

Old Mission

Counterparty Privacy Notice – UK

Last Updated: November 17, 2025

Introduction

This is the counter-party privacy notice (the **Notice**) of Old Mission Group LLC and our affiliated or related companies (collectively, **Old Mission, we, or us**). Old Mission includes Old Mission Europe LLP, a limited liability partnership registered in England. This Notice applies to Old Mission's collection and processing of data related to UK data subjects.

Old Mission fully respects your right to privacy. This Notice explains the ways that Old Mission processes personal data that it gathers from clients and other contract counterparties. This Notice also reflects our commitment to safeguarding the privacy of our clients and other contract counterparties (collectively, **you**) and to protecting the personal information you share with us.

This Notice explains the types of personal information collected by us and how such information may be collected, used, processed, utilized, maintained, or shared. It applies to the processing of personal information by Old Mission, acting as a controller, in connection with:

- any engagement or other contract that we enter into with you;
- informing you about the services offered by Old Mission to its clients and business partners;
- communications with you, including to respond to your enquiries.

Our website privacy policy applies where we are in contact with you in other ways and in respect of your use of our website <https://www.oldmissioncapital.com>.

This Notice does not apply to information you provide to us or that we collect in the context of recruitment and hiring. We have a separate candidate privacy notice in connection with job applications. A link to the relevant candidate privacy notice is provided to candidates through the application process.

Old Mission offers services in the UK through its affiliated entity, Old Mission Europe LLP, a limited liability partnership incorporated in England with registration number OC403724 and whose registered office address is at 1 Finsbury Square, 4th Floor, London, England, EC2A 1AE, UK (**OME**). OME will be the controller of any personal data that you provide in connection with any contracts entered into with OME, and OME will deal with such data in accordance with this Notice. Depending on where you are located and the location from which our services are provided, the controller of your personal information, as processed by us under this Notice, will be different.

If you have any questions about this Notice, including any requests to exercise your legal rights, please contact us at dataprotection@oldmissioncapital.com.

Collection of Personal Information

Old Mission processes **Personal Information** regarding its professional contacts, including our clients' representatives, when using our services. Personal Information is information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular individual. It includes information that can identify an individual when combined with other information to which we have or are likely to have access. It does not include data from which your identity has been removed (anonymous or anonymised data).

We will only process your Personal Information when we have a legal basis to do so (as outlined in further detail below), or when we have obtained your consent if such consent is required under applicable data privacy laws.

Where you provide Personal Information of third parties to us, you warrant and represent to us that you have obtained all prior necessary consents from such third parties to provide us with their Personal Information for the relevant purposes for which you made the disclosure or as was notified to you at the relevant time and all other purposes as set out in this Notice, in accordance with all applicable laws, regulations, and/or guidelines.

We may collect Personal Information:

- that you voluntarily submit to us, such as your contact details when entering into contracts with us or interact with us by email, at online and physical events, in person or over the phone, or in the course of our business activities, including our provision of services. Such information includes your first and last name, job title, professional and employment-related information, company name, email address, phone number, postal address and other similar identifiers (**Contact Details**); and
- from third parties, such as from publicly accessible sources (for example, UK Companies House), client due diligence providers, websites which identify you, social media platforms (for example, LinkedIn), third-party introducers or business contacts (for example, accountants), recruitment agents, and your business associates (together, **Third-Party Sourced Data**).

Special Category Personal Information

For the purposes of UK GDPR, some of the Personal Information which you provide to us, or which we may receive, may be ‘*special category*’ personal data. This is defined by UK GDPR to include personal data revealing a person’s racial or ethnic origin, religious, or philosophical beliefs, or data concerning health. We process special category Personal Information where

- you have given explicit consent to the processing for one or more specified purposes;
- the processing is necessary for the establishment, exercise, or defence of legal claims; and/or
- the processing is necessary for reasons of substantial public interest, in accordance with applicable law.

We do not generally seek to collect special category Personal Information or criminal offence or convictions data about you in the context of any engagement or other contract that we enter into with you.

Aggregated Data

We may collect, use, and share aggregated data such as statistical or demographic data for various purposes. Aggregated data may be derived from your personal data but is not considered personal data in law as it does not directly or indirectly reveal your identity, as the data has been anonymised.

