

HORNBLOWER BUSINESS BROKERS LIMITED

Privacy policy

1. Background and information about this privacy policy

- 1.1 This privacy policy sets out our commitment to maintaining the privacy and security of our website visitors and the users of our services.
- 1.2 We have prepared this policy to clearly set out and explain how we will safeguard and process your personal data.
- 1.3 As soon as you visit our website, we will ask you to give your consent to allow us to use cookies. We have a cookie policy on our website and all cookies will be used by us strictly in accordance with that policy which may be updated from time to time.
- 1.4 You control your privacy, and this will affect the way in which we process any personal data you give to us. You can specify what we can do with your personal data, such as using it for marketing and other purposes.
- 1.5 Information about us and how to contact us is set out at the end of this policy.

2. How we will use your personal data

- 2.1 In this paragraph we have set out information about:
 - 2.1.1 the categories of personal data that we may process in the course of our business;
 - 2.1.2 the purposes for which we may process your personal data; and
 - 2.1.3 the legal grounds for our processing of your personal data.
- 2.2 We may, as part of our business activities, process data about you as well as your use of and access to our website and services ("Your Data"). Included within Your Data will be your IP address, geographical location, the type and version of any browser you use to visit our website, your device's operating system, referral source, the length of your visit to our website, details of the pages of our website that you view and website the paths you follow when navigating our website, as well as information about the timing, frequency and pattern of your visits to our website and the use of our services. As such, Your Data may be processed by us for the purposes of analysing your use of, or access to, our website and services. The legal basis for this processing is our legitimate interests, namely the provision of our services as well as the effectiveness and availability of our website.

3. Data used for the provision of our services

- 3.1 We may process Your Data as provided by you in the course of the use of our services ("Your Service Data"). Your Service Data will be provided to us by you. Your Service Data may be processed by us for the purposes of:
 - 3.1.1 operating our website;
 - 3.1.2 providing our services;
 - 3.1.3 ensuring the security of our website and services;

3.1.4 maintaining back-ups of our databases; and

3.1.5 communicating with you.

3.2 The legal basis for this processing is our legitimate interests, namely the provision of our services.

4. Data about transactions between you and us

4.1 We may process information, including your personal data, relating to transactions, including purchases by you of our services ("Transaction Data"). Transaction Data may include personal data such as your contact details as well as details and information about any relevant transaction. Transaction Data may be processed for the purpose of supplying to you the purchased services, and for keeping proper records of those transactions.

4.2 The legal basis for this processing is the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract and our legitimate interests, namely our business interests.

5. Enquiries made by you on our website

5.1 We may process your personal data if it is contained in any enquiry you submit to us regarding products and/or services ("Enquiry Data"). Any Enquiry Data may be processed by us for the purposes of offering, marketing and selling relevant products and/or services to you.

5.2 The legal basis for this processing is consent.

6. Notifications and newsletters

6.1 We may process personal data that you provide to us for the purpose of subscribing to our email notifications and/or newsletters ("Your Notification Data"). You agree that we may process Your Notification Data for the purposes of sending you the relevant notifications and/or newsletters.

6.2 The legal basis for this processing is [consent].

7. Personal data and general communication between us

7.1 We may process personal data which is contained in or relating to any communication that you send to us ("Correspondence Data"). The Correspondence Data may include the communication content and metadata associated with the communication. Our website will generate the metadata associated with communications made with us by you using the contact forms which can be found on our website. Correspondence Data may be processed by us for the purposes of communicating with you and for the purposes of our own internal record-keeping.

7.2 The legal basis for this processing is consent.

8. Required processing of personal data

8.1 We may process any of your personal data identified in the other provisions of this policy where necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.

8.2 The legal basis for this processing is our legitimate interests, namely the protection and assertion of our legal rights, your legal rights and the legal rights of others.

9. Providing your personal data to others

9.1 We may, from time to time, need to disclose your personal data to our insurers and/or any of our professional advisers. This would only happen insofar as reasonably necessary for the purposes of us obtaining and maintaining insurance coverage, managing risks, obtaining professional advice and managing legal disputes.

