

## Statement of Policy

SCB Partners [HKX building, 3 Pancras Square, London, N1c 4AG] is fully committed to compliance with the requirements of the European General Data Protection Regulation and the Data Protection Act 2018 (the Data Protection Laws). The company will therefore follow procedures which aim to ensure that all employees, contractors, consultants, partners or agents of the company (collectively known as data users) who have access to any personal data held by or on behalf of the company are fully aware of and abide by their duties under the Data Protection Laws.

### **What information do we collect and how do we collect it?**

The company needs to collect and use information about people in order to operate and carry out its functions and to provide its clients and other users with best in class services. The data we collect and use may relate to members of the public, current, past and prospective employees, clients and customers and suppliers.

The types of personal information we collect may include:

- name, surname, age, company, image, birth date, email address, phone number, billing address and shipping address;
- customer type, job function, job title, purchasing authority, purchasing timeframe and others;
- product and service preferences, contact preferences, marketing preferences, educational and employment background, and job interest data;
- financial and credit card information (where applicable);
- responses to any customer satisfaction surveys or market research (unless these are provided anonymously); and
- IP addresses and other online identifiers.

We may also collect information about you from third party sources, such as from your use of other websites which we operate and from related third parties such as sub-contractors.

### **How do we use your information?**

We gather and use information in a number of ways, including the following:

**Browsing and Searching:** We collect certain personal information when you visit our website or click on the various links for products and services. We collect this information to improve your web user experience for your next visits, to help run the site more efficiently, to gather broad demographic information, to monitor the level of activity on the website, and to evaluate the effectiveness of our advertising. See also the [Cookies Policy](#) for our and our group's use of cookies.

**Technical support:** We may collect certain information when you request technical support for our products and services. This information is necessary to identify your systems, understand the configuration of the equipment, diagnose your questions, and provide solutions.

**Online surveys and polling:** We collect personal information from our clients who volunteer to complete surveys or participate in polls. We use this information to improve our offers and services.

**Newsletters and promotional e-mails:** We collect personal information when you ask to receive newsletters, promotional e-mails, and other information. We use this information to provide you the information you request.

**Marketing:** We (including our group companies) and carefully selected third parties may use the information we collect to inform you, by letter, fax, phone, SMS and email about promotions, news and new products that we think may be of interest to you. When providing us with your personal information you will be given the choice to be contacted by these methods for these purposes. You have the right to object at any time to this kind of processing.

**Market research:** We collect and process personal information as part of our market research services provided to our clients, including, surveys (on-line, face to face, or telephone), focus group discussions, and other market research related activities.

**Contact information:** If you contact us (including via social networking websites, third party apps or similar technologies), we keep a record of your correspondence or comments, including personal information, in a file specific to you. We use this information to help us provide you better service in the event you contact us again.

**Security and compliance:** We also use personal information for security and fraud prevention, to ensure that our website and digital properties are safe and secure, and to comply with applicable laws and regulations.

### **Legal basis for processing your personal information**

We will only process your personal information where we have a legal basis to do so. The legal basis will depend on the purposes for which we have collected and use your personal information. In almost every case the legal basis will be one of the following:

**Consent:** For example, where you have provided your consent to receive certain marketing from us. You can withdraw your consent at any time, including by clicking on the “unsubscribe” link at the bottom of any marketing email we send you.

**Our legitimate business interests:** Where it is necessary for us to understand our customers, promote our services and operate effectively as a brand strategy consultancy, provided in each case that this is done in a legitimate way which does not unduly affect your privacy and other rights. For example we will rely on this legal basis when we conduct certain market analysis to understand our customers in sufficient detail so we can create new services and improve the profile of our brand.

**Performance of a contract with you (or in order to take steps prior to entering into a contract with you):** For example, where you have ordered a service from us and we need to use your contact details and payment information in order to process your order.

**Compliance with law:** Where we are subject to a legal obligation and need to use your personal information in order to comply with that obligation.

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

We may share your personal information:

- Within our group of companies (i.e. our subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 1159 of the UK Companies Act 2006) and with our suppliers, business partners and service providers, where they are helping us to market and advertise our services as well as providing our services to you.
- To the prospective buyer of any of our business or assets, in the event that we sell any of such business or assets.
- With other third parties such as legal or other advisors, regulatory authorities, courts, law enforcement agencies and government agencies where necessary to enable us to enforce our legal rights, or to protect the rights, property or safety of our employees or where such disclosure may be permitted or required by law.

## **How do we keep and use your personal information?**

We consider that the correct treatment of personal data is integral to our successful operations and to maintaining trust of the persons we deal with. We fully appreciate the underlying principles of the Data Protection Laws and support and adhere to their provisions.

SCB Partners will, through management and use of appropriate controls, monitoring and review:

- Use personal data in the most efficient and effective way to deliver our services.
- Collect and process personal data which is not excessive for the purposes for which it is needed.
- Use personal data for such purposes as are described at the point of collection, or for purposes which are legally permitted.
- Ensure personal information is accurate and, where necessary, kept up-to-date.
- Not keep information for longer than is necessary.
- Securely destroy data which is no longer needed.
- Take appropriate technical and organisational security measures to safeguard information (including unauthorised or unlawful processing and accidental loss or damage of data).
- Ensure that information is not transferred abroad without suitable safeguards (including approved data transfer mechanisms such as the EU “Standard Contractual Clauses” and the EU-US “Privacy Shield”). If you are located in the United Kingdom or European Economic Area, you may contact us for a copy of the safeguards which we have put in place to protect your personal information and privacy rights in these circumstances.
- Ensure that personal information is collected and used in accordance with individuals’ data protection rights.
- Ensure that the rights of people about whom information is held can be exercised under the Data Protection Laws. These rights include:
  - the right to be informed of the ways in which we use their information, as we seek to do in this policy;
  - the right to access their own personal information and receive a copy of that information, in certain circumstances;
  - the right to limit or prevent processing in certain circumstances (including for marketing purposes);
  - the right to correct, rectify, block or erase information regarded as out of date or incorrect;

- the right to complain to a data protection authority if they think we have processed their personal information in a manner which is unlawful or breaches their rights. (If you have such concerns, we request that you initially contact us (using the contact details above) so that we can investigate, and hopefully resolve, your concerns.)
- Provide guidance and training for data users at an appropriate level.
- Ensure that any breaches of this policy are dealt with appropriately.

### **Updates to this policy**

We reserve the right to modify this policy as needed, for example, to comply with changes in laws, regulations, our practices and procedures, or requirements imposed by data protection authorities. In this case, we will inform you of any material changes in this policy. We will post all changes on relevant internal and external websites.

Last update: 31<sup>st</sup> January 2019