



## Privacy Notice

### Purpose of this privacy notice:

As of 25<sup>th</sup> May 2018, the new General Data Protection Regulation (“GDPR”) comes into force. It is a wide-ranging regulation designed to protect the privacy of individuals in the European Union (“EU”) and give them control over how their personal data is processed, including how it is collected, stored and used. It affects every company in the world that processes personal data about people in the EU, including IPM.

IPM takes your right to privacy and the protection of your personal data very seriously. As GDPR comes into force, we would like to take this opportunity to let you know your rights and how we use your personal data, and re-affirm our commitment to your privacy irrespective of whether or not you are based in the EU.

This privacy notice supplements the other notices and agreements we may have with you, and is not intended to override them. This privacy notice was last updated on 6<sup>th</sup> November 2019.

### Who IPM is as the controller or your personal data:

IPM refers to IPM Group Holdings Limited (or “IPM Group”), and any of its affiliates with whom you may have come into contact with (which in this notice may be referred to as “IPM”, “we”, “us” and “our”).

IPM Group Holdings Limited is a UK Limited Company registered in England and Wales with company number 11719671, having its registered office at:

IPM Group Holdings Limited  
123 Pall Mall  
London SW1Y 5EA  
United Kingdom

InfraPartners Management LLP, which is part of IPM Group, is authorised and regulated by the Financial Conduct Authority with firm reference number 697484.

For any queries relating to this privacy notice, you can email us at [data@ipmlip.com](mailto:data@ipmlip.com).

### What IPM uses your personal data for:

- 1) If we have had or continue to have an existing business relationship with you, we may retain your personal data for operational processing and administration purposes in order to carry out any of our obligations under that business relationship (e.g. if we have agreed to provide you with information or are required to report information about our business relationship with you to a legal or regulatory authority), and also in case we wish to contact you about future business opportunities that might be of interest to you.
- 2) If we have not had any prior business relationship with you but have communicated with you in the past for some other purpose (e.g. via our website contact form), we may retain your personal contact data (your name, email address and phone number) in case we wish to contact you about future business opportunities that might be of interest to you.
- 3) If you have been employed by IPM, or have submitted your personal data for potential employment at IPM, we may retain your personal data on file in order to contact you in case any future employment opportunities at IPM might be of interest to you.

- 4) IPM's service providers, such as our administrators, auditors, and IT service providers, may in the course of providing services to IPM be required to come into contact with your personal data. These professional organisations are all based in the EU and therefore also fall under the GDPR requirements, are only ever furnished with your personal data for a legitimate interest (e.g. to carry out their service obligations to IPM), and are bound by strict terms of confidentiality under their contract with IPM. IPM ensures that all of its service providers are professionally accredited where appropriate.

#### **Our obligations and promises to you:**

- 1) We will never sell, transfer or allow third parties (other than IPM's service providers) to make use of your personal data without your explicit prior consent.
- 2) In the case of IPM's service providers, we will never permit them to make use of your personal data other than as required to provide services to IPM, and under strict terms of confidentiality.
- 3) We will take steps to ensure any data we hold on you is kept safely and securely, and is only available to those within IPM that have a legitimate interest to have access your personal data.
- 4) If you wish to know what personal data we hold on you, you can do so at any time by emailing [data@ipmllp.com](mailto:data@ipmllp.com), and we must respond to you within one month – although we shall endeavour to respond to your request much sooner. If your request is complex or you make multiple requests, it may take longer for us to respond to you in which case we will let you know in advance.
- 5) If you wish us to “forget” you, and delete all personal data that we retain on you from our files and systems, you can request this by emailing [data@ipmllp.com](mailto:data@ipmllp.com) and we shall do so provided that we do not have a legal or regulatory obligation to maintain your personal data. If for whatever reason we cannot delete your personal data, we will let you know why and what other options you might have available to you.

#### **Further information on the GDPR and your rights:**

More information on the impact of GDPR and your rights can be found at the website of the Information Commissioner's Office (“ICO”), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)).

You have the right to make a complaint at any time to the ICO. IPM is committed to resolving any queries or complaints that you might have with respect to your personal data, and as such we would encourage you to contact us at [data@ipmllp.com](mailto:data@ipmllp.com) in the first instance should you have any concerns.