

Keen Venture Partners LLP (registered address Michelin House, Office 121, 81 Fulham Road, SW3 6RD, London, United Kingdom) is authorised and regulated by the Financial Conduct Authority (FRN number: 670612).

Keen Venture Partners inaugural fund benefits from the support of the European Union under the Equity Facility for Growth established under Regulation (EU) No 1287/2013 of the European Parliament and the Council establishing a Programme for the Competitiveness of Enterprises and small and medium enterprises (COSME) (2014-2020).

**Legal docs enclosed:**

Code of Conduct

GDPR Privacy Notice for Fund I

GDPR Privacy Notice for Fund II

SFDR Disclosures



## **Code of Conduct (Anti-Discrimination and Harassment Policy)**

### **Purpose and scope**

At Keen we believe in human capital first, which also means we treat people with respect and equality. We are committed to providing a healthy work environment and culture and extend those commitments to our dealings with all external parties. Whether you work in Keen or are interacting with us, you should at all times feel welcomed, respected and included.

The perceived power relationship between investors and founders should be recognised by all investors and they should be mindful never to abuse this position when interacting on potential investments or post investment.

We expect everyone associated with Keen to abide by this code of conduct, that includes but is not limited to; employees, contractors, founders, funders, investors, mentors, partners, advisors and attendees of our events. The code of conduct also applies in any setting associated with Keen, such as offices, work events, social outings, conferences, homes, lodgings, phone calls, video conferences, emails, chat, social media, blogs, or other online communications.

### **Unacceptable behaviours**

#### ***Discrimination and harassment***

Discrimination is unfairly treating a person or group of people differently from other people. Harassment is unwanted and unwelcome words, deeds, actions, gestures, or behaviours that make someone feel uncomfortable. Discrimination on the basis of age, disability, gender reassignment, marriage and civil partnership pregnancy and maternity, race, religion or belief, sex (gender) and sexual orientation is not only illegal it is wrong and unacceptable. Types of discrimination include direct discrimination (directly treating someone less favourably), indirect discrimination (discriminating a group who share a certain protected characteristic to put them at a disadvantage against those without the characteristic), harassment (unwanted conduct towards an individual) and victimisation (disadvantage to an employee who for example made an allegation of discrimination). This includes but is not limited to:

- Negative comments or discrimination based on age or family role
- Asking a job applicant about their health, absences from work or disability before offering them employment
- Deliberate mis gendering (e.g., using different pronouns than requested)
- Ignoring an employee for promotion because they are in a civil partnership
- Discriminating against pregnant people or mothers
- Racial or ethnic slurs
- Discriminatory comments against members of marginalised religions as a group
- Misogynist comments
- Homophobic or transphobic comments or slurs

### ***Sexual Harassment***

Sexual harassment means any unwanted, unwelcome or uninvited behaviour of a sexual nature which a reasonable person in the circumstances would find humiliating, intimidating or offensive. Sexual harassment doesn't have to be repeated or ongoing. Sexual harassment takes many forms, from sexual comments to actual physical violence. Keen has a zero-tolerance to any form of sexual harassment. Some examples of sexual harassment include:

- Verbal harassment: Sexual or sexually suggestive comments, jokes, insults, metaphors, pranks or gestures
- Propositions: invitations or advances including repeated requests for dates, drinks or personal contact, including condescending remarks or inappropriate sexually-themed communication in person or online
- Sexual assault or coercion, including sexual activity under pressure or threat, for a reward, or in a context where it is difficult for the recipient to say no. This may include requesting sexual activity in exchange for reward including funding, referrals, future employment, promotion, or invitation to exclusive events
- Non-verbal assault can take the form of touching, leering, brushing against the body or displaying sexually suggestive objects, pictures, posters or cartoons

### ***Other Types of Harassment***

- Advocating for or supporting any unacceptable behaviour
- Deliberately and repeatedly acting in a manner, either directly or indirectly, which is contrary to the terms (or the spirit) of this code of conduct
- Threatening, rewarding, or otherwise coercing someone to not report or lie about a violation of the code of conduct
- Physical conduct such as assault

## Reporting and investigating

Any individual either external or internal to Keen Venture Partners that believes an incident or incidents of harassment or discrimination has taken place, should report this in the knowledge that it will be investigated swiftly and without prejudice.