9.2 There may be circumstances where we may need to disclose your personal data to some of our suppliers or subcontractors. If we do this, then it will only be insofar as reasonably necessary.

9.3 We may disclose any personal data you provide to us in respect of any enquiry by you about our website or our services to one or more of our selected third-party suppliers of any services we provide as set out on our website. This would be strictly for the purpose of enabling such suppliers to contact you so that they can offer, market and sell to relevant goods and/or services to you. In these circumstances, each such third party will act as a data controller in relation to the personal data provided by you in respect of your enquiry that we supply to them and upon contacting you, each such third party will provide you with a copy of their own privacy policy. The third party's privacy policy will then govern that third party's use of your personal data.

9.4 As well as for the specific disclosures of personal data set out above in this clause 9, we may also disclose your personal data where such disclosure is necessary or required for us to comply with a legal obligation to which we are subject, or for us to protect your interests or the interests of another natural person.

10. Transfers of your personal data outside of the EEA

10.1 This clause sets out information about the circumstances in which we may transfer your personal data to countries outside of the European Economic Area ("EEA").

10.2 Our offices are in the United Kingdom. Transfers of personal data to countries outside of the EEA will be protected by appropriate safeguards, such as the use of standard data protection clauses adopted or approved by the European Commission.

10.3 The hosting facilities for our website are situated in the UK. Transfers to the UK will be protected by appropriate safeguards, such as the use of standard data protection clauses adopted or approved by the European Commission.

10.4 You agree and acknowledge that when you submit any personal data via our website or services for general publication, then such information may be available, via the internet, anywhere in the world. In this case, you agree and acknowledge that we cannot prevent the use (or misuse) of such personal data by others.

11. What we do about retaining and deleting your personal data

11.1 Our retention and deletion procedures are designed to help ensure that we comply with our legal obligations.

11.2 Any personal data which we process will not be kept for longer than is absolutely necessary for the purpose or purposes in respect of which we are processing such data.

11.3 We will retain your personal data for a reasonable period and for no longer than is necessary for us to process it, after which time we shall delete it from our systems.

11.4 Notwithstanding the other provisions of this clause, we may retain your personal data where such retention is necessary for compliance with a legal obligation to which we are subject, or in order to protect your interests or the interests of another natural person.

12. Amendments to this privacy policy

12.1 We may update this privacy policy from time to time by publishing a new and updated version from time to time on our website. Please check back from time to time to ensure you are happy with any changes to this privacy policy.

12.2 We may choose to notify you of changes to this policy by email or through the private messaging system on our website, but this may not always be the case.

13. Your rights in regard to your personal data

13.1 In this clause 13, we have set out the rights that you have as an individual under data protection law. Some of the rights are complicated and can be tricky to understand, and not all of the details have been included in our summaries. As such, we recommend that you read the relevant laws and guidance from the regulatory authorities for a full explanation of these rights.

13.2 Your principal rights under data protection law are:

13.2.1 the right to access;

13.2.2 the right to rectification;

13.2.3 the right to erasure;

13.2.4 the right to restrict processing;

13.2.5 the right to object to processing;

13.2.6 the right to data portability;

13.2.7 the right to complain to a supervisory authority; and

13.2.8 the right to withdraw consent.

13.3 You have the right to request from us confirmation in respect of whether or not we process your personal data and, in circumstances where we do, access to the personal data, together with certain additional information. That additional information includes details of the purposes of our processing of your personal data, the categories of personal data concerned and the recipients of the personal data. Provided that in doing so the rights and freedoms of others are not affected, we will supply you with a copy of your personal data when requested by you to do so. The first copy will be provided to you free of charge, but additional copies may be subject to us charging a reasonable fee.

13.4 You have the right to have any inaccurate personal data which we store about you rectified and, taking into account the purposes of our processing of that personal data, to have any incomplete personal data stored by us about you completed.

