

# PRIVACY POLICY

## INTRODUCTION

Welcome to the privacy policy (the “**Privacy Policy**”) of Succession Corporate Finance Ltd (“**We**”, “**Us**” or “**Our**”) of C/O Mackrell, 60 St. Martin's Lane, Covent Garden, London, WC2N 4JS.

We respect your privacy and are committed to protecting your personal data. This Privacy Policy will inform you as to how We look after your personal data when you visit Our website at <http://successcf.com>. (the “**Site**”), regardless of where you visit it from, and tell you about your privacy rights and how the law protects you.

Please also use the **Glossary** to understand the meaning of some of the terms used in this Privacy Policy.

1. Important information and who we are
2. The data we collect about you
3. How is your personal data collected
4. How we use your personal data
5. Disclosures of your personal data
6. Data security
7. Data retention
8. Your legal rights
9. Glossary

## 1 IMPORTANT INFORMATION AND WHO WE ARE

### 1.1 Purpose of this privacy policy

(a) This Privacy Policy aims to give you information on how We collect and process your personal data through your use of the Site.

(b) This Site is not intended for children and We do not knowingly collect data relating to children.

(c) It is important that you read this Privacy Policy together with any other privacy notice or fair processing notice We may provide on specific

occasions when We are collecting or processing personal data about you so that you are fully aware of how and why We are using your data. This Privacy Policy supplements the other notices and is not intended to override them.

1.2 You have the right to make a complaint at any time to the Information Commissioner's Office, the UK supervisory authority for data protection issues (*ico.org.uk*) or to any equivalent body in the relevant jurisdiction (collectively, the "ICO"). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please *contact Us* in the first instance.

1.3 Changes to the privacy notice and your duty to inform us of changes

(a) It is important that the personal data We hold about you is accurate and current. Please keep Us informed if your personal data changes during your relationship with Us.

1.4 Third-party links

The Site may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave the Site, We encourage you to read the privacy policy of every website you visit.

## **2 THE DATA WE COLLECT ABOUT YOU**

2.1 Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

2.2 We may collect, use, store and transfer different kinds of personal data about you which We have grouped together as follows:

- a. **“Identity Data”** includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth, photographs, job title, national insurance number, age and gender;
- b. **“Contact Data”** includes billing address, residential address, delivery address, email address, work address, social media handles, telephone numbers and fax number;
- c. **“Financial Data”** includes bank account details;
- d. **“Transaction Data”** includes details about payments to and from you and other details of products and services you have purchased from us;
- e. **“Technical Data”** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, full ‘Uniform Resource Locators’ clickstream to, through and from the Site (including date and time) and other technology on the devices you use to access the Site;
- f. **“Profile Data”** includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses, products you viewed or searched for; page response times; download errors; length of visits to certain pages; page interaction information (such as scrolling, clicks, mouse-overs and methods used to browse away from the page);
- g. **“Usage Data”** includes information about how you use the Site, products and services; and
- h. **“Marketing and Communications Data”** includes your preferences in receiving marketing from us and Our third parties and your communication preferences.

Where We need to collect personal data by law, or under the terms of a contract We have with you and you fail to provide that data when requested, We may not be able to perform the contract We have or are trying to enter into with you (for example, to provide you with goods or services). In this case, We may have to cancel a product or service you have with Us but We will notify you if this is the case at the time.

### **3 HOW IS YOUR PERSONAL DATA COLLECTED?**

3.1 We use different methods to collect data from and about you including through:

(a) **Direct interactions.** You may give Us your Identity Data, Contact Data and Financial Data by filling in forms or by corresponding with Us by post, phone, email or otherwise. This includes personal data you provide when you:

- i. apply for Our products or services;
- ii. register for any of Our events;
- iii. subscribe to Our service or publications;
- iv. request marketing to be sent to you;
- v. enter a competition, promotion or survey; or
- vi. give us some feedback.