All complaints can be emailed to Sara McMunn, Operating Partner of Keen Venture Partners, [sara@keenventurepartners.com](mailto:sara@keenventurepartners.com). Alternatively, please report it to anyone within Keen whom you feel comfortable discussing the matter with and they should then escalate the complaint.

Reports will be acknowledged within three business days and actioned within 10 business days. Depending on the degree of violation, actions may include:

- Nothing – if no violation has occurred
- Verbal warning
- Written warning
- Temporary or permanent ban from events/spaces/boards
- Suspension
- Removal of responsibilities
- Termination of employment
- Reporting to the authorities

# GDPR Privacy Notice

## Data protection privacy notice

Keen Venture Partners are committed to protecting your personal information and ensuring we respect your privacy. When used in this notice, “Keen Venture Partners” or “we” means Keen Venture Partners LLP or any of its subsidiaries or related companies. This Privacy Notice explains how we will look after and use any personal information that we collect about you. This policy may be amended or updated to reflect changes in our practices from time to time. We suggest that you regularly check this page to review any change we might make in accordance with the terms of this Policy. This policy was last updated on 22 May 2018.

## What is personal information?

Personal information means any information about you from which you can be identified. Examples of personal information include your name, home address, national insurance number, date of birth, telephone number and e-mail address but it also includes other pieces of information which can be used to identify you, either directly or indirectly, such as a cookie.

## Who we are

Keen Venture Partners LLP is the Controller of the personal information you provide to us. If you have any questions about this Privacy Notice or the information we hold about you please contact us using the details set out below:

Full name of legal entity: Keen Venture Partners LLP

Email address: sara@keenventurepartners.com

Postal address: Michelin House, Office 121, 81 Fulham Road, London, SW3 6RD

Contact telephone numbers: +44 (0)20 3826 0314

You have the right to make a complaint at any time to the Information Commissioner’s Office (ICO), the UK supervisory authority for data protection issues. We would however appreciate the chance to deal with your concerns before you approach the ICO, so please contact us in the first instance.

## What types of information do we use?

We collect information in the course of providing our financial services to you. The information which we collect, use, store and transfer about you are:

- Employment details (job title, company name, address etc.);
- Payment information (bank account, credit card or other details);
- Educational history;
- Employment or work history/background;
- Information on trading or other financial activity;
- Contractual/contact information (i.e. our ‘history’ together – services provided or discussed);

- 
- Instructions or requests (for example if you ask for investment advice or to carry out a trade);
  - Financial information (financial position and history);
  - Documentary data (things can include passport or drivers licence or other forms of identification);
  - Public records (or openly accessible data) such as the Electoral Register;
  - Social and or demographic (profession, work, goals, nationality, income or family situation)
  - Historical information i.e. previous names and addresses;

Keen Venture Partners does not generally collect or process your Sensitive Personal data. Should we need to do so it would be because:

- The Processing is necessary for compliance with a legal obligation;
- The Processing is necessary for the detection or prevention of crime;
- You have made the Sensitive Personal data public; or
- We have obtained your consent priori to Processing your Sensitive Personal data

## Consequences of not providing some types of information

Where we need to collect your personal information by law, or under the terms of a contract we have with you, and you fail to provide that information when requested, we may not be able to provide the goods or services you asked for. In this case we may have to cancel the product or services but we will tell you if this is the case.

## How do we collect information about you?

Typically, Keen Venture Partners will collect information from you when you contact us directly or provide information in order for us to provide our products and services. We collect information from and about you in the following ways primarily through **direct interactions** when you give us your personal information by filling in forms or during correspondence with us. This includes when you:

- Subscribe to our funds; or
- Meet with us in person or talk to us face to face.

