

PRIVACY NOTICE

HEADLESS HORSE LTD, REGISTERED IN ENGLAND AND WALES, COMPANY NUMBER 10573016, REGISTERED OFFICE – 2 STAMFORD SQUARE, LONDON, ENGLAND, SW15 2BF ("HEADLESS HORSE") RESPECTS YOUR PRIVACY AND IS COMMITTED TO PROTECTING IT. WE PROVIDE THIS PRIVACY NOTICE TO INFORM YOU OF OUR POLICY AND PRACTICES IN RELATION TO DATA PROTECTION.

WE ARE A /DATA CONTROLLER/ IN TERMS UNDER DATA PROTECTION LAW (THE EU GENERAL DATA PROTECTION REGULATION 2016 AND THE DATA PROTECTION ACT 2018) (/DATA PROTECTION LAWS/).

THIS PRIVACY NOTICE EXPLAINS HOW WE COLLECT AND USE THE INFORMATION ABOUT OUR CLIENTS, CONTRACTORS, SUPPLIERS AND GUESTS OF OUR CLIENTS. WE NEED TO PROCESS PERSONAL DATA RELATING TO THE AFOREMENTIONED GROUPS OF INDIVIDUALS SO THAT THE SERVICES YOU REQUEST CAN BE DELIVERED EFFECTIVELY AND EFFICIENTLY, TO IMPROVE OUR SERVICES, TO ENSURE GOOD GOVERNANCE, TO PERFORM OUR BUSINESS AND TO ENABLE US TO MEET OUR LEGAL OBLIGATIONS.

INFORMATION WE MAY COLLECT AND HOW WE USE IT:

THIS LIST INCLUDES ALL THE WAYS WE MAY USE YOUR PERSONAL INFORMATION, AND WHICH OF THE REASONS WE RELY ON TO DO SO. THIS IS WHERE WE TELL YOU WHAT OUR LEGITIMATE INTERESTS ARE.

<u>PERSONAL INFORMATION WE MAY PROCESS</u>	<u>OUR REASONS FOR PROCESSING</u>	<u>OUR LEGITIMATE INTERESTS</u>
CLIENTS EMPLOYEES OF CLIENTS: NAME CONTACT DETAILS FINANCIAL DETAILS	FULFILLING CONTRACTS OUR LEGITIMATE INTERESTS	TO ADMINISTER OUR BUSINESS AND FULFIL OUR CONTRACTS TO KEEP CLIENTS UP TO DATE WITH NEWS IN RELATION TO HEADLESS HORSE WHICH MAY BE OF INTEREST, IN ACCORDANCE WITH DATA PROTECTION LAWS
CONTRACTORS: NAME CONTACT DETAILS FINANCIAL DETAILS	FULFILLING CONTRACTS OUR LEGITIMATE INTERESTS	TO ADMINISTER OUR BUSINESS AND FULFIL OUR CONTRACTS
SUPPLIERS/EMPLOYEES OF SUPPLIERS: NAME CONTACT DETAILS JOB TITLES	FULFILLING CONTRACTS OUR LEGITIMATE INTERESTS	TO KEEP IN CONTACT WITH SUPPLIERS ADMINISTERING OUR BUSINESS
GUESTS OF OUR CLIENTS: NAME CONTACT DETAILS	OUR LEGITIMATE INTERESTS	TO USE PERSONAL INFORMATION IN ORDER TO FULFIL OUR BUSINESS ACTIVITIES

WHERE DO WE OBTAIN YOUR INFORMATION?

IN MOST CASES WE WILL OBTAIN INFORMATION FROM YOU DIRECTLY.

MORE SPECIFICALLY WE COLLECT INFORMATION:

WHEN YOU EMAIL OR CALL US;

AT A MEETING; AND

WHEN A THIRD PARTY INTRODUCES US.

WE MAY MONITOR, RECORD, STORE AND USE ANY EMAIL OR OTHER COMMUNICATION WITH YOU.