(b) **Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources such as analytics providers, search information providers, advertising networks, technical, payment and delivery services, data brokers or aggregators and publicly available sources such as Companies House and the Electoral Register based inside the EU. Please **Contact Us** to find out more about the various third parties and public sources from which We may receive personal data about you.

### **4 HOW WE USE YOUR PERSONAL DATA**

4.1 We will only use your personal data when the law allows us to. Most commonly, We will use your personal data in the following circumstances:

- a. Where We need to perform the contract We are about to enter into or have entered into with you.
- b. Where it is necessary for Our Legitimate Interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- c. Where We need to Comply with a Legal or Regulatory Obligation.

4.2 Generally, We do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by **Contacting Us**.

### 4.3 Purposes for which we will use your personal data

(a) We have set out below, in a table format, a description of all the ways We plan to use your personal data, and which of the legal bases We rely on to do so. We have also identified what Our Legitimate Interests are where appropriate.

(b) Note that We may process your personal data for more than one lawful ground depending on the specific purpose for which We are using your data. Please **Contact Us** if you need details about the specific legal ground We are relying on to process your personal data where more than one ground has been set out in the table below.

<b>Purpose/Activity</b>	<b>Type of data</b>
To register you as a new customer	(a) Identity Data (b) Contact Data
To process and deliver your order including: (a) Manage payments, fees and charges  (b) Collect and recover money owed to Us	(a) Identity Data (b) Contact Data  (c) Financial Data (d) Transaction Data  (e) Marketing and Communications Data
To manage Our relationship with you which will include: (a) Notifying you about changes to Our terms or Privacy Policy	(a) Identity Data (b) Contact Data

<p>(b) Asking you to leave a review or take a survey</p>	<p>(c) Profile Data</p> <p>(d) Marketing and Communications Data</p>
<p>To enable you to partake in a prize draw, competition or complete a survey</p>	<p>(a) Identity Data</p> <p>(b) Contact Data</p> <p>(c) Profile Data</p> <p>(d) Usage Data</p> <p>(e) Marketing and Communications Data</p>
<p>To administer and protect Our business and the Site (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</p>	<p>(a) Identity Data</p> <p>(b) Contact Data</p> <p>(c) Technical Data</p>
<p>To deliver relevant Site content and advertisements to you and measure or understand the effectiveness of the advertising We serve to you</p>	<p>(a) Identity Data</p> <p>(b) Contact Data</p> <p>(c) Profile Data</p> <p>(d) Usage Data</p> <p>(e) Marketing and Communications Data</p> <p>(f) Technical Data</p>
<p>To use data analytics to improve the Site and Our products/services, marketing, customer relationships and experiences</p>	<p>(a) Technical Data</p> <p>(b) Usage Data</p>
<p>To make suggestions and recommendations to you about goods or services that may be of interest to you</p>	<p>(a) Identity Data</p> <p>(b) Contact Data</p> <p>(c) Technical Data</p>

(d) Usage Data

(e) Profile Data

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#### 4.4 Automated decision making

We do not use your personal data to make automated decisions.

#### 4.5 Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

#### 4.6 Opting out

(a) You can ask us or third parties to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by *Contacting Us* at any time.

(b) Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product/service purchase, product/service experience or other transactions.

#### 4.7 Change of purpose

(a) We will only use your personal data for the purposes for which We collected it, unless We reasonably consider that We need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please *Contact Us*.

(b) If We need to use your personal data for an unrelated purpose, We will notify you and We will explain the legal basis which allows Us to do so.

(c) Please note that We may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## **5 DISCLOSURES OF YOUR PERSONAL DATA**

5.1 We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4.3 above.

- a. External Third Parties as set out in **paragraph 9.2(b)** below.
- b. Specific third parties listed in the table in paragraph 4.3 above.
- c. Third parties to whom We may choose to sell, transfer, or merge parts of Our business or Our assets. Alternatively, We may seek to acquire other businesses or merge with them. If a change happens to Our business, then the new owners may use your personal data in the same way as set out in this Privacy Policy.

5.2 We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow Our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with Our instructions.

