

# Everymind Limited — Privacy Notice

Everymind Limited

April 2026

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## About us and the purpose of this notice

Everymind Limited (“**Everymind**”, “we”, “us”, “our” and “ours”) is a consultancy that provides professional, financial and advisory services to private equity partnerships and their portfolio businesses. We are registered in England and Wales as a company under number 04707152 and our registered office is at 2-4 Packhorse Road, Gerrards Cross, Buckinghamshire SL9 7QE.

Everymind is regulated by the Institute of Chartered Accountants in England and Wales (“**ICAEW**”) and is supervised by ICAEW for the purposes of the Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017 (as amended) (the “**AML Regulations**”). References in this notice to our “AML obligations” mean our obligations under the AML Regulations and under related financial crime legislation (including the Proceeds of Crime Act 2002, the Terrorism Act 2000, the Sanctions and Anti-Money Laundering Act 2018, the Economic Crime (Transparency and Enforcement) Act 2022 and the Economic Crime and Corporate Transparency Act 2023).

This notice tells you how we look after your personal data, about your privacy rights, and about our compliance with and your protections under UK data-protection law.

In this notice “**Data Protection Legislation**” means the UK GDPR (as defined in section 3(10) of the Data Protection Act 2018) read together with the Data Protection Act 2018, the Privacy and Electronic Communications (EC Directive) Regulations 2003 (“**PECR**”), and any other laws and regulations in the UK applicable to the processing of personal data.

For the purposes of the Data Protection Legislation and this notice, **we are the “data controller”**. This means we are responsible for deciding how we hold and use personal data about you, and we are required by the Data Protection Legislation to notify you of the information contained in this notice.

We have appointed a **Data Protection Point of Contact** who is responsible for assisting with enquiries about this notice or our treatment of personal data. Contact details are in the Contact Us section at the end of this notice.

## Categories of personal data we process

We process different categories of personal data depending on who you are and the context in which we interact with you. The categories are described below.

### Business contacts

If you have interacted with Everymind, whether through email, a meeting or otherwise, we may keep limited amounts of your personal information. This might include your name, job title, employer organisation, employment history and contact details. We do this for the purposes of providing business updates, maintaining a list of contacts, and asking you along to events or organising meetings with Everymind's representatives.

### Private equity clients

The information we hold about you may include your personal details (such as your name, telephone number and email address), our correspondence and communications with you, and details of any services you have received from us.

In addition, where required by our AML obligations, Everymind obtains and retains personal information (such as passports and other key identifying documentation, details of your beneficial ownership and control position, and source of funds/wealth information) so as to perform customer due diligence and ongoing monitoring.

We obtain your personal data directly from you when you request a proposal from us, when you engage us to provide our services, and during the provision of those services. We may also obtain personal data from credible third-party sources including electronic identification and screening providers, professional advisers and public registers (such as Companies House, the Register of Overseas Entities, and sanctions and politically-exposed-person lists).

### Actual or potential management teams of private equity portfolio businesses

If you are involved in a transaction that our private equity clients and/or the funds they advise enter into or evaluate, and we act on their behalf, we may keep certain limited amounts of your personal information. This might include your name and contact details, financial status and remuneration, your CV, your previous employment history and professional activities, your nationality, references provided by third parties, and results of other due diligence that we or our private equity clients may have conducted. We collect and store this information for the purposes of supporting and advising our private equity clients in evaluating potential transactions and in assessing your experience and suitability for proposed roles.

Where our AML obligations apply to the relevant transaction, we additionally process the categories of personal data described under "Private equity clients" above.

### Corporate clients (including portfolio companies of private equity funds)

The information we hold about you may include your personal details (such as your name, telephone number and email address), our correspondence and communications with you, and details of any services you have received from us. Where we are providing coaching services to senior management we may also store your CV, nationality, previous employment history and professional activities, references provided by third parties, and results of other due diligence and personal assessments.

In addition, where required by our AML obligations, Everymind obtains and retains personal information (such as passports and other key identifying documentation, details of your beneficial ownership and control position, and source of funds/wealth information) so as to perform customer due diligence and ongoing monitoring.

