

Prospect Research Privacy Policy

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(based on draft from consultants, IFC) **Adopted by the Board on:** 01/07/2022

Last review date: N/A Next review date: June 2023

Statement of policy

Alongside our <u>Website Privacy</u>, <u>Cookie and Data Use Policy</u>, Lendahand Ethex Ltd. (trading as "Energise Africa") undertake fundraising and prospect research to secure additional financial and non-financial support for our scale up and product development activities. This requires us to collect, store and process data on both organisations and individuals who we believe may be credible prospects for our fundraising activities.

Note that this policy is not intended to cover investments made by retail investors on the platform, and that reference to investment in this policy should be taken to mean those made by institutional or philanthropic investors, either as an investment or donation directly to Energise Africa, or as match funding or other form of financial or non-financial support for products offered on the platform.

What we collect

- Grant, donation and investment history
- Communication and contacts with you, including event attendance

How we collect your data

Energise Africa collects data in the following ways:

Information you provide us directly

This could include when you attend an event or make a donation or investment directly to Energise Africa, work with us as a volunteer or ambassador or otherwise communicate with you.

Information which is available publicly

We sometimes conduct research on individuals from publicly available sources, which may include Linkedin, Companies House, newspapers, magazines or online news sources, websites, databases and the Charity Commission.

We collect this data in order to determine whether an individual may be a potential major donor/investor and may be interested in an approach from us. This also helps us ensure our communications, events and campaigns are targeted effectively, and helps us avoid contacting those who are not likely to be receptive to an approach as their interests lie elsewhere. The data also helps us ask for funding at levels appropriate to the individual and create short profiles of prospective or current supporters when they are due to meet with our senior staff or board members, so that they understand who those individuals are and what their interests or connections to our own objectives may be.

Please note that we do not seek to gather information where it is reasonable to conclude that an individual has made an effort to keep that information confidential or that they would reasonably expect such information about them to be kept private, such as information regarding family life on social networks, revealing personal relationships that exist outside the business world or information which is considered 'sensitive' under the regulations. Examples of this type of sensitive data (known as "special category data") would be information about health, race, religious beliefs, political views, trade union membership, sex life or sexuality or genetic/biometric information.

Lendahand Ethex Ltd., trading as Energise Africa, (FRN 776908) is an appointed representative of Share In Ltd. (FRN 603332), which is authorised and regulated by the UK Financial Conduct Authority.

The basis for processing information

Data protection laws mean that each use we make of personal information must have a "legal basis". The relevant legal bases are set out in the General Data Protection Regulation (EU Regulation 2016/679) and in current UK data protection legislation.

Specific consent

Consent is where we ask you if we can use your information in a certain way, and you agree to this (for example when we send you marketing material via post, phone, text or e-mail). Where we use your information for a purpose based on consent, you have the right to withdraw consent for any future use of your information for this purpose at any time.

Legal obligation

We have a basis to use your personal information where we need to do so to comply with one of our legal or regulatory obligations. For example, in some cases we may need to share your information with our various regulators such as the Financial Conduct Authority, Charity Commission, Fundraising Regulator, or Information Commissioner, or to use information we collect about you for due diligence or ethical screening purposes.

Legitimate interests

We have a basis to use your personal information if it is reasonably necessary for us to do so and in our "legitimate interests" (provided that what the information is used for is fair and does not unduly impact your rights).

We rely on Legitimate Interest for processing data on prospective supporters, in order to determine whether or not an approach from us would be appropriate. We only rely on legitimate interests where we consider that any potential impact on you (positive and negative), how intrusive it is from a privacy perspective and your rights under data protection laws do not override our interests in us using your information in this way.