## **6 DATA SECURITY**

6.1 We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, We limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on Our instructions and they are subject to a duty of confidentiality.

## **7 DATA RETENTION**

7.1 How long will you use my personal data for?

7.2 We will only retain your personal data for as long as necessary to fulfil the purposes We collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

7.3 To determine the appropriate retention period for personal data, We consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which We process your personal data and whether We can achieve those purposes through other means, and the applicable legal requirements.

7.4 Details of retention periods for different aspects of your personal data are set out in the table in paragraph 4.3 above.

7.5 By law We have to keep basic information about Our customers (including Contact Data, Identity Data, Financial Data and Transaction Data) for seven years after they cease being customers for tax purposes.

7.6 In some circumstances you can ask Us to delete your data: see Request erasure below for further information.

7.7 In some circumstances We may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case We may use this information indefinitely without further notice to you.

## **8 YOUR LEGAL RIGHTS**

8.1 Under certain circumstances, you have rights under data protection laws in relation to your personal data. These include:

- a. Request access to your personal data.
- b. Request correction of your personal data.
- c. Request erasure of your personal data.
- d. Object to processing of your personal data.
- e. Request restriction of processing your personal data.
- f. Request transfer of your personal data.
- g. Right to withdraw consent.

8.2 If you wish to exercise any of the rights set out in paragraph 8.1 above, please *Contact Us*.

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, We may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, We may refuse to comply with your request in these circumstances.

### 8.3 What we may need from you

We may need to request specific information from you to help Us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up Our response.

### 8.4 Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, We will notify you and keep you updated.

## 9 GLOSSARY

### 9.1 Lawful basis

- a. **“Legitimate Interest”** means the interest of Our business in conducting and managing Our business to enable Us to give you the best service/product and the best and most secure experience. We make sure We consider and balance any potential impact on you (both positive and negative) and your rights before We process your personal data for Our Legitimate Interests. We do not use your personal data for activities where Our interests are overridden by the impact on you (unless We have your consent or are otherwise required or permitted to by law). You can obtain further information about how We assess Our Legitimate Interests against any potential impact on you in respect of specific activities by *Contacting Us*

- b. **“Performance of a Contract”** means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.
- c. **“Comply with a Legal or Regulatory Obligation”** means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that We are subject to.

## 9.2 Third parties

### EXTERNAL THIRD PARTIES:

- i. Service providers acting as processors who provide IT, system administration, CRM, collaboration, marketing automation, market research, public relations and email communication services.
- ii. Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services.
- iii. HM Revenue & Customs, regulators and other authorities in the relevant jurisdictions acting as processors or joint controllers who require reporting of processing activities in certain circumstances.

## 9.3 YOUR LEGAL RIGHTS

You have the right to:

- a. **Request access** to your personal data (commonly known as a **“data subject access request”**). This enables you to receive a copy of the personal data We hold about you and to check that We are lawfully processing it.
- b. **Request correction** of the personal data that We hold about you. This enables you to have any incomplete or inaccurate data We hold about you corrected, though We may need to verify the accuracy of the new data you provide to Us.
- c. **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for Us continuing to process it. You also have the right to ask Us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where We may have processed

your information unlawfully or where We are required to erase your personal data to comply with local law. Note, however, that We may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

- d. **Object to processing** of your personal data where We are relying on a Legitimate Interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where We are processing your personal data for direct marketing purposes. In some cases, We may demonstrate that We have compelling legitimate grounds to process your information which override your rights and freedoms.
- e. **Request restriction of processing** of your personal data. This enables you to ask Us to suspend the processing of your personal data in the following scenarios: (a) if you want Us to establish the data's accuracy; (b) where Our use of the data is unlawful but you do not want Us to erase it; (c) where you need Us to hold the data even if We no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to Our use of your data but We need to verify whether We have overriding legitimate grounds to use it.
- f. **Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for Us to use or where We used the information to perform a contract with you.
- g. **Withdraw consent at any time** where We are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, We may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.