

GLIL Infrastructure LLP

Privacy Notice

1. Introduction

GLIL Infrastructure LLP (GLIL) is categorised as an “alternative investment fund” (AIF) within the meaning of the Alternative Investment Fund Managers Directive (AIFMD) and is an unauthorised AIF as defined in the Financial Conduct Authority (FCA) rules. GLIL invests in infrastructure and is structured as a limited liability partnership (LLP). GLIL has appointed Local Pensions Partnership Investments Ltd (LPPI), which is authorised and regulated by the FCA, as its Alternative Investment Fund Manager (AIFM) for regulatory purposes.

GLIL is registered with the Information Commissioner’s Office (ICO) under registration number ZB633009.

2. Purpose of this Privacy Notice

GLIL respects your privacy and is committed to protecting your personal data. This privacy notice will inform you as to how we look after your personal data and tell you about your privacy rights and how the law protects you.

We may process your personal data in a number of ways over the course of our business relationship with you. It is important that you read this notice so that you are fully aware of how and why we are using your data. If you have any questions about this notice, including any requests to exercise your legal rights, please contact us as indicated below.

3. Our contact details

Name: Alexandra De Maria

Address: GLIL Infrastructure LLP, First Floor, 1 Finsbury Avenue, London, EC2M 2PF

E-mail: info@glil.co.uk

4. What type of information we have

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Basic information:** such as your name (including name prefix or title), the company you work for, your title or position and your relationship to our other contacts (if applicable).
- **Contact information:** such as your postal address (for billing or delivery purposes), email address and phone number(s).
- **Financial data:** such as bank account and payment card details necessary to process payments.

- **Transaction data** such as details about payments to and from you.
- **Any other information:** including information relating to you that you may provide to us.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your business relationship with us.

5. How we get the information and why we have it

Most of the personal information we process is provided to us directly by you for one of the following reasons:

- communicating with you
- identifying you;
- to administer your job application with us and considering your suitability for the relevant role, conducting verification and vetting;
- to liaise with portfolio companies, suppliers and group companies;
- conduct our regular reporting activities on the performance of our business;
- process any request you may have made;
- maintain our IT systems and manage hosting of our data;
- deal with any legal disputes which may involve you or the company you work for;
- manage our business, including for accounting and auditing purposes;
- to administer our contract with you and/or our portfolio companies (if applicable);
- fulfil our contractual and other obligations to candidates, suppliers, contractors and other business partners; and
- meet our legal obligations.

We may receive personal information indirectly from the following sources in the following scenarios. These include, but are not limited to:

- employment or placement agents for recruitment purposes within our structure and/or portfolio companies
- third parties, websites, publicly available sources, or forums for the purposes of business introductions, meetings or sharing information about our business

6. What lawful bases we rely on to process your personal data

We are required by law to have a permitted reason or justification (a 'legal basis') for processing personal data. Under the General Data Protection Regulation (GDPR), the lawful bases we rely on for processing this information are:

- **Contractual obligations:** where we need to perform the contract we are about to enter into or have entered into with you or the organisation that you work for;
- **Legitimate interests:** where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests; and/or
- **Legal obligations:** where we need to comply with a legal obligation.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Generally, we do not rely on consent as a legal basis for processing your personal data. If consent is provided, it can be withdrawn by the data subject at any time.

7. What we do with the information we have

For examples of how we use the information that you have given, please see [How we get the information and why we have it](#).

From time to time, we may ask third parties to carry out certain business functions for us, such as the administration of our payroll and our IT support. We may need to disclose your data strictly on a need to know basis to our service and professional providers, contractors, suppliers and other parties such as banks, brokers, registrars, lawyers, accountants, actuaries, payroll, pension providers, life assurance provider and HMRC. Some examples are list below:

- Zoho – client relationship management (CRM) database
- Local Pensions Partnership Investments Ltd – the AIFM of GLIL
- ASC Technologies – call recording of certain Microsoft Teams calls, including chat and Teams 'landline'
- KeepIT – cloud data storage solution
- NetPayroll – payroll provider
- Nest – workplace pension scheme
- Canada Life – income protection and life assurance provider
- Aon – insurance broker

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

The data we collect from you may be transferred to, and stored at, a destination outside the European Economic Area (EEA) or the United Kingdom (UK). It may also be processed by staff operating outside the EEA or the UK who work for us or third parties engaged in, among other things, the provision of support services to us. By submitting your personal data, you acknowledge this transfer, storing or processing.

Automated decision-making and profiling

At present, your data is not used in any automated decision making (a decision made solely by automated means without any human involvement) or profiling (automated processing of personal data to evaluate certain conditions about an individual).

8. How we keep your information secure

We have put in place appropriate physical and technical measures to safeguard the data we collect. In addition, we limit access to personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process data on our instructions and are subject to a duty of confidentiality.

However, please note that although we take appropriate steps to protect personal data, no device, computer system, transmission of data or wireless connection is completely secure and, therefore, we cannot guarantee the absolute security of personal data, shared with us over the internet.

We have in place procedures to deal with any suspected personal data breach and will notify you and the ICO of a breach where we are legally required to do so. If you have any particular concerns about your information, please see [Our contact details](#).

We will only retain personal data for as long as necessary to fulfil the purposes for which we collected it, including satisfying any legal, accounting or reporting requirements.

Once our processing of your personal data is no longer necessary, we will securely destroy your personal information in accordance with applicable laws and regulations.

9. Your data protection rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data, as follows:

- **Your right of access** - You have the right to ask us for copies of your personal information (commonly known as a *data subject access request*).
- **Your right to rectification** - You have the right to ask us to rectify information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.
- **Your right to erasure** - You have the right to ask us to erase your personal information in certain circumstances.
- **Your right to restriction of processing** - You have the right to ask us to restrict the processing of your information in certain circumstances.
- **Your right to object to processing** - You have the the right to object to the processing of your personal data in certain circumstances.
- **Your right to data portability** - You have the right to ask that we transfer the information you gave us to another organisation, or to you, in certain circumstances.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact us in writing (which may be by email). Please see [Our contact details](#).

Fees

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

Time limit to respond

We try to respond to all legitimate requests within **one month**. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

Please contact us the details above if you wish to make a request.

10. How to complain

You have the right to make a complaint at any time to the ICO, if you feel unhappy with the way we use your data. We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance. Please see [Our contact details](#).

The ICO's address and contact details are:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Helpline number: 0303 123 1113

ICO website: <https://www.ico.org.uk>

11. Third-Party Links

Our website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

12. Changes to this document

We may change this privacy notice from time to time. Please contact us to ensure you are aware of our most up-to-date notice.