### Corporate suppliers, contractors and other professional service providers

We store limited amounts of personal information relating to corporate suppliers of Everymind, and to individual contractors engaged in providing services to us or our private equity clients. This may include names, job titles, qualifications, employer organisations, employment history, contact and bank account details.

In providing our services to our private equity clients we may also receive from our clients personal information of other professional advisers providing services to the same clients. This may include name, job title and contact details, and will be stored for the purposes of managing and preserving records of services to our clients.

### Legal bases for processing

We rely on the following legal bases under Article 6 of the UK GDPR:

- **Legitimate interests.** Where our processing is necessary for our legitimate interests in running and promoting our business, providing services to our clients and supporting our clients' decision-making, and those interests are not overridden by the data subject's own interests, rights or freedoms. This is our primary legal basis for processing relating to business contacts, client correspondence, management team due diligence, and marketing and business development activity.
- **Legal obligation.** Where our processing is necessary for us to comply with a legal obligation to which we are subject. This includes, in particular, processing required by our AML obligations (customer due diligence, sanctions screening, politically-exposed-person screening, ongoing monitoring, suspicious activity reporting, and record retention), and processing required to comply with requests from our AML supervisor (ICAEW), HM Revenue & Customs, the National Crime Agency, the Office of Financial Sanctions Implementation, and other competent authorities.
- **Performance of a contract.** Where our processing is necessary for the performance of a contract to which the data subject is party, or to take steps at the data subject's request prior to entering into such a contract.
- **Consent.** Where we cannot rely on another legal basis, we will, if necessary, obtain consent. Consent can be withdrawn at any time by contacting our Data Protection

Point of Contact, without affecting the lawfulness of processing based on consent before its withdrawal.

## Personal data processed for AML purposes

Because Everymind is an obliged entity under the AML Regulations, we are required to process certain personal data for the purpose of preventing money laundering, terrorist financing and sanctions evasion. This processing is:

- carried out on the legal basis of **legal obligation** (UK GDPR Article 6(1)(c)) and, in the case of special category data (such as political exposure information), on the basis of **substantial public interest** (UK GDPR Article 9(2)(g) and paragraph 12 of Schedule 1 to the Data Protection Act 2018);
- limited to the categories of information required for us to meet our AML obligations, including identification and verification documentation, beneficial ownership and control information, source of funds and source of wealth information, and the output of sanctions and politically-exposed-person screening;
- only used for the purposes of preventing money laundering or terrorist financing, save where another use is permitted by or under an enactment other than the AML Regulations, or with the data subject's consent; and
- subject to the **crime-prevention exemption** in paragraph 2 of Part 1 of Schedule 2 to the Data Protection Act 2018, which may restrict your data-subject rights (including your right of access) where the exercise of those rights would prejudice the prevention or detection of crime, or the apprehension or prosecution of offenders.

## Data sharing

We will share your personal data with third parties where we are required by law, where it is necessary to administer the relationship between us, or where we have another legitimate interest in doing so. This includes sharing personal data with regulators, our AML supervisor (ICAEW), the National Crime Agency, HM Revenue & Customs, the Office of Financial Sanctions Implementation, law enforcement, courts and tribunals, and any other competent authority, to the extent required or permitted by law.

“Third parties” also includes third-party service providers. The following activities are carried out by third-party service providers: IT and cloud services, electronic identification and sanctions/PEP screening services, professional advisory services and banking services. We only permit our third-party service providers to process personal data for specified purposes and in accordance with our instructions.

## Transferring personal data outside the United Kingdom

We will not transfer personal data we collect about you outside the United Kingdom save:

- where required by our AML obligations or other legal obligation; or
- where the transfer is to a third-party service provider and is undertaken in compliance with Chapter V of the UK GDPR (including on the basis of an adequacy decision, or

appropriate safeguards such as the UK International Data Transfer Agreement or the International Data Transfer Addendum to the EU Standard Contractual Clauses).

## Data security

We have in place commercially reasonable and appropriate administrative, physical and technical security measures to prevent personal data from being accidentally lost, or used, accessed, altered or disclosed in an unauthorised way. We limit access to personal data to those employees, agents, contractors and third parties who have a business need to know; they will only process personal data on our instructions and are subject to a duty of confidentiality.

