

Verdancia Capital – Privacy Policy

Last Updated: August 2026

Verdancia Capital Ltd. (“Verdancia”, “we”, “us”, or “our”) is committed to protecting the privacy and confidentiality of the personal information we collect in the course of our business as a private investment manager. This Privacy Policy describes how we collect, use, disclose, and safeguard personal information, and the rights available to individuals under applicable laws.

This Privacy Policy applies to information collected through our website, through our communications with prospective and existing investors, and through our investment-management activities.

1. Information We Collect

We may collect and process the following categories of personal information:

- **Identification information** (name, contact details, professional affiliation)
- **Investor information** (accreditation status, investment preferences, subscription documents)
- **Communications** (emails, inquiries, meeting notes)
- **Website usage data** (IP address, browser type, pages visited)
- **Compliance information** (KYC/AML documentation, regulatory disclosures)

We do **not** collect sensitive personal information unless required by law or necessary for investor onboarding.

2. How We Use Personal Information

We use personal information for the following purposes:

- Assessing investor eligibility and suitability
- Communicating with prospective and existing investors
- Managing subscriptions, capital commitments, and fund operations
- Conducting due diligence, compliance checks, and regulatory filings
- Improving our website, communications, and investor experience
- Meeting legal, regulatory, and reporting obligations

We do **not** sell personal information.

3. Legal Basis for Processing

Depending on the jurisdiction, we may process personal information on the basis of:

- **Contractual necessity** (e.g., subscription agreements)
- **Regulatory compliance** (e.g., AML/KYC requirements)
- **Legitimate interests** (e.g., investor communications, fund administration)
- **Consent**, where required

4. Disclosure of Information

We may share personal information with:

- **Fund administrators**
- **Legal counsel**
- **Auditors**
- **Regulators**
- **Service providers** supporting fund operations
- **Affiliated entities** involved in investment management

All third parties are required to maintain confidentiality and use information only for the purposes for which it was provided.

We do **not** share personal information with unrelated third parties for marketing or commercial purposes.

5. International Transfers

As Verdancia operates across multiple jurisdictions, personal information may be transferred to service providers or affiliates located outside the individual's home jurisdiction. We take reasonable steps to ensure that such transfers comply with applicable data-protection laws.

6. Data Security

We implement administrative, technical, and physical safeguards designed to protect personal information from unauthorized access, disclosure, alteration, or destruction.

While no system is completely secure, we maintain industry-standard measures appropriate for a private investment manager.

7. Data Retention

We retain personal information only as long as necessary to:

- fulfill the purposes for which it was collected,
- comply with legal and regulatory obligations,
- maintain business records, and
- support ongoing investor relationships.

8. Your Rights

Depending on applicable laws, individuals may have rights to:

- access their personal information
- request corrections
- request deletion (subject to regulatory constraints)
- object to certain processing
- withdraw consent (where applicable)

Requests may be submitted using the contact information below. We may require verification of identity before responding.

9. Cookies and Website Tracking

Our website may use cookies or similar technologies to improve functionality and analyze usage. Users may adjust browser settings to block or delete cookies, though some features may not function properly.

10. Third-Party Websites

Our website may contain links to external sites. Verdancia is not responsible for the privacy practices or content of third-party websites.

11. Updates to This Policy

We may update this Privacy Policy periodically. Any changes will be posted on this page with an updated "Last Updated" date. Continued use of our website or services constitutes acceptance of the revised policy.

12. Contact Information

For questions about this Privacy Policy or to submit a data-related request, please contact:

Email: ***info@verdanciacapital.com***