If we combine or connect aggregated data with your Personal Information so that it can directly or indirectly identify you, we treat the combined data as Personal Information which will be used in accordance with this Notice.

Lawful Basis

The table below summarises the categories of Personal Information we collect about you, how we use that information and, for purposes of UK GDPR, the appropriate legal bases which we rely on to process the Personal Information.

Purpose or activity	Type of data	Lawful basis for processing (including basis of legitimate interest)
To provide you with information and services that you request from us.	Contact Details and Third-Party Sourced Data.	It is in our legitimate interests to respond to your queries in order to generate and develop our business. We consider this use to be proportionate and not prejudicial or detrimental to you.
To agree and enter into any engagement or other contract that we enter into with you.	Contact Details and Third-Party Sourced Data.	We need to gather and process this data in order to enter into any engagement or other contract that we enter into with you. Where our counterparty is a company, this personal data may relate to the representatives of the company with whom we are dealing. Gathering and processing necessary Personal Information in this context is permitted under UK GDPR.
To enforce our terms and conditions and any contracts entered into with you (including for the establishment, exercise, or defence of legal claims).	Contact Details.	It is in our legitimate interests to enforce our terms and conditions and any applicable contracts. We consider this use to be necessary and proportionate to protect our legitimate interests.
Administrative purposes which include notifying you about changes to our terms and/or privacy notice.	Contact Details.	It is in our legitimate interests to ensure that any changes to our policies and other terms are communicated to you. We consider this use to be necessary for our legitimate interests and not prejudicial or detrimental to you.
We also process Personal Information in order to comply with applicable legal obligations to which it is subject, including to comply with 'know your client' and anti-money laundering laws and employment law.	Contact Details and Third-Party Sourced Data.	As is necessary for compliance with a legal obligation to which we are subject.

Disclosure of Personal Information

We do not sell or share for cross-context behavioral or targeted advertising purposes your Personal Information to any third party. We may disclose your Personal Information in the following circumstances:

- To other entities in Old Mission.
- To third-party vendors or processors that provide us with the services necessary to enable us to fulfil the terms of any engagement or other contract that we enter into with you. These third parties are only permitted to use your Personal Information to the extent necessary to

enable them to provide their services to us. They are required to follow our instructions and to comply with appropriate security measures to protect your Personal Information.

- To our affiliates and other entities acting as independent controllers, which may be tax, legal, or government authorities, law enforcement agencies, regulators and professional bodies, or third parties in connection with claims, disputes, litigation, or investigations where we reasonably believe that disclosure is required by law or pursuant to legal process, or is necessary to establish, exercise, or defend legal claims, including to protect or defend your rights, property, or security or ours. In certain circumstances, we may be prohibited from telling you that a disclosure has been made.
- To other third parties when you expressly consent to such sharing.
- To other parties in connection with any sale or transfer of assets we make, or in connection with any merger, transfer, reorganization, financing, change of control, or acquisition in relation to Old Mission.

International Transfers

Old Mission is an international business, with clients, affiliates and offices located throughout the world. As our headquarters are based in the United States, your Personal Information will be transferred to the United States for the purposes referred to under this Notice.

In addition, when we disclose your Personal Information with the recipients mentioned above, it may involve transfers of your Personal Information overseas, which may include transfers to countries outside of the UK/EEA whose laws provide levels of protection for Personal Information that are not always equivalent to the level of protection that may be provided in your own country.

We have procedures and contractual obligations in place to ensure that Personal Information is transferred, processed, and stored with appropriate safeguards and in accordance with applicable laws. Such appropriate safeguards include the implementation of an international data transfer agreement, in the form issued by the UK Information Commissioner, covering transfers of Personal Information between OME and US based entities in the OME group. Please contact us using the details set out at the end of this Notice if you would like further information about our data transfer mechanisms.

Security Procedures

Old Mission maintains appropriate technical and organizational security procedures in order to protect your Personal Information from loss, misuse, unauthorized access, disclosure or alteration, in accordance with applicable data protection and privacy laws.

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

In addition to such measures, Old Mission limits access to your Personal Information to those personnel, agents, contractors and other third parties who have a need to know. We maintain confidentiality policies that govern all information that any of our employees or contractors receives in the course of their employment or association with us. All employees and contractors are made aware of these policies, and we have in place procedures to train all relevant personnel so that they can put these policies into practice. Despite our efforts, we cannot guarantee the security of information transmitted over the internet or that Personal Information will not be accessed by unauthorized persons. You should always take adequate precautions to protect your Personal Information.

