



# Investor Data Processing Summary

## SIARDICO Framework

**This summary explains, in plain English, how SIARDICO uses your personal data when you invest or participate as a Partner.**

It is a short guide only. Full details are set out in the **Data Protection & Data Processing Policy** and the **Partners Agreement**.

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## 1. When This Applies

This summary applies **only** if you:

- Register as a **Partner or investor**
- Make a **capital contribution**
- Receive **returns, distributions, or exit proceeds**
- Participate in the **SIARDICO Joint Venture**

It does **not** apply to general website use, browsing, cookies, or marketing. Those are covered separately by the **Privacy Policy on [siardico.com](https://siardico.com)**.

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## 2. Who Uses Your Data

Your data is processed within the SIARDICO joint venture structure:

- **SIARDICO UK Limited** – investment, governance, and reporting
- **SIARDICO Limited (Sierra Leone)** – operational delivery

Data is used only to run and manage the investment structure set out in the **SIARDICO Framework and Partners Agreement**.

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### 3. What Information We Collect

We collect **only what is necessary** to manage your investment, including:

#### Your details

- Name and contact information
- Address and, where required, date of birth
- Company details or role (if investing via an entity)

#### Investment details

- Capital contribution amounts and payment schedule
- Records of tranches, additional funding, or dilution (if applicable)
- Ownership or participation records

#### Payments & returns

- Bank or payment details
- Records of returns, profit distributions, reinvestments, and exit proceeds

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### 4. Why We Use Your Data

We use your data to:

- Register you as a Partner or investor
- Track capital contributions and funding commitments
- Calculate and pay **returns, preferred returns, and profit distributions**
- Provide financial reports and transparency
- Meet **legal, tax, and accounting obligations**
- Protect the Joint Venture against fraud or misuse

We **do not sell your data** and do not use it for unrelated marketing.

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### 5. Who We Share It With

Your data may be shared **only when necessary** with:

- Banks and payment providers
- Accountants, auditors, and professional advisers
- Legal and regulatory advisers
- Secure IT and financial systems providers

All third parties are required to keep your information confidential and secure.

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## 6. International Transfers

Because SIARDICO operates in both the **UK and Sierra Leone**, your data may be transferred internationally.

When this happens, we use **legal safeguards** approved under UK data protection law.

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## 7. How Long We Keep Your Data

We keep your data:

- For the duration of your involvement in the investment
- For as long as required by **law, tax, and audit rules**
- For dispute resolution and regulatory compliance

When no longer needed, data is securely deleted or anonymised.

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## 8. Your Rights

You have the right to:

- See the data we hold about you
- Ask us to correct inaccurate information
- Request deletion where legally allowed
- Object to or restrict certain processing
- Withdraw consent where consent is used

You can exercise your rights by contacting SIARDICO directly.

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## 9. Key Documents to Read

This summary should be read together with:

- **Data Protection & Data Processing Policy**
- **Partners Agreement & Investment Documents**
- **Privacy Policy** (for general website use)

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## 10. Questions?

If you have questions about how your data is used as an investor or Partner:

 **admin@siardico.com**

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