



Website Privacy Policy
March 2026

1. Who are we?

We are: Oakley Capital Limited

Our contact details are as follows:

Mail: 60 Sloane Avenue, London SW3 3DD

Email: enquiries@oakleycapital.com

Telephone: +44 (0)20 7766 6900

The protection of your privacy is important to us. We want to provide a safe and secure service where we deal with your personal information. This means information that identifies you personally such as your name, contact details, “know your client” information or data that can be linked with such information in order to identify you.

This Privacy Policy describes the types of personal information we collect from our suppliers, clients, borrowers, professional and business contacts, potential investors in new Oakley Capital funds and from visitors and users of www.oakleycapital.com and other websites, platforms, or applications that may link to this privacy policy (together, the “Websites”), how we use the information, with whom we may share it and the choices available to you regarding our use of the information.

We may provide additional information about our privacy practices at other points, for example, when we ask you to provide personal information in connection with a particular service or investment opportunity, and where this will help us provide more relevant and timely information.

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates.

2. Quick guide to contents

- What personal information do we collect about you?
- How do we use your personal information?
- How long do we keep your personal information for?
- Who do we share your personal information with?
- What happens if you do not provide us with the information we request?
- Do we make automated decisions concerning you?
- Do we transfer your personal information outside the EEA?
- What are your rights? – How will we contact you?
- How do you contact us?
- What will happen if you contact Oakley Germany?

3. What personal information do we collect about you?

We collect and process your information in the following ways:

3.1. Information you give us directly

In the course of a business relationship with you (or where such a relationship is possible), we may collect the following types of information:

- personal and business contact information (such as name, postal and email address, and telephone number);
- “know your client” information (such as copy passports, driving licences and utility bills, date and place of birth, National Insurance number and details of investments and offices held); and

- billing and payment information.

The types of information we collect on the Websites includes:

- personal and business contact information (such as name, postal and email address, and telephone number)
- marketing preferences including any consents you have given us; and
- other personal information you submit to us via the Websites.

If you are a potential investor in a new Oakley Capital fund, we may ask that you provide personal information, including:

- personal and business contact information (such as name, postal and email address, and telephone number);
- details of your agents;
- information on the amount you wish to invest; and
- information on your financial status required for client categorisation purposes.

For potential investors which are legal entities, the personal information we collect will relate to the contact persons of such entities.

3.2. Information we collect automatically

When you visit our Websites or open our emails, we may collect certain information by automated means, such as cookies, web server logs, web beacons and JavaScript. The information we may collect in this manner includes IP address, network location, browser characteristics, device characteristics, operating system, referring URLs, information on actions taken on our Websites, and dates and times of Website visits. Please see our [Cookie Policy](#).

If you are a potential investor in a new Oakley Capital fund, we will record details of our interactions with you, including your data room usage (or that of your agents) and records of our meetings and telephone calls with you. For potential investors which are legal entities, the same personal information will be collected in relation to interactions with the contact persons of such entities.

Telephone conversations held with our employees may be automatically recorded in accordance with our regulatory obligations.

4. How do we use your personal information?

We will only use your personal information when the law allows us to. Most commonly, we rely on the following legal bases to process your personal information for the following purposes:

Purpose	Legal Basis
Register and create an account on our Investor Portal and provide you with services.	It is necessary for us to process your personal data in order to perform our contract with you, or to take steps at your request prior to entering into a contract with you.

<p>Facilitate payment for our products and services</p>	<p>It is necessary for us to process your personal data to perform our contract with you</p>
<p>Manage our relationship with you including managing your account, considering whether you would be a suitable investor in a new Oakley Capital Fund, responding to your queries, managing your visit to our business premises or any of our events, handling any complaints or disputes, and providing customer support services.</p>	<p>We have a legitimate interest in managing our business, providing client service and resolving any issues or complaints.</p> <p>In the limited circumstances where this may involve processing your special category data, this is done on the basis of your consent.</p>
<p>Monitor client accounts to prevent, detect, investigate and/or report fraud, terrorism, misrepresentation, security incidents or crime, in accordance with applicable law.</p>	<p>When we have a legal obligation under UK law, we process the data in order to comply with applicable law and regulations.</p> <p>UK only: where it is necessary to process personal data to prevent, detect, or investigate a crime, we rely on our recognised legitimate interests.</p> <p>When we have a legal obligation under laws outside the UK or our processing is not pursuant to a legal obligation, we have a legitimate interest in protecting our business interests and legal rights, and the interests and legal rights of our users.</p>
<p>To conduct due diligence checks (including in relation to international sanctions) on business contacts and to enforce compliance with any agreements, our terms of use and other policies, or otherwise in connection with legal claims, compliance, regulatory and investigatory purposes, as necessary (including disclosure of such information in connection with government agency requests, legal process or litigation);</p>	<p>When we have a legal obligation under UK law, we process the data in order to comply with applicable law and regulations.</p> <p>UK only: where it is necessary to process personal data to prevent, detect, or investigate a crime, we rely on our recognised legitimate interests.</p> <p>When we have a legal obligation under laws outside the UK or our processing is not pursuant to a legal obligation, we have a legitimate interest in protecting our business interests and legal rights, and the interests and legal rights of our users.</p>