## How we will use your personal information

We only obtain, use and keep personal information where we need it for a specific purpose. We set out in the table below the ways in which we plan to use your personal information. We are only able to use your personal information if we have a proper legal reason or basis for doing so. This is called a legal basis and the regulations require that we have a legal basis so that your privacy is protected. Most commonly we will use your information in the following ways:

- We have a **contract** with you. For example, we manage a fund for which you are an investor in accordance with the constitutional documents of the fund.
- We have a **legal obligation**. We need to use your personal information to comply with laws that assist in the prevention of financial crime and to comply with regulatory obligations. For example this might include confirming your identity and source of wealth, as well as ensuring we provide you with necessary information so you understand the risk of the financial services we can provide.

- We, or a third party, have a **legitimate interest** in processing the information and your interests and fundamental right do not override those interests. For example, processing your information to source deals.

We set out in the table below all the ways we plan to use your personal information and the legal bases we rely on to do so. We also explain what our legitimate interests are where appropriate:

Purpose	Lawful basis for processing including our legitimate interests
To facilitate investment into our funds and co-investment opportunities and comply with our obligations as manager as set out in the constitutional documents of the funds.	To fulfil our contact with investors
To facilitate investment into portfolio companies and provide advice and assistance to help our portfolio companies grow.	To fulfil our investment agreements with management companies
To acquire and exit investments	To fulfil the purchase or sale agreement
To purchase services from our suppliers	To fulfil our contracts with suppliers
To comply with our KYC and customer due diligence obligations.	To fulfil our regulatory obligations
We process the personal data of a wide variety of business contacts for the purposes of conducting key parts of venture capital business, such as fundraising, generating deal flow, and recruiting management teams.	Necessary for our legitimate interests – to conduct the business of a venture capital fund manager

We will only use your personal information for the reason for which we collected it. We will only use it for another reason if we believe that new reason is compatible with the original purpose. If we do need to use your personal information for a non-related purpose we will tell you about it and explain the legal basis which allows us to do so.

## Who we share your information with

We may need to provide information to third parties for a variety of reasons, for example, we may need to provide information to assist in the detection or prevention of crime or for the purpose of safeguarding national security. Please refer to the table in the section ‘How we will use your personal information’ which explains how we use your data. The third parties we share your information with are as follows:

- The funds you are invested in
- Our service providers such as accountants, fund administrators, compliance consultants, professional advisers and lawyers
- Counterparties to a transaction

---

## **Sending your information outside of the EEA**

The regulations which have been put in place to protect your privacy apply throughout the EEA. The EEA is the European Economic Area which includes all the countries in the European Union plus Iceland, Liechtenstein and Norway. This means that any country within the EEA must meet the same privacy standards as the United Kingdom. All the personal information that we hold about you will be processed in the EEA.

## **Storing your information**

As a financial services provider we will typically have a contract with you and will need to keep your personal information (updated to ensure accuracy) to fulfil our contract. We also need to comply with EU and UK law, which often requires us to keep certain records - which will include certain personal information – for several years.

Our policy is to keep records on prospective investors, management teams and other business contacts indefinitely we may wish contact long standing contacts about a particularly relevant opportunity in the future, and in the context of venture capital and private equity business there is no way to predict when such an opportunity might arise. We will ensure all records are safely destroyed if we no longer need to retain them. We review our retention periods for personal information on a regular basis. We will tell you if we change the retention period.

## **Your rights**

You are provided with a number of different rights under the data protection laws in relation to your personal information. These allow you:

- To access your information;
- To request we correct your information;
- To request that we erase your information;
- To object to the processing of your information;
- To request a restriction in the processing of your information;
- To request a transfer of your information;
- Complain to the Information Commissioner's Office; and
- To withdraw your consent.