We have in place procedures to deal with any suspected data-security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

## Retention of personal data

We will only retain your personal data for as long as is necessary to fulfil the purposes for which it is collected, taking into account the requirements of our business and the services we provide, our statutory and regulatory obligations, and the purposes for which we originally collected the personal data.

In particular:

- **AML records.** Personal data obtained and processed for the purposes of our AML obligations is retained for a minimum of **five years from the end of the relevant business relationship or the date of the occasional transaction**, extendable where required by law or by our AML supervisor.
- **Client records.** Personal data relating to our services is retained for the periods required by relevant tax and other law, and in any event not less than six years from the end of the relevant engagement or accounting period.
- **Business contacts and marketing.** Personal data processed for business-development purposes is retained for as long as the business relationship is live and for a reasonable period thereafter.

Where we need to use your personal data for a reason other than the purpose for which we originally collected it, we will only do so where that reason is compatible with the original purpose. If we need to use your data for a new purpose we will notify you and communicate our legal basis for that new processing.

## Your rights

### Your duty to inform us of changes

It is important that the personal data we hold about you is accurate and current. Should your personal information change, please notify us using the contact details below.

## Your rights in connection with personal data

Under the Data Protection Legislation, you have the following rights (in each case subject to the exceptions and qualifications set out in that legislation):

- Request **access** to your personal data, so that you can receive details of the personal data we hold about you and check that we are processing it lawfully.
- Request **correction** of personal data that we hold about you.
- Request **erasure** of your personal data, where there is no good reason for us continuing to process it, or where you have exercised your right to object to processing.
- **Object** to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and something about your particular situation makes you want to object; you also have the right to object where we are processing personal data for direct marketing purposes.
- Request the **restriction** of processing of your personal data, so that we suspend processing (for example while you want us to establish the accuracy of the data or the reason for processing it).
- Request the **transfer** of your personal data to you or another data controller, where the processing is based on consent or on the performance of a contract and is carried out by automated means and this is technically feasible.

**AML-related limitation on your rights.** Where you ask us to exercise any of the above rights in respect of personal data that we process for the purposes of our AML obligations, we may be obliged under paragraph 2 of Part 1 of Schedule 2 to the Data Protection Act 2018, and under our AML obligations (including the tipping-off provisions of section 333A of the Proceeds of Crime Act 2002), to restrict or delay your right, or to refuse your request, where complying with the request would prejudice the prevention or detection of crime, or the apprehension or prosecution of offenders, or where we are prohibited by law from disclosing the existence of a report to the National Crime Agency. We will explain the position to you to the extent we are permitted by law to do so.

If you want to exercise any of the above rights, please contact our Data Protection Point of Contact using the contact details below.

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). We may charge a reasonable fee for the administrative costs of complying with the request if it is manifestly unfounded or excessive, or refuse to comply in those circumstances. We may also need to request specific information from you to confirm your identity and ensure your right to access the information.

## Right to withdraw consent

In the limited circumstances where you have provided consent to the collection, processing and transfer of your personal data for a specific purpose (for example, in relation to direct marketing that you have indicated you would like to receive from us), you have the right to withdraw your consent at any time by contacting our Data Protection Point of Contact.

Once we have received notification of withdrawal, we will no longer process your personal data for the purpose or purposes you originally agreed to unless we have another legal basis for doing so.

### Changes to this notice

Any changes we make to this privacy notice will be posted on our website at [everymind.co.uk](http://everymind.co.uk) and, where appropriate, communicated to clients by other means.

This privacy notice was last updated in **April 2026**.

### Contact us

If you have any questions about this notice or would like to speak to us about how we process your personal data, please email our Data Protection Point of Contact at [david.packford@everymind.co.uk](mailto:david.packford@everymind.co.uk), or telephone David Packford on 07515 899113.

You also have the right to make a complaint to the **Information Commissioner's Office** (ICO), the UK supervisory authority for data-protection issues, at any time. The ICO's contact details are:

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

Telephone: 0303 123 1113 or 01625 545 745 Website: [ico.org.uk](http://ico.org.uk)

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*Everymind Limited, April 2026. This privacy notice supersedes the privacy notice dated 21 April 2021.*