<p>Send you marketing and promotional communications by email and SMS in relation to our relevant products and services.</p>	<p>Your consent in relation to direct marketing activities when required under law.</p> <p>Otherwise, we have a legitimate interest in promoting our products and services, and in keeping you informed about updates and offerings that may be relevant to you.</p>
<p>Manage, maintain and operate our website, including to keep it updated, secure and relevant, to develop our business and to inform our marketing strategy.</p>	<p>Your consent, where we use cookies or similar technologies.</p> <p>We have a legitimate interest in operating our business and improving its operation.</p>
<p>For our own internal functions, research and analytics, management and corporate reporting.</p>	<p>We have a legitimate interest in understanding our business and being able to report to management and to develop and improve our products and services and to enhance the way we interact with clients and our business partners.</p>

We may also use the information described above in other ways for which we provide specific notice at the time of collection.

Where we rely on our legitimate interest as a ground for processing your personal information, we carry out a 'balancing test' to ensure that our processing is necessary and that your fundamental rights of privacy are not outweighed by our legitimate interests, before we go ahead with such processing. In the UK, we do not need to conduct a balancing test if we process personal data for a "recognised legitimate interest."

We keep a record of these balancing tests. You have a right to the information contained in these balancing tests on request, and can find out more by contacting us using the details below.

5. How long do we keep your personal information for?

We only retain your information for as long as is necessary for us to use your information as described above, where it is in our legitimate interest, or to comply with our legal obligations. Please be advised that we may retain some of your information after we cease our relationship with you, for instance if this is necessary to meet our legal obligations, such as retaining the information for tax and accounting purposes or to comply with financial services regulations, in each case in accordance with our retention policy.

When determining the relevant retention periods, we will take into account factors including:

- a) our contractual obligations and rights in relation to the information involved;
- b) legal obligation(s) under applicable law to retain data for a certain period of time;
- c) our legitimate interest;
- d) statute of limitations under applicable law(s);

- e) (potential) disputes;
- f) if you have made a request to have your information deleted; and
- g) guidelines issued by relevant data protection authorities.

Otherwise, we securely erase your information once this is no longer needed.

6. Who do we share your personal information with?

6.1. Business processes

In connection with our day-to-day business processes, we share your personal information with third parties who perform functions on our behalf and who also provide services to us, such as professional advisors, IT consultants carrying out testing and development work on our business technology systems and function coordinators. These third parties comply with similar and equally stringent undertakings of privacy and confidentiality.

6.2. Establishing a fund

Personal information relating to potential investors in new Oakley Capital funds (and their representatives) will be shared with third parties who provide services to us in connection with the establishment of the fund, such as administrators, professional advisors and placing agents. These third parties comply with similar and equally stringent undertakings of privacy and confidentiality.

6.3. Sharing with group members and affiliates

We may share your personal information amongst our group members and affiliates in connection with the provision of services to you, for fund management purposes or for internal reasons, such as for business and operational purposes. Our group members and affiliates will only use your personal information for the purposes described in this privacy policy.

6.4. Other instances of sharing

As we continue to develop our business, we may sell or purchase assets. If another entity acquires us or merges with us your personal information will be disclosed to such entity.

Where required we share your personal information with third parties to comply with a legal obligation; when we believe in good faith that an applicable law requires it; at the request of governmental authorities conducting an investigation; to verify or enforce contracts or applicable policies; to detect and protect against fraud, or any technical or security vulnerabilities; to respond to an emergency; or otherwise to protect the rights, property, safety, or security of third parties, visitors to our websites, our businesses or the public. In the UK, this is a recognised legitimate interest when we do this to prevent, detect, or investigate a crime.

7. What happens if you do not provide us with the information we request or ask that we stop processing your information?

If you do not provide the personal information necessary, or withdraw your consent for the processing of your personal information, where this information is necessary for us to provide services to you, we will not be able to provide these services to you.

8. Do we make solely automated decisions concerning you?

No, we do not carry out solely automated decision making to take significant decisions about you.

9. Do we use cookies to collect personal data on you?

To provide better service to you on our Websites, we use cookies to collect your personal data when you browse. Please see our [Cookie Policy](#).

10. Do we transfer your personal information outside of the EEA and UK?

No, we do not transfer your personal information outside of the European Economic Area (EEA) and UK.

