

Privacy Notice

We, Patron Hallow Limited, are committed to protecting your privacy. There are various ways that you might interact with Patron Hallow, and the information you provide when doing so allows us to improve our services.

Our privacy policy explains:

- What information we collect, and why we collect it
- How we use that information
- How we protect that information
- Your rights
- How we share information collected

This Privacy Policy applies to Patron Hallow Limited and covers our processing activities as a Data Controller and Data Processor.

What information do we hold about you?

We may collect or record basic personal information which you provide through electronic mail you send to us, or through other means of communication between you and us. The categories of personal information you provide may include, but is not limited to:

- Name
- Job title and company name
- Email address
- Contact Number
- Address

We do not generally seek to collect special category information, which is defined as:

- Racial or ethnic origin
- Political opinions
- Religious or philosophical beliefs
- Trade union membership
- Genetic data
- Biometric data
- Data concerning health
- Sexual orientation or sex life

This information will be collected, stored, accessed and processed in a secure manner.

Why do we process your information and the legal basis for doing so?

As a data controller and processor, we will only use your personal information if we have a legal basis for doing so. The purpose for which we use and process your information and the legal basis on which we carry out our processing activities is:

- Legitimate Interest
- For the Performance of a Contract

To provide you with information and materials that you request or have requested from us

- It is in our legitimate interests to respond to your queries and provide any information and materials requested in order to generate and develop business. To ensure we offer an efficient service, we consider this use to be proportionate and will not be prejudicial or detrimental to you.
- It is in our legitimate interests to improve the Site in order to enhance your experience on our Site, to facilitate system administration and better our services. We consider this use to be proportionate and will not be prejudicial or detrimental to you.

To personalise our services and products and the Sites to you.

- If you do not wish to receive tailored or personalised information from us based on personal information you have provided us, please contact us.
- It is in our legitimate interests to market our services and products. We consider this use to be proportionate and will not be prejudicial or detrimental to you.

To send you information regarding changes to our policies, other terms and conditions and other administrative information.

- It is in our legitimate interests to ensure that any changes to our policies and other terms are communicated to you. We consider this use to be necessary for our legitimate interests and will not be prejudicial or detrimental to you

To administer our Sites including troubleshooting, data analysis, testing, research, statistical and survey purposes;

To improve our Sites to ensure that consent is presented in the most effective manner for you and your computer, mobile device or other item of hardware through which you access the Sites; and to keep our Sites safe and secure.

- For all these categories, it is in our legitimate interests to continually monitor and improve our services and your experience of the Sites and to ensure network security. We consider this use to be necessary for our legitimate interests and will not be prejudicial or detrimental to you.

To enforce the terms and conditions and any contracts entered into with you.

- It is in our legitimate interests to enforce our terms and conditions of service. We consider this use to be necessary for our legitimate interests and proportionate.

If you do not wish to provide us with your personal data and processing such data is necessary for the performance of a contract with you and to fulfil our contractual obligations to you, we may not be able to perform our obligations under the contract between us.

Patron Hallow as a Data Processor

In certain cases, we also operate as a Data Processor and we collect and process personal information on behalf of our business customers in the provision of our services and products. In these circumstances, Patron Hallow Limited acts as a data processor and our business customers remain the data controller in respect of personal information they provide to us.

Our business customers remain the data [information] controllers with respect to any customer information that they provide to us for our provision of services. To the extent that we are acting as data processor, we therefore act in accordance with the instructions of such customers regarding the collection, processing, storage, deletion and transfer of customer information, as well as other matters such as the provisions of data subject rights. We will only use such personal information for the purposes of providing the services and products for which our business customers have engaged us.

Our business customers are responsible for ensuring that individuals' privacy is respected, including communicating to the individuals in their own privacy policies who their personal information is being shared with and processed by.

As a Data Processor, we may share personal information where instructed by our business customer. Where authorized by the business customer, we may also share personal information with third party service providers who work for us and who are subject to data protection legislation.

We will retain personal information which we process on behalf of our customers for as long as needed to provide services and products to our customers and in accordance with any agreement in place with our customers and in line with their retention periods.

Who might we share your information with?

We will not share your personal information other than as outlined in this Privacy Policy or without obtaining your consent beforehand.

Internal third parties

We may share your personal information with our group companies, affiliates, subsidiaries or contractors as necessary to carry out the purposes for which the information was supplied or collected (i.e. to provide the services and products you have requested from us).

External third parties

Personal information will also be shared with our third-party service providers and partners who assist with the running of the Sites and our services and products including, but not limited to, hosting providers & email service providers. Our third-party service providers and partners are subject to data protection legislation and are only permitted to process your personal information for specified purposes and in accordance with our instructions.

We may also post links to third party websites as a service to you. These third-party websites are operated by companies that are outside of our control, and your activities at

those third party websites will be governed by the policies and practices of those third parties. We encourage you to review the privacy policies of these third parties before disclosing any information, as we are not responsible for the privacy policies of other websites.

In addition, we may disclose information about you when we believe, that such use or disclosure is reasonably necessary, in the following ways (but not limited to):

- Complying with law enforcement
- Enforcing or applying the terms of any of our user agreements
- If we are under a duty to disclose or share your personal information in order to comply with any legal obligation;
- If necessary to protect the vital interests of a person; and to enforce or apply our terms and conditions or to establish, exercise or defend the rights of Patron Hallow Limited

What do we do to ensure the security of your personal information?

The security of your personal information is important to us. We follow generally accepted industry standards to protect the personal information submitted to us, both during transmission and once we receive it.

We use appropriate measures to safeguard personal information, which are appropriate to the type of information maintained and follows applicable laws regarding the safeguarding of any such information under our control. In addition, in some areas of our Sites, we use encryption technology to enhance information privacy and help prevent loss, misuse, or alteration of the information under our control. We also employ industry-standard measures and processes for detecting and responding to inappropriate attempts to breach our systems.

