

Numen Capital LLP

Privacy Notice

September 2026

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Who We Are

Numen Capital LLP (the “Firm”, “we”, “us” or “our”) is authorised and regulated by the Financial Conduct Authority.

We are the data controller in respect of the personal data we process.

Our registered office is Eastcastle House, 27-28 Eastcastle Street, London, W1W 8DH.

You can contact us at compliance@numencapital.com or +44 20 3781 7620.

What Personal Data We Collect

We may collect and process personal data in connection with our business activities, including:

Clients and Investors

- name and contact details
- identification and verification information about our clients’ directors, controllers and beneficial owners, including screening results; and
- correspondence and records of our dealings with you

Employees and Contractors

- employment and HR-related information

Special category and criminal offence data is processed only where permitted by law, for example in connection with fitness and propriety assessments.

Business Contacts and Counterparties

- contact details and professional information

Website and Portal

Where you request access to and use our portal, we collect the personal data you provide to us, including your name, contact details and login credentials, together with records of your access and activity on the portal. We may also collect limited technical information automatically, including:

- IP addresses
- browser type and device information
- cookies and similar technologies

This information is used to provide and manage your access to the portal, and to operate, maintain and secure the website and portal.

Recordings of Communications

Where required by regulation, we record telephone conversations and electronic communications relating to transactions, for example with brokers and counterparties.

Sources of Personal Data

We collect personal data directly from you and, where relevant, from other sources, such as fund administrators and other service providers, your employer, public registers, and screening and verification providers.

How We Use Personal Data

We process personal data for the following purposes:

- providing investment management and related services;
- complying with legal and regulatory obligations;
- managing our business operations and relationships; and
- providing and managing access to our portal, and maintaining and securing our systems, website and portal.

Legal Basis for Processing

We rely on one or more of the following legal bases:

- performance of a contract;
- compliance with legal obligations;
- legitimate interests (such as managing our relationships with clients and counterparties, and securing our systems); and
- consent, where applicable.

Where we rely on your consent, you may withdraw it at any time by contacting us. Withdrawing consent does not affect the lawfulness of any processing carried out before its withdrawal.

Some personal data is required for us to comply with our legal and regulatory obligations or to enter or perform a contract. If this information is not provided, we may be unable to provide our services, give you access to our portal, or enter or continue a business relationship.

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Sharing Personal Data

We may share personal data with:

- service providers and professional advisers;
- regulators and authorities (including the Information Commissioner's Office);
- counterparties and other third parties where required; and
- other entities where required by law or regulation.

All sharing is undertaken in accordance with applicable data protection requirements.

International Transfers

Where personal data is transferred outside the United Kingdom, we ensure that appropriate safeguards are in place, such as:

- transfers to countries with adequacy decisions; or
- appropriate contractual protections.

Data Retention

We retain personal data only for as long as necessary to fulfil the purposes for which it was collected, including to meet legal, regulatory and business requirements.

Data Subject Rights

Individuals have the following rights under UK GDPR:

- right of access to personal data;
- right to rectification;
- right to erasure (where applicable);
- right to restrict processing;
- right to data portability;
- right to object to processing; and
- rights relating to automated decision-making.

We do not make decisions based solely on automated processing, including profiling, that produce legal or similarly significant effects.

If you have any questions regarding this Privacy Notice, please contact us at:

Email: compliance@numencapital.com

Telephone: +44 20 3781 7620

Further information about your rights, including the circumstances in which they apply, is available from the Information Commissioner's Office at <https://ico.org.uk/for-the-public>.

You have the right to complain to us if you believe we have not handled your personal data in accordance with data protection law. You can do so by contacting us at compliance@numencapital.com or +44 20 3781 7620. We will acknowledge your complaint within 30 days of receipt and will investigate and respond to you without undue delay.

You also have the right to lodge a complaint with the Information Commissioner's Office if you believe your personal data has been processed in a manner that does not comply with applicable data protection laws. You can do so via <https://ico.org.uk/concerns>.

Data Security

We implement appropriate technical and organisational measures to protect personal data against unauthorised access, loss or misuse.

Updates to this Notice

This Privacy Notice may be updated from time to time. The latest version will be made available on our website.