

PRIVACY AND COOKIES POLICY

16 May 2018

Pakenham Partners Limited (company number: 7516620), One Knightsbridge Green, London, SW1X 7QA, United Kingdom (**us** or **we**) is committed to ensuring that your privacy is protected, and all data collected by us will be processed in accordance with this privacy and cookies policy. Please read this policy carefully to ensure you understand our views and practices regarding your personal data and how we will treat it.

For the purposes of the General Data Protection Regulation (Regulation (EU) 2016/769) (**GDPR**), the data controllers are Kevin Pakenham and Krzysztof Owerkowicz, of Pakenham Partners Limited. We can be contacted at kpakenham@pakenhampartners.com, tel +44 (0) 207 0450801; and kowerkowicz@pakenhampartners.com, tel. +44 (0) 207 045 0802.

By visiting our Site or by providing us with information you are accepting the practices described in this Privacy and Cookies Policy.

1 WHAT INFORMATION WE PROCESS

1.1 We may collect and process the following information from you:

1.1.1 information about you, including your name and email address, that you give us emailing us; and

1.1.2 information we may automatically collect such as technical information including the internet protocol (**IP**) address used to connect to the internet, information about your visit including the full Uniform Resource Locators (**URL**) clickstream and your search history on our Website.

2 HOW DO WE USE YOUR PERSONAL DATA?

2.1 When you provide us with your information we will use it for the purpose of administering your query and responding to you. We therefore have legitimate interests in processing your personal data in this way, since if we do not process your data we will be unable to do this.

2.2 Unless you provide your consent, we will not further process your name and email address to send you marketing information that you have not requested. Withdrawing your consent does not affect the lawfulness of any processing which occurred prior to the withdrawal of consent.

2.3 We may also use your personal information:

2.3.1 to help us provide you with the best possible service;

2.3.2 to notify you about changes to the services we offer.

3 DISCLOSURE OF INFORMATION

- 3.1 We will only supply your personal information to a third party:
- 3.1.1 where we need to share the information to provide a product or a service requested by you;
 - 3.1.2 if we or substantially all of our assets are acquired by a third party, in which case personal data held by us about our customers will be one of the transferred assets; or
 - 3.1.3 if we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms of use and other agreements, or to protect the rights, property or safety of our company, our customers or others, including exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

4 WHERE WE STORE YOUR INFORMATION

- 4.1 The data that we collect from you may be transferred to and stored at a destination outside the European Economic Area (**EEA**). It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers for the purposes set out above only. In order to ensure that any third party treats your personal data in a way which is consistent with the UK and EU's laws on data protection, we have put in place agreements with those third parties which contain provisions approved by the EU for protecting personal data.
- 4.2 We will retain your information for six (6) years, after which time it will be destroyed, unless we have a legitimate need or obligation to retain it for longer.

5 IP ADDRESSES AND COOKIES

- 5.1 We may obtain information about your computer and general internet usage, including your IP address, operating system and browser type, for security purposes. We do not use cookies for tracking or analytical purposes, solely for security purposes.
- 5.2 Most web browsers automatically accept cookies, but you can modify your browser setting to decline cookies if you prefer.
- 5.3 A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server.
- 5.4 Cookies can be used by web servers to identify and track users as they navigate different pages on a website and identify users returning to a website.

6 LINKS TO OTHER WEBSITES

- 6.1 This policy extends only to our Website and does not cover your use of, provision of data to and collection of your data on any other website.
- 6.2 Our Website may from time to time contain links to and from other websites. If you follow a link to any of these websites please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. You should always check these policies before you submit any personal data to any third party website.

7 YOUR RIGHTS IN RESPECT OF YOUR INFORMATION

The GDPR gives you a number of rights in respect of your data, including:

7.1 *Right to access*

- 7.1.1 You have the right to access the information we hold about you. If you would like a copy of this information please contact us. We may request proof of your identity before sharing such information.

7.2 *Right to rectify your personal data*

- 7.2.1 If you discover that the information we hold about you is incorrect or out of date, you may ask us to correct that information.

7.3 *Right to be forgotten*

- 7.3.1 You may ask us to delete information we hold about you in certain circumstances. It may not be possible for us to delete all of the information we hold about you where we have an ongoing relationship, however please contact us and we will do our best to assist with your request.

7.4 *Other rights*

- 7.4.1 In addition to the above, you may also ask us to stop or restrict processing of the information we have about you. You may also ask us to transfer your personal information to a third party in certain circumstances. If you would like any other information on this aspect of your rights, please contact us.

8 CONTACT

- 8.1 If you have any questions, want to exercise any of your rights or make a complaint, please contact us using the details at the beginning of this policy.
- 8.2 If we are unable to resolve your complaint you may contact the Information Commissioner's Office at the Exchange Tower, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF Tele: 0303 123 1113.

9 CHANGES TO THIS PRIVACY POLICY

This policy may be reviewed and amended from time to time. As a result of improvements we make to our services, changes in the law or developments in technology, we may change the information we hold about you, the method and purposes for which we process such information. If we make any substantial change in the way in which we use your personal information we will notify you by email.

10 LAW AND JURISDICTION

Your use of the Website and the policy is subject to the laws of England and Wales and the exclusive jurisdiction of the English courts regarding any disputes that may arise under it.