Certain of the existing Oakley Capital funds are established outside of the EEA/UK. Investors in those funds should refer to the separate “Oakley Capital Funds Privacy Policy” provided to them. The Oakley Capital Funds Privacy Policy sets out, amongst other things, details of the safeguards we have implemented to ensure that investors’ personal information is, when transferred outside of the EEA/UK, afforded a similar degree of protection as applies in the EEA/UK.

11. What are your rights?

By law, you have a number of rights when it comes to your personal information. Please contact us using the contact details below to exercise any of your rights. Please note that these rights are not without restriction and may not apply in all circumstances.

Further information and advice about your rights can be obtained from the data protection regulator in your country.

11.1. The right to object processing

You have the right to object to certain types of processing, including processing for direct marketing (i.e. if you no longer want to be contacted with potential opportunities). Your objection will be upheld, and we will cease processing your personal data, unless the processing is based on compelling legitimate grounds or is needed for the exercise or defence of legal claims that may be brought by or against us.

11.2. The right to be informed

You have the right to be provided with clear, transparent and easily understandable information about how we use your information and your rights. This is why we’re providing you with the information in this Policy.

11.3. The right of access

You have the right to obtain a copy of your personal data (if we’re processing it), and certain other information (similar to that provided in this Privacy Policy). This is so you’re aware and can check that we’re using your information in accordance with data protection law.

11.4. The right to rectification

You are entitled to have your information corrected if it’s inaccurate or incomplete.

11.5. The right to erasure

This is also known as ‘the right to be forgotten’ and, in simple terms, enables you to request the deletion or removal of your information where there’s no compelling reason for us to keep using it. This is not a general right to erasure; there are exceptions.

11.6. The right to restrict processing

You have rights to 'block' or suppress further use of your information. When processing is restricted, we can still store your information, but may not use it further. We keep lists of people who have asked for further use of their information to be 'blocked' to make sure the restriction is respected in future.

11.7. The right to data portability

You have rights to request us to transmit personal data that you have provided to us, to a third party without hindrance, or to give you a copy of it so that you can transmit it to a third party, where technically feasible. For example, if you decide to switch to a new provider, this enables you to move, copy or transfer your information easily between our IT systems and theirs safely and securely, without affecting its usability.

11.8. The right to lodge a complaint

We would welcome any feedback you may have in relation to the way we handle or process your personal information. Please direct any such feedback to compliance@oakleycapital.com. Oakley Capital is registered with the Information Commissioner's Office (the ICO) in the UK with registration number ZA153418. You have the right to lodge a complaint about the way we handle or process your personal information with us or the ICO, or if you are based outside of the UK, you may instead contact your national data protection regulator, a list of which can be found [here](#).

11.9. The right to withdraw consent

If you have given your consent to anything we do with your personal information, you have the right to withdraw your consent at any time (although if you do so, it does not mean that anything we have done with your personal information with your consent up to that point is unlawful). This includes your right to withdraw consent to us using your personal information for marketing purposes. In some cases, we are able to send you direct marketing without your consent, where we rely on our legitimate interests. You have an absolute right to opt-out of direct marketing, or profiling we carry out for direct marketing, at any time. You can do this by following the instructions in the communication where this is an electronic message, or by contacting us using the details set out below.

These rights may be limited, for example if fulfilling your request would reveal personal data about another person, or if you ask us to delete information which we are required by law or have compelling legitimate interests to keep.

We usually act on requests and provide information free of charge, but may charge a reasonable fee to cover our administrative costs of providing the information for:

- baseless or excessive/repeated requests, or
- further copies of the same information.

Alternatively, we may be entitled to refuse to act on the request.

If you wish to exercise any of these rights, please contact us at the contact details set out below.

Please consider your request responsibly before submitting it. We'll respond as soon as we can. Generally, this will be within one month from when we receive your request but, if the request is going to take longer to deal with, we'll come back to you and let you know.

12. Contact

12.1. How will we contact you?

We may contact you by phone, post, email or social media as applicable based on the details you have provided us. Where such contact is for the purposes of marketing, we will contact you via the means for which you have provided consent.

If you prefer a particular contact means over another please just let us know.

12.2. How can you contact us?

If you have any enquiries you can contact us at: enquiries@oakleycapital.com or by writing to us at:

Compliance team

Oakley Capital Limited

60 Sloane Avenue

London

SW3 3DD

12.3. What happens if you contact Oakley Germany?

This Website is operated by Oakley Capital Limited. However, if you get in touch with us via our contact form, your request may be directed to our German entity which then acts as independent controller of your personal information. You may reach our German entity as follows:

Oakley Capital GmbH

Alter Hof 4

80331 München

Deutschland

+ 49 89 24205 9300

Email: helene.hess@oakleycapital.com

In such case, this Privacy Policy shall apply accordingly to any processing of your personal information by Oakley Capital GmbH.