No method of transmission over the Internet, or method of electronic storage, can be 100% secure. Therefore, we cannot guarantee the absolute security of your information. The Internet by its nature is a public forum, and we encourage you to use caution when disclosing information online.

How long do we hold your information?

When you contact us, we may keep a record of your communication to help solve any issues that you might be facing. Your information may be retained for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirement.

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.

Details of retention periods for different aspects of your personal data are:

- During the agreement terms with a client
- Active leads and prospects
- Inactive leads

Ordinarily we retain data for 6 years following the end of a contract with a client.

Your rights

Subject to certain limitations, you have rights under data protection laws in relation to your personal data. These rights include the rights to:

- **The Right to Access** – (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. Note that we may refuse to comply with a request for access if the request is manifestly unfounded or excessive, or repetitive in nature.
- **The Right to Rectification** – 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. Note that we may refuse to comply with a request for correction if the request is manifestly unfounded or excessive, or repetitive in nature.
- **The Right to Erasure** – 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 that we may refuse a request for erasure, for example, where the processing is necessary to comply with a legal obligation or necessary for the establishment, exercise or defence of legal claims.
- **The Right to Restriction** – 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. Note that we may refuse to comply with a request for restriction if the request is manifestly unfounded or excessive, or repetitive in nature.
- **The Right to Data Portability** – 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 where your personal data is processed by us with your consent or for the performance of a contract and when processing is carried out by automated means.

All requests can be made to: DataProtectionOfficer@patronhallow.com or to Unit B, First Floor, 210 Cygnet Court, Centre Park, Warrington, WA1 1PP.

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. Nevertheless, we will always clarify our position to you.

We may need to request specific information from you to help us confirm your identity when making a request. This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it.

We will respond to all 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 in that regard.

Use of Cookies, IP Addresses and Aggregate Information

Cookies

In order to improve the Sites, we may use small files commonly known as “cookies”. Cookies are a technology that can be used to help personalize your use of a website. A cookie is a small amount of data which often includes a unique identifier that is sent to your computer or mobile phone (your “device”) from the Sites and is stored on your device’s browser or hard drive. The cookies we use on the Sites won’t collect personally identifiable information about you and we won’t disclose information stored in cookies that we place on your device to third parties.

To enable us to assess the effectiveness and usefulness of this Site, and to give you the best user experience, we collect and store information such as pages viewed by you, your domain names and similar information. Our Site makes use of anonymous cookies for the purposes of:

- Completion and support of Site activity;
- Site and system administration;
- Research and development; and
- Anonymous user analysis, user profiling, and decision-making.

By continuing to browse the Sites, you are agreeing to our use of cookies.

If you don’t want us to use cookies when you use the Sites, you can set your browser to notify you when you receive a cookie, giving you the chance to decide whether to accept it or decline at any time. However, if you block cookies some of the features on the Sites may not function as a result.

You can find more information about how to do manage cookies for all the commonly used internet browsers by visiting www.allaboutcookies.org. This website will also explain how you can delete cookies which are already stored on your device.

We may set the following cookies *from third parties*

Third Party Cookies	Cookie Name(s)	Purpose	Link
[Google Analytics]	Web traffic tracking DoubleClick by Google	[These cookies provide us with a visitor count and an understanding of how visitors move around and use the Sites. We can then use this information	<u>[Google Privacy Policy]</u>

[For use where Google Analytics used only] [We only use “Google Analytics” on the Sites. This cookie provides us with a visitor count and an understanding of how visitors move around and use the Sites. We can then use this information to improve navigability and the Sites generally. The cookies we use on the Sites won’t collect personally identifiable information about you and we won’t disclose information stored in cookies that we place on your device to third parties.]

[We are obliged by Google Analytics to state the following:]

[The Sites use Google Analytics, a web analytics service provided by Google Inc. (“Google”). Google Analytics uses “cookies”, which are text files placed on your computer, to

help the Sites analyse how users use the Sites. The information generated by the cookie about your use of the Sites (including your IP address) will be transmitted to and stored by Google on servers in the United States. Google will use this information for the purpose of evaluating your use of the Sites, compiling reports on website activity for website operators and providing other services relating to website activity and internet usage. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. Google will not associate your IP address with any other data held by Google. You may refuse the use of cookies by selecting the appropriate settings on your browser, however please note that if you do this you may not be able to use the full functionality of the Sites. By using the Sites, you consent to the processing of data about you by Google in the manner and for the purposes set out above.]

IP Addresses and Aggregate Information

An Internet Protocol ("IP") address is associated with your computer's connection to the internet. We may use your IP address to help diagnose problems with our server, to administer the Site and to maintain contact with you as you navigate through the Site. Your computer's IP address also may be used to provide you with information based upon your navigation through the Site.

Aggregate information is used to measure the visitors' interest in, and use of, various areas of the Site and the various programs that we administer. We will rely upon aggregate information, which is information that does not identify you, such as statistical and navigational information. With this aggregate information, we may undertake statistical and other summary analyses of the visitors' behaviors and characteristics. Although we may share this aggregate information with third parties, none of this information will allow anyone to identify you, or to determine anything else personal about you.

Links

The Sites may, from time to time, contain links to and from the websites of our business partners, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal information to these websites.

Complaints

For the UK: You have the right to make a complaint at any time with a supervisory authority, in particular in the EU (or EEA) state where you work, normally live or where any alleged infringement of data protection laws occurred. The supervisory authority in the UK is the Information Commissioner who may be contacted at www.ico.org.uk

Changes to this Policy

We keep our Privacy Policy under regular review.

This Statement was last updated 19 February 2024.