties who provide services to us or on our behalf. For example, we use third parties as part of our IT infrastructure, legal, audit, and compliance functions, and engage with a number of other service providers as part of our wider business. A list of our third-party service providers that potentially have access to your Data is available upon reasonable request;

(c) other Marcena clients, co-investors, and corporate finance contacts where this is necessary in connection with the performance by us of services to our clients or investment mandates; and

(d) regulatory bodies, law enforcement agencies, courts, or other third parties:

(i) where we are required to do so by applicable law or an enforceable request by a regulatory body; or

(ii) where it is necessary for the purpose of, or in connection with, legal proceedings, or in order to establish, exercise, or defend legal rights.

7. International Transfers

7.1. In certain circumstances, we may transfer your Data to clients, counterparties, affiliates, or third-party service providers located in countries outside the United Kingdom or the European Economic Area (**"EEA"**), which may not adhere to the same levels of data protection to which jurisdictions within the UK or EEA are subject.

7.2. Any such international transfers are, at all times, made in full accordance with Data Protection Legislation, including by relying on UK or EU adequacy regulations or by implementing appropriate safeguards such as the UK International Data Transfer Agreement (IDTA), the UK Addendum to the EU Standard Contractual Clauses, or the EU Standard Contractual Clauses.

8. Retention Period

8.1. We will only retain your Data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, anti-money laundering, accounting, tax, regulatory, or reporting requirements. To determine the appropriate retention period for your Data, we consider the amount, nature, and sensitivity of your Data, the potential risk of harm from unauthorised use or disclosure of your Data, the purposes for which we process your Data and whether we can achieve those purposes through other means, and the applicable legal requirements.

8.2. As a general rule, this means that your Data will be stored for a maximum period of **10 years** from the date on which our relationship or interaction with you ends, after which time it will be securely deleted or put 'beyond use' if it is no longer required for the lawful purpose(s) for which it was obtained or to comply with statutory obligations.

9. Your Rights in Relation to Your Data

9.1. Under Data Protection Legislation, you have the following rights in relation to how we process your Data (subject to applicable statutory exemptions):

- **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, request 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:** you may require us to restrict the processing we carry out on your Data in certain circumstances;
- **Right to data portability:** where applicable, you have the right to receive your Data in a structured, commonly used, and machine-readable format;
- **Right to withdraw consent and object to processing:** where you have provided your consent to us processing your Data, you have the right to withdraw your consent at any time. Additionally, where we are relying on legitimate interests to process your Data, you have the right to object to such processing. This can be done by emailing **assets@marcenacapital.com** at any time; and
- **Right to lodge a complaint:** you have the right to lodge a complaint with a relevant data protection supervisory authority. The supervisory authority in the United Kingdom is the **Information Commissioner's Office (ICO)**. If you are located in the EEA, you may also lodge a complaint with your local EEA supervisory authority.

9.2. For further information on your rights, please visit the Information Commissioner's Office website at https://ico.org.uk.

9.3. Please note that, in circumstances where you are seeking to exercise your rights as a data subject, we may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is an appropriate security measure to ensure that your Data is not disclosed to any person who does not have a right to receive it.

10. Additional Information

10.1. We do not undertake automated decision-making or profiling of your Data.

10.2. We keep our data protection policy (including this Privacy Notice) under regular review and may update it from time to time to reflect our practices or to remain compliant with relevant legislation. Where required by law, we will notify you of any material changes to our Privacy Notice.