



Data Protection & Data Processing Policy

(SIARDICO Framework, Registration, Capital Investment & Returns)

Last updated: May 2026

This Data Protection and Data Processing Policy (“**Policy**”) governs how **SIARDICO UK Ltd** and its affiliated entities process personal data **strictly within the context of the SIARDICO Framework**, including:

- The **SIARDICO Framework / Partners Agreement and Business/Project Execution Plans (May 2025)**
- Partner and investor **registration and onboarding**
- **Capital contributions**, additional funding, and financing arrangements
- **Return of capital, preferred returns, profit distributions, and exit events**

This Policy is issued in support of, and must be read in conjunction with, the **Partners Agreement, investment documentation, and related contractual instruments**.

1. Relationship to Other Policies

This Policy **does not govern**:

- General website browsing
- Cookies, analytics, or tracking technologies
- Marketing activities or newsletters
- Non-investment communications

Those activities are governed separately by the **SIARDICO Privacy Policy**, available at: <https://www.siardico.com/privacy-policy>

In the event of inconsistency, **the document most specific to the data processing activity shall prevail.**

2. Data Controllers and Operating Structure

Personal data is processed within the SIARDICO joint venture structure, comprising:

- **SIARDICO UK Limited** – UK HoldCo, parent investment and governance entity
- **SIARDICO Limited (Sierra Leone)** – Operational subsidiary (OpCo)

Together, these entities act as **joint or separate data controllers** depending on the nature of the processing, in accordance with the SIARDICO Framework and Partners Agreement [1](#).

Contact details:

Registered address: [Insert]

Email: [Insert data protection / compliance email]

3. Scope and Application of This Policy

This Policy applies **only** to individuals who:

- Are **Partners**, co-investors, or participants in the SIARDICO Joint Venture
- Make or commit to **capital contributions**, whether initial or additional
- Receive or are entitled to **returns, distributions, or exit proceeds**
- Hold governance, reporting, or contractual rights under the SIARDICO Framework

It applies throughout the **full investment lifecycle**, including establishment, development, operation, distribution, reinvestment, and exit.

4. Personal Data Processed Under the SIARDICO Framework

4.1 Partner & Investor Registration Data

Collected to establish and administer participation in the Joint Venture:

- Full legal name
- Contact details

- Residential or business address
- Date of birth (where legally required)
- Corporate affiliation, role, or capacity
- Identity verification documentation (where required by law or contract)

4.2 Capital Contribution & Investment Data

Processed in line with Clauses 4 and 5 of the Partners Agreement [1](#):

- Capital contribution amounts and schedules
- Tranche payments and funding status
- Records of additional or pro-rata contributions
- Ownership, participation, or dilution records
- Banking and payment details
- Tax and regulatory information (where required)

4.3 Returns, Profit Distribution & Exit Data

Processed in accordance with Clause 9 (Profit Distribution) and Clause 17 (Exit) [1](#):

- Return of capital records
- Preferred return calculations (where applicable)
- Profit distribution amounts and schedules
- Reinvestment elections
- Exit proceeds and distribution statements
- Audit, accounting, and reconciliation records

5. Lawful Bases for Processing

Personal data is processed under one or more of the following lawful bases:

- **Performance of a contract** – Partners Agreement and investment documentation

- **Legal obligation** – accounting, taxation, regulatory, and statutory compliance
- **Legitimate interests** – governance, transparency, reporting, and risk management
- **Consent** – where explicitly required for specific processing activities

6. Purpose Limitation

Personal data within the scope of this Policy is processed **exclusively** to:

- Administer the Joint Venture under the SIARDICO Framework
- Manage capital contributions and financing
- Calculate and distribute returns and profits
- Fulfil transparency and reporting obligations to Partners
- Maintain accurate governance, audit, and regulatory records
- Comply with applicable laws in England & Wales and Sierra Leone

Personal data is **not** used for unrelated commercial, marketing, or profiling purposes.

7. Data Sharing & Processors

Personal data may be shared with third parties strictly as necessary to fulfil the SIARDICO Framework, including:

- Banking and payment institutions
- Accountants, auditors, and professional advisers
- Legal counsel and regulatory advisers
- Secure IT and financial systems providers

All such parties act under **contractual confidentiality and data protection obligations**, consistent with Clause 12 (Confidentiality) of the Partners Agreement [1](#).

8. International Data Transfers

Given the UK–Sierra Leone operating structure, personal data may be transferred internationally.

Where this occurs, SIARDICO ensures appropriate safeguards, including:

- UK adequacy assessments (where applicable)
- Standard Contractual Clauses (SCCs)
- Other lawful transfer mechanisms recognised by UK GDPR

9. Data Retention

Personal data is retained in accordance with:

- The duration of the Joint Venture or investment participation
- Statutory retention periods for financial and tax records
- Audit, dispute resolution, and regulatory requirements

Data is securely deleted or anonymised once no longer required.

10. Data Subject Rights

Subject to applicable law, data subjects may exercise rights to:

- Access personal data
- Rectification of inaccuracies
- Erasure (where legally permissible)
- Restriction or objection to processing
- Data portability
- Withdrawal of consent (where applicable)

Requests should be directed to:

 admin@siardico.com

Complaints may be lodged with the **UK Information Commissioner's Office (ICO)** or the relevant supervisory authority.

11. Security Measures

SIARDICO implements appropriate **technical and organisational measures**, including:

- Restricted, role-based access to sensitive investment data
- Secure financial and record-keeping systems
- Confidentiality controls aligned with JV obligations
- Ongoing review of data protection practices

12. Children's Data

Participation in the SIARDICO Framework is limited to adults.

We do not knowingly process personal data of individuals under 16.

13. Amendments


This Policy may be updated to reflect changes to the SIARDICO Framework, regulatory requirements, or operational practices.


The current version will always be made available with an updated revision date.

14. Contact

For matters relating to this Policy and data processing under the SIARDICO Framework:

SIARDICO Ltd

 Email: admin@siardico.com

 Website: <https://www.siardico.com>