13.5 In certain circumstances you have the right to the request the erasure of your personal data without undue delay. Those circumstances include:

- 13.5.1 the personal data we are storing is no longer necessary in relation to the purposes for which they were collected or otherwise processed by us;
 - 13.5.2 you withdraw consent to processing which is consent based;
 - 13.5.3 the processing is for direct marketing purposes;
 - 13.5.4 and the personal data has been unlawfully processed.
- 13.6 There are certain general exclusions of the right to erasure. Those general exclusions include where processing is necessary for the following reasons:
- 13.6.1 exercising the right of freedom of expression and information;
 - 13.6.2 compliance with a legal obligation; or
 - 13.6.3 for the establishment, exercise or defence of legal claims.
- 13.7 In some circumstances you have the right to restrict the processing of your personal data. Those circumstances are as follows:
- 13.7.1 you contest the accuracy of the personal data being processed;
 - 13.7.2 the processing is unlawful, but you oppose its erasure;
 - 13.7.3 we no longer need the personal data for the purposes of our processing, but you require personal data for the establishment, exercise or defence of legal claims; and
 - 13.7.4 you have objected to the processing of your personal data, pending the verification of that objection.
- 13.8 Where processing of your personal data by us has been restricted on the basis set out in clause 13.7 above, we may continue to store your personal data. In this situation, we will only otherwise process your personal data:
- 13.8.1 with your consent;
 - 13.8.2 for the establishment, exercise or defence of legal claims;
 - 13.8.3 for the protection of the rights of another natural or legal person; or
 - 13.8.4 for reasons of important public interest.
- 13.9 You have the right to object to the processing of your personal data by us on grounds relating to your particular situation. However, you may only object to the extent that the legal basis for the processing is that the processing is necessary for:
- 13.9.1 the performance of a task carried out in the public interest or in the exercise of any official authority vested in us; or
 - 13.9.2 the purposes of the legitimate interests pursued by us or by a third party.
- 13.10 If you make an objection as set out in clause 13.9 above, we will cease to process your personal data unless we can demonstrate that there are compelling legitimate grounds for the processing which overrides your interests, rights and freedoms, or the processing is for the establishment, exercise or defence of legal claims.
- 13.11 You have the right to object to our processing of your personal data:

13.11.1 for direct marketing purposes (including where we undertake profiling for the purposes of direct marketing). If you make such an objection, we will cease to process your personal data for this purpose;

13.11.2 for scientific or historical research purposes or statistical purposes on grounds relating to your particular situation, unless the processing is necessary for the performance of a task carried out for reasons of public interest.

13.12 To the extent that the legal basis for our processing of your personal data is consent, and such processing is carried out by automated means, you have the right to receive your personal data from us in a structured, commonly used and machine-readable format. However, this right does not apply where it would adversely affect the rights and freedoms of others.

13.13 If you consider that our processing of your personal information infringes any data protection laws, then you have a legal right to make a complaint about that processing with a supervisory authority responsible for data protection. You may do so in the EU member state of your habitual residence, your place of work or the place of the alleged infringement.

13.14 To the extent that consent is the legal basis for our processing of your personal data, you have the right to withdraw that consent at any time. Withdrawal of consent by you will not affect the lawfulness of any processing by us before the withdrawal.

13.15 You may exercise any of your rights in relation to your personal data by written notice to us in addition to the other methods specified in this clause 13.

14. All about us and how to get in touch

14.1 This website is owned and operated by Hornblower Business Brokers Limited.

14.2 We are registered in England and Wales under registration number 05974172 and our registered office is at St Brandons House, 29 Great George Street, Bristol BS1 5QT.

14.3 Our principal place of business is located at St Brandons House, 29 Great George Street, Bristol BS1 5QT.

14.4 You can contact us:

14.4.1 by post, using the postal address at clause 14.3 above;

14.4.2 using the contact form on our website;

14.4.3 by telephone using the number shown on our website; or

14.4.4 by email using the email address shown on our website.