Retention of Personal Information

Old Mission will retain your Personal Information for no longer than is necessary for the purposes identified under this Notice in accordance with our legal obligations and legitimate business interests, and as permitted by applicable law.

Please note that the data retention period applied by Old Mission to your Personal Information may vary, depending on the nature of the data, the applicable jurisdiction, and the purpose of collection. To determine the appropriate retention period, we consider the amount, nature, and sensitivity of the Personal Information, the potential risk of harm from its unauthorized use or disclosure, the purposes for which it is processed by us and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting, reporting, or other requirements to which we may be subject. Upon the expiration of the applicable data retention periods, we will delete the relevant Personal Information.

We will keep your Personal Information for the whole duration of any engagement or other contract that we enter into with you, as extended by applicable data retention periods in our records management or data retention policies, or for as long as may be required by applicable statutory or professional retention obligations.

In some circumstances we will anonymise your Personal Information, so that it can no longer be associated with an individual, for research or statistical purposes. As long as such data remains anonymised, we may use it indefinitely without further notice to you.

Your Rights under the UK GDPR

If our processing of your Personal Information is subject to UK GDPR, you have various rights in relation to such processing, depending on the relevant situation. These include the following:

- **Access:** right to request confirmation as to whether or not your Personal Information is being processed by us and, if so, the right to receive a copy of it.
- **Rectification:** right to request the rectification of your Personal Information without undue delay if you find that it is inaccurate or incomplete.
- **Erasure:** right to request the erasure or deletion of your Personal Information without undue delay.
- **Restriction:** right to request, in some circumstances, to limit the purposes for which we process your Personal Information if continued processing in this way is not justified, for example where the accuracy of the Personal Information is contested by you.
- **Data portability:** right to request, in some circumstances, a copy of your Personal Information provided to us, in a structured, commonly used, and machine-readable format.
- **Objection:** right to object, on grounds relating to your particular situation, to the processing of your Personal Information based on legitimate interests. You can object at any time to the processing of your Personal Information for direct marketing communications.
- **Withdrawal of consent:** if you have provided consent to any processing of your Personal Information, you have a right to withdraw that consent.

Please note that some of these rights are not absolute. There are a number of exceptions which, if applicable, may mean we do not have to fulfill your request. For example, we may refuse a request for erasure where the processing is necessary to comply with a legal obligation or necessary for us to establish, exercise or defend legal claims.

In order to exercise any of your rights, or if you have any other questions about our use of your Personal Information, including if you wish to obtain further details regarding our legitimate

interests, please send a request using the contact details specified at the end of this Notice. Please note that we may ask you to provide us with additional information in order to verify your identity.

Save as provided under applicable data protection laws, there is no charge for the exercise of your legal rights. However, if your requests are manifestly unfounded or excessive, in particular because of their repetitive character, we may either:

- charge a reasonable fee taking into account the administrative costs of providing the information or taking the action requested; or
- refuse to act on the request.

Please contact us using the contact details specified at the end of this Notice to resolve any issues if you consider that the processing of your Personal Information carried out by us infringes any applicable privacy laws.

If we have been unable to resolve your concern with a reasonable period you have the right to lodge a complaint with the competent data protection authority in the country of your habitual residence, place of work, or place of an alleged infringement. In the UK, you can complain to the Information Commissioner's Office who can be contacted at <https://ico.org.uk> or by telephone in the UK on 0303 123 1113.

Children's Privacy

Old Mission does not knowingly collect, use, or disclose Personal Information from children under the age of 16. If we are made aware that we have collected Personal Information from a child in a manner that is inconsistent with applicable laws, we will delete this information as soon as possible.

We do not sell or share the Personal Information of any individuals and, therefore, do not sell or share the information of children of any age.

Revisions to this Notice

Old Mission reserves the right to change or update this Notice at any time. We will provide you with a copy of any such updated Notice.

Contact

For any requests, questions or comments about this Notice or the collection, processing, or storage of your Personal Information by Old Mission, please contact our Privacy team via e-mail at: dataprotection@oldmissioncapital.com.