SHARING YOUR INFORMATION INTERNALLY AND WITH OTHER ORGANISATIONS

THE INFORMATION YOU PROVIDE TO US MAY BE ACCESSED BY OUR STAFF, OUR AUDITORS, OUR PROFESSIONAL ADVISORS AND CAREFULLY SELECTED THIRD PARTIES IN THE COURSE OF PROVIDING SERVICES TO US UNDER SUITABLE OBLIGATIONS OF CONFIDENTIALITY. WE WILL PROVIDE INFORMATION ABOUT YOU TO THIRD PARTY ORGANISATIONS IF THE SERVICES WE PROVIDE TO YOU NEED US TO DO THIS.

SECURITY

WE EMPLOY ADMINISTRATIVE, ELECTRONIC AND PHYSICAL SECURITY MEASURES TO ENSURE THAT THE INFORMATION THAT WE COLLECT ABOUT YOU IS PROTECTED FROM ACCESS BY UNAUTHORISED PERSONS AND PROTECTED AGAINST IMPROPER USE AND DISCLOSURE, UNAUTHORISED MODIFICATION AND UNLAWFUL PROCESSING OR DESTRUCTION OR ACCIDENTAL LOSS, DESTRUCTION OR DAMAGE.

PLEASE BE AWARE THAT UNFORTUNATELY THE TRANSMISSION OF INFORMATION VIA THE INTERNET OR BY EMAIL IS NOT COMPLETELY SECURE. ALTHOUGH WE WILL DO OUR BEST TO PROTECT YOUR PERSONAL DATA, WE CANNOT GUARANTEE THE SECURITY OF THE DATA TRANSMITTED TO US AND ANY TRANSMISSION IS AT YOUR OWN RISK.

THE PERIOD FOR WHICH THE PERSONAL DATA WILL BE PROCESSED

WE WILL RETAIN PERSONAL DATA SECURELY AND ONLY IN LINE WITH HOW LONG IT IS NECESSARY TO KEEP FOR THE PURPOSES OR FOR A LEGITIMATE AND LAWFUL REASON.

OUR TYPICAL RETENTION PERIODS ARE AS FOLLOWS:

CLIENT CONTRACTS	7 YEARS FROM THE EXPIRY OR TERMINATION DATE OF THE CONTRACT
CONTRACTOR CONTRACTS	7 YEARS FROM THE EXPIRY OR TERMINATION DATE OF THE CONTRACT
SUPPLIER CONTRACTS	7 YEARS FROM THE EXPIRY OR TERMINATION DATE OF THE CONTRACT
INFORMATION RE GUESTS OF CLIENTS	1 YEAR FROM THE DATE OF THE EVENT IN WHICH THE GUEST INFORMATION WAS USED
MARKETING LIST NAMES AND	3 YEARS FROM THE LAST DATE OF CONTACT WITH PARTICULAR INDIVIDUAL

SOME PERSONAL DATA MAY BE RETAINED FOR LONGER WHERE IT IS IN OUR LEGITIMATE INTEREST TO DO SO, SUCH AS TO PROTECT AND DEFEND OUR LEGAL RIGHTS; OR FOR RESEARCH, ARCHIVING OR STATISTICAL PURPOSES. INDIVIDUALS CAN REQUEST THAT OTHER INFORMATION RELATING TO THEM BE ERASED AND WE WILL DEAL WITH SUCH REQUESTS IN ACCORDANCE WITH THE LAW.

TRANSFERS OUTSIDE THE EUROPEAN ECONOMIC AREA

WE, OR CAREFULLY SELECTED THIRD PARTIES THAT WE CONTRACT WITH, MAY SEND PERSONAL DATA TO COUNTRIES OUTSIDE THE EUROPEAN ECONOMIC AREA (EEA). IF AND WHEN THIS OCCURS, THERE WILL BE PROTECTIONS IN PLACE TO ENSURE THE RECIPIENT PROTECTS THE DATA TO THE SAME STANDARD AS THE EEA. THE PROTECTIONS INCLUDE:

TRANSFERRING TO A NON-EEA COUNTRY WITH PRIVACY LAWS THAT GIVE THE SAME PROTECTION AS THE EEA

PUTTING IN PLACE A CONTRACT WITH THE RECIPIENT THAT MEANS THEY MUST PROTECT PERSONAL DATA TO THE SAME STANDARDS AS THE EEA.