If you wish to exercise any of these rights please call us on +44 (0)20 3826 0314, email [sara@keenventurepartners.com](mailto:sara@keenventurepartners.com) or write to the Head of Compliance at Michelin House, Office 121, 81 Fulham Road, SW3 6RD. Please note that you will not have to pay a fee to access your personal information or to exercise any of the other rights. We may, however, charge a reasonable fee if your request is clearly unfounded, repetitive or excessive or we may refuse to deal with your request. We may also need to seek further information from you to confirm your identity before we release any personal information. This does not affect your right to make a complaint.





## GDPR Privacy Notice – External

**Date:** October 2021

**Version:** 1.0

*Keen Venture Partners B.V. Passeerdersgracht 19A, 1016 XG, Amsterdam, The Netherlands  
T: +31 (0) 20 240 4451, [www.keenventurepartners.com](http://www.keenventurepartners.com)*

Keen Venture Partners BV is a Dutch private limited liability company registered in the Netherlands with registered number 65174038. Keen Venture Partners BV is registered with the Dutch Authority for the Financial Markets (AFM).

---

## Data protection privacy notice

Keen Venture Partners are committed to protecting your personal information and ensuring we respect your privacy. When used in this notice, “Keen Venture Partners” or “we” means Keen Venture Partners B.V. or any of its subsidiaries or related companies. This Privacy Notice explains how we will look after and use any personal information that we collect about you. This Privacy Notice may be amended or updated to reflect changes in our practices from time to time. We suggest that you regularly check this page to review any change we might make in accordance with the terms of this Privacy Notice. This Privacy Notice was last updated on 1 October 2021.

This Privacy Notice is intended to ensure compliance with European and Dutch privacy legislation and regulations, including but not limited to, the General Data Protection Regulation (**GDPR**), and the Dutch GDPR Implementation Act (*Uitvoeringswet AVG*, **UAVG**). Capitalized terms not otherwise defined in the text have the meaning given thereto in the GDPR.

### What is personal information?

Personal information means any information about you from which you can be identified. Examples of personal information include your name, home address, national insurance number, date of birth, telephone number and e-mail address but it also includes other pieces of information which can be used to identify you, either directly or indirectly, such as a cookie.

### Who we are

Keen Venture Partners B.V. is the Controller of the personal information you provide to us. If you have any questions about this Privacy Notice or the information we hold about you please contact us using the details set out below:

Full name of legal entity: Keen Venture Partners B.V.

Email address: [sara@keenventurepartners.com](mailto:sara@keenventurepartners.com)

Postal address: Passeerdersgracht 19A, 1016 XG, Amsterdam, Netherlands

Contact telephone numbers: +31 (0)20 240 4451

You have the right to make a complaint at any time to the Dutch Data Protection Authority, the supervisory authority for data protection issues. Notwithstanding your right to lodge such complaint we would appreciate the chance to deal with your concerns before you approach them, as such we kindly request you to contact us in the first instance.

---

## What types of information do we use?

We collect information in the course of providing our financial services to you. The information which we collect, use, store and transfer about you are:

- Employment details (job title, company name, address etc.);
- Payment information (bank account, credit card or other details);
- Educational history;
- Employment or work history/background;
- Information on trading or other financial activity;
- Contractual/contact information (i.e. our 'history' together – services provided or discussed);
- Instructions or requests (for example if you ask for investment advice or to carry out a trade);
- Financial information (financial position and history);
- Documentary data (things can include passport or drivers licence or other forms of identification);
- Public records (or openly accessible data) such as the Electoral Register;
- Social and or demographic (profession, work, goals, nationality, income or family situation)
- Historical information i.e. previous names and addresses;

Keen Venture Partners does not generally collect or process your special categories of personal data. Should we need to do so it would be because:

- The Processing is necessary for compliance with a legal obligation;
- The Processing is necessary for the detection or prevention of crime;
- You have made specific data public; or
- We have obtained your consent prior to Processing such data.

## Consequences of not providing some types of information

Where we need to collect your personal information by law, or under the terms of a contract we have with you, and you fail to provide that information when requested, we may not be able to provide the goods or services you asked for. In this case we may have to cancel the product or services but we will tell you if this is the case.

## How do we collect information about you?

Typically, Keen Venture Partners will collect information from you when you contact us directly or provide information in order for us to provide our products and services. We collect information from and about you in the following ways primarily through **direct interactions** when you give us your personal information by filling in forms or during correspondence with us. This includes when you:

- Subscribe to our funds; or
- Meet with us in person or talk to us face to face.

---

## How we will use your personal information

We only obtain, use and keep personal information where we need it for a specific purpose. We set out in the table below the ways in which we plan to use your personal information. We are only able to use your personal information if we have a proper legal reason or basis for doing so. This is called a legal basis and the regulations require that we have a legal basis so that your privacy is protected. Most commonly we will use your information in the following ways:

- We have a **contract** directly with you. For example, we manage a fund for which you are an investor in accordance with the constitutional documents of the fund.
- We have a **contract** with the company you represent and have a legitimate interest to process your information. For example, we manage a fund for which you act as a representative and need to process your personal data to conclude and execute the agreement and manage the investments on behalf of the company
- We have a **legal obligation**. We need to use your personal information to comply with laws that assist in the prevention of financial crime and to comply with regulatory obligations. For example this might include confirming your identity and source of wealth, as well as ensuring we provide you with necessary information so you understand the risk of the financial services we can provide.
- We, or a third party, have a **legitimate interest** in processing the information and your interests and fundamental right do not override those interests. For example, processing your information to source deals.

We set out in the table below all the ways we plan to use your personal information and the legal bases we rely on to do so. We also explain what our legitimate interests are where appropriate:

Purpose	Lawful basis for processing including our legitimate interests
To facilitate investment into our funds and co-investment opportunities and comply with our obligations as manager as set out in the constitutional documents of the funds.	To fulfil our contact with investors
To facilitate investment into portfolio companies and provide advice and assistance to help our portfolio companies grow.	To fulfil our investment agreements with management companies
To acquire and exit investments	To fulfil the purchase or sale agreement

To purchase services from our suppliers	To fulfil our contracts with suppliers
To comply with our KYC and customer due diligence obligations.	To fulfil our regulatory obligations
We process the personal data of a wide variety of business contacts for the purposes of conducting key parts of venture capital business, such as fundraising, generating deal flow, and recruiting management teams.	Necessary for our legitimate interests – to conduct the business of a venture capital fund manager

We will only use your personal information for the reason for which we collected it. We will only use it for another reason if we believe that new reason is compatible with the original purpose. If we do need to use your personal information for a non-related purpose we will tell you about it and explain the legal basis which allows us to do so.

### **Who we share your information with**

We may need to provide information to third parties for a variety of reasons, for example, we may need to provide information to assist in the detection or prevention of crime or for the purpose of safeguarding national security. Please refer to the table in the section ‘How we will use your personal information’ which explains how we use your data. The third parties we share your information with are as follows:

- The funds you are invested in
- Our service providers such as accountants, fund administrators, compliance consultants, professional advisers and lawyers
- Counterparties to a transaction
- The investment vehicles to which KEEN Venture Partners (envisages to) makes any capital commitment
- (regulatory) authorities (such as tax authorities, financial intelligence units and supervisory authorities), competent courts, governmental bodies

### **Sending your information outside of the EEA**

The regulations which have been put in place to protect your privacy apply throughout the EEA. The EEA is the European Economic Area which includes all the countries in the European Union plus Iceland, Liechtenstein and Norway. This means that any country within the EEA must meet the same privacy standards as the Netherlands. All the personal information that we hold about you will be processed in the EEA.