TRANSFER PERSONAL DATA TO ORGANISATIONS THAT ARE PART OF PRIVACY SHIELD. THIS IS A FRAMEWORK THAT SETS PRIVACY STANDARDS FOR PERSONAL DATA SENT BETWEEN THE US AND EU COUNTRIES WHICH MAKES SURE STANDARDS ARE SIMILAR TO WHAT IS USED WITHIN THE EEA.

YOUR RIGHTS AS A DATA SUBJECT

YOU HAVE THE RIGHT AS A DATA SUBJECT UNDER APPLICABLE DATA PROTECTION LAWS TO:

- MAKE A REQUEST TO GET A COPY OF THE PERSONAL INFORMATION THAT WE HOLD ABOUT YOU;
- YOU CAN ALSO ASK US TO CORRECT YOUR PERSONAL INFORMATION IF IT IS INCORRECT;
- REQUEST THE ERASURE OF PERSONAL DATA;
- RESTRICT HOW WE PROCESS YOUR PERSONAL DATA;
- OBJECT TO PROCESSING, AND
- DATA PORTABILITY.

WHERE WE PROCESS YOUR PERSONAL DATA BASED UPON YOUR CONSENT, YOU HAVE THE RIGHT TO WITHDRAW YOUR CONSENT AT ANY TIME.

FOR MORE INFORMATION AND GUIDANCE ABOUT ANY OF THESE RIGHTS PLEASE GO TO THE WEBSITE OF THE INFORMATION COMMISSIONER'S OFFICE AT [HTTPS://ICO.ORG.UK/](https://ico.org.uk/).

COMPLAINTS

IF YOU THINK THERE IS AN ISSUE IN THE WAY IN WHICH WE HANDLE YOUR PERSONAL DATA, YOU HAVE A RIGHT TO RAISE A COMPLAINT WITH THE INFORMATION COMMISSIONER'S OFFICE. THEIR WEBSITE CONTAINS DETAILS OF HOW TO MAKE A COMPLAINT. HOWEVER, WE ASK THAT YOU GIVE US THE OPPORTUNITY TO DEAL WITH YOUR COMPLAINT IN THE FIRST INSTANCE.

CHANGES TO THIS PRIVACY & FAIR PROCESSING NOTICE

WE KEEP OUR PRIVACY NOTICE UNDER REGULAR REVIEW AND RESERVE THE RIGHT TO UPDATE AND AMEND IT. THIS NOTICE WAS LAST UPDATED ON 10 APRIL 2019.

VISITORS TO OUR WEBSITE

YOUR PERSONAL DETAILS IS NOT RECORDED UNLESS YOU CHOOSE TO SUBMIT AN EMAIL.

UNSUBSCRIBE

YOU HAVE THE RIGHT TO REMOVE YOUR PERSONAL INFORMATION FROM OUR MAILING LISTS OR CAN CHOOSE NOT TO RECEIVE FURTHER INFORMATION ABOUT OUR LATEST WORK. TO DO THIS, PLEASE FOLLOW THE UNSUBSCRIBE OPTION ATTACHED TO ALL OF OUR MARKETING EMAILS.

ASK TO SEE YOUR RECORDS

SEE INFORMATION WE HOLD ABOUT YOU

UNDER THE DATA PROTECTION LAWS YOU HAVE A RIGHT TO ASK TO SEE INFORMATION HELD BY US THAT IS ABOUT YOU. ASKING FOR THIS INFORMATION IS CALLED MAKING A SUBJECT ACCESS REQUEST OR SAR..

FURTHER INFORMATION

FOR FURTHER INFORMATION ABOUT THE PROPOSED DATA SHARING SET OUT IN THIS NOTICE, OR ABOUT ANY ASPECT OF THE WAY HEADLESS HORSE IS PROCESSING YOUR PERSONAL DATA, PLEASE CONTACT US AT HELLO@HEADLESS.HORSE