### **Storing your information**

As a financial services provider we will typically have a contract with you and will need to keep your personal information (updated to ensure accuracy) to fulfil our contract. We also need to comply with

---

EU and Dutch law, which often requires us to keep certain records - which will include certain personal information – for several years. In general, we shall keep personal data related to any contracts with you or the company you represent and investments during the lifecycle of the contract or Investment and for 7 years after termination thereof.

Our policy is to keep records on prospective investors, management teams and other business contacts for a period of 5 years after our last contact or sooner if you inform us that we may no longer store your personal data for these purposes. We may wish to contact long standing contacts about a particularly relevant opportunity in the future, and in the context of venture capital and private equity business there is no way to predict when such an opportunity might arise.

We will ensure all records are safely destroyed if we no longer need to retain them. We review our retention periods for personal information on a regular basis. We will tell you if we change the retention period. The aforementioned retention periods may be extended in the event that this is necessary in order to safeguard our legal position or to defend our rights, e.g. in the event of a legal dispute or where necessary to determine, defend or exercise our legal rights and position.

## Your rights

You are provided with a number of different rights under the data protection laws in relation to your personal information. These allow you:

- To access your information;
- To request we correct your information;
- To request that we erase your information;
- To object to the processing of your information;
- To request a restriction in the processing of your information;
- To request a transfer of your information;
- Lodge a complaint with the Dutch Data Protection Authority; and
- To withdraw your consent.

If you wish to exercise any of these rights please call us on +31 (0)20 240 4451, email [sara@keenventurepartners.com](mailto:sara@keenventurepartners.com) or write to the Head of Compliance at Passeerdersgracht 19A, 1016 XG, Amsterdam, The Netherlands. Please note that you will not have to pay a fee to access your personal information or to exercise any of the other rights. We may, however, charge a reasonable fee if your request is clearly unfounded, repetitive or excessive or we may refuse to deal with your request. We may also need to seek further information from you to confirm your identity before we release any personal information. This does not affect your right to make a complaint.

## Keen Venture Partners SFDR disclosures

### Article 3, Sustainability risks:

Keen Venture Partners (Keen) in its capacity as a manager, integrates the evaluation of sustainability risk, pursuant to Article 3 of SFDR (EU 2019/2088) into the internal processes, including the investment decision making process as set forth in this document. The Company's assessment of sustainability risk is defined as :

***A sustainability risk means an environmental, social or governance event or condition that, if it occurs, could cause a negative material impact on the value of the investment.***

Keen has traditionally considered a number of factors when identifying investee opportunities, in its investment decision-making and during the due diligence process. Investments are sought across businesses that should not result in any large scale resource depletion, waste, pollution or deforestation. Investee companies would also be expected to comply with all applicable laws in their country of domicile, including environmental, labour and human rights laws.

Keen Venture Partners investment process integrates consideration of sustainability risks across the phases of the investment cycle, from initial due diligence to investment and monitoring as follows:

**Diligence Process:** Our Due Diligence pre-investment by the Investment Managers reviews all aspects of the company including the governance structure, employee relations & welfare and would flag any environmental impacts, social or governance concerns.

**Investment Monitoring** Post Investment Keen is on the Board (for most investments) or receives regular updates by which Keen monitors and discusses any ESG concerns or areas for improvement.

**Article 4, Principal Adverse Impacts: No consideration of sustainability adverse impacts:**

The Company, does not at this stage, consider principal adverse impact factors in the delivery of its services. The nature of the investment activity (technology and SME) and size and scale of operations does not require a focus on assessment of Principal Adverse Impacts. It is anticipated that should the investment focus and strategy change, then a consideration of Principal Adverse Impacts will be considered.

**Article 5, Remuneration disclosure:**

Keen has set forth the remuneration model applicable to its own business. As part of the integration of sustainability risks, set out in its investment process, Keen instils a culture of alignment with ESG across its own teams and avoids remuneration schemes that could encourage 'greenwashing' in the selection of investments.