

Privacy Statement

1. Introduction

- 1.1 This Privacy Statement explains what personal information Ondare may gather about you in connection with Ondare's services engagement and how this personal information may be used and shared. This Privacy Statement also sets out your rights in relation to your personal information and tells you who you can contact if you have questions.
- 1.2 This Privacy Statement is divided into the sections listed below:
- To whom does this Privacy Statement apply and what does it cover?
 - What personal information does Ondare collect?
 - How does Ondare collect personal information?
 - Disclosing personal information to Ondare relating to third parties
 - How does Ondare use your personal information?
 - On what basis does Ondare process personal information about you?
 - To whom will Ondare disclose your personal information?
 - How does Ondare keep your personal information secure?
 - How long will Ondare keep your personal information?
 - Sending you marketing information
 - What are your rights in relation to your personal information?
 - Changes to this Privacy Statement
 - Contact Ondare

2. To whom does this Privacy Statement apply and what does it cover?

- 2.1 This Privacy Statement applies to Ondare
- 2.2 This Privacy Statement sets out how Ondare will process your personal information as part of Ondare's services as may be relevant to you. Ondare is providing these services either under a direct contract with you or via a contract with another person (such as a company or a partnership or a trustee) who has asked Ondare to provide the services.
- 2.3 Your personal information will be protected and handled with consideration for its confidentiality and Ondare will only disclose it as set out in the "To whom will Ondare disclose your personal information?" section below.
- 2.4 In this Privacy Statement, Ondare refers to handling, collecting, protecting and storing your personal information as "processing".

3. What personal information does Ondare collect?

- 3.1 Ondare may collect personal information relating to you such as:
- Name
 - Contact Details (such as work or home address, email and phone numbers)
 - Date of birth
 - Government identifiers (such as social security number, unique tax reference and passport details)
 - Financial information
 - Calendar data (where applicable)
- 3.2 In order to provide services to you, Ondare may receive and also need to process personal information about you that may be considered special category (or "sensitive") personal information (special category personal information is considered to include information about your health, racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data or sexual orientation). Special category personal information about you includes information that may be reasonably inferred from other information that Ondare receives.
- 3.3 Where Ondare receives special category personal information or other information from which special category personal information can be reasonably inferred, Ondare will require explicit consent in order to process it.

4. How does Ondare collect personal information?

- 4.1 Ondare may collect personal information about you in different ways:
- you may provide it directly to Ondare
 - Ondare may obtain it because of the services that Ondare provides or has previously provided
 - Ondare may observe or infer it from the information you provide to Ondare and/or the way you interact with Ondare
- 4.2 This personal information can be received in any manner, including in-person discussions, telephone conversations, and electronic or other written communications.
- 4.3 Without access to all the personal information that Ondare needs, Ondare may be unable to provide or complete the services.
- 4.4 Where another party (such as a company or a partnership or any third parties acting on your or their behalf) provides your personal information to Ondare, they must also comply with their obligations under the relevant privacy laws and regulations. If you believe that the entity for whom you work or a third party has not provided you with details of the personal information that it holds about you and/or has not obtained your authority to provide Ondare with that personal information for processing as described in this Privacy Statement, then please contact such entity directly.

5. Disclosing personal information to Ondare relating to third parties

- 5.1 If any personal information which you provide to Ondare relates to any third party, for example a spouse or civil partner, co-habitee, individuals (including children) who depend on you financially, or a joint account holder or a beneficiary or trustee of a trust, then by providing Ondare with their personal information you will need to ensure that you have obtained any necessary permissions from those persons to the use of their personal information in the way set out in this Privacy Statement, or you are otherwise permitted to give Ondare this personal information. You should share a copy of this Privacy Statement with those other individuals before disclosing any personal information about them to Ondare.

6. How does Ondare use your personal information?

- 6.1 Ondare processes personal information about you to:
- establish or maintain Ondare's relationship with you
 - provide services to you and/or family member(s) or to the entity that has engaged Ondare to provide the services
- 6.2 Ondare may also use your personal information for the purposes of, or in connection with:
- compliance with applicable legal, regulatory or professional requirements
 - protecting Ondare's rights and/or property

7. On what basis does Ondare process personal information about you?

- 7.1 This Privacy Statement sets out the grounds upon which Ondare relies in order to process your personal information.
- 7.2 Ondare may use your personal information for the purposes outlined above because:
- i) where relevant, Ondare has a contract with you to provide services and processing your personal information is necessary for the performance of such contract; or
 - ii) Ondare is subject to legal, regulatory or professional obligations, or
 - iii) Ondare has a legitimate interest in processing your personal information, which may be to:
 - provide services to you and/or to the entity that has engaged Ondare to provide the services;
 - support the management of Ondare's client engagements;
 - evaluate, develop or improve Ondare's services; or
 - protect Ondare's business interests.

8. To whom will Ondare disclose your personal information?

- 8.1 In connection with one or more of the purposes outlined in this Privacy Statement, Ondare may disclose your personal information to:
- those with whom you have requested Ondare to share information, such as your colleagues
 - competent authorities, including courts and authorities in each case to comply with legal, regulatory or professional obligations or requests
 - vendors and administrative support, infrastructure and other service providers handling your information on Ondare's behalf; in each case, such vendors and service providers will be contractually bound by confidentiality and privacy obligations consistent with the obligations in this Privacy Statement
 - third parties to whom Ondare discloses information in the course of providing services to you or to the entity that has engaged Ondare to provide the services.

- 8.2 Ondare does not sell or lease your personal information to others.
- 8.3 For further details about the transfers described above and the adequate safeguards used by Ondare with respect to such transfers, please contact Ondare using the details below.

9. How does Ondare keep your personal information secure?

- 9.1 Ondare has in place reasonable commercial standards of technology and operational security to protect your personal information from loss, misuse and unauthorised access, disclosure, alteration or destruction. Only authorised personnel, with appropriate awareness of privacy obligations, are provided access to your personal information.

10. How long will Ondare keep your information?

- 10.1 Ondare retains personal information as long as is necessary to fulfil the purposes identified in this Privacy Statement or (i) as otherwise necessary to comply with applicable laws or professional standards, or (ii) as long as the period in which litigation or investigations might arise in respect of Ondare's services.

11. What are your rights in relation to your personal information?

- 11.1 You have various rights in relation to your personal information. In particular, you have a right to:
- obtain confirmation that Ondare is processing your personal information and request a copy of the personal information Ondare holds about you
 - ask that Ondare updates the personal information Ondare holds about you, or correct such information that you think is inaccurate or incomplete
 - ask that Ondare deletes personal information that Ondare holds about you, or restrict the way in which Ondare uses your personal information
 - withdraw consent to Ondare's processing of your personal information (to the extent Ondare's processing is based on your consent)
 - ask Ondare to stop or start sending you marketing messages at any time
 - obtain and/or move your personal information to another service provider
 - object to Ondare's processing of your personal information
- 11.2 Where Ondare's processing of special category personal information is reliant on your consent and you withdraw that consent, Ondare will cease processing the relevant information for the purposes of providing Ondare's services and the effect may be that Ondare is no longer able to provide the services.
- 11.3 However, Ondare may still retain a copy of the relevant information for as long as necessary to comply with applicable laws or professional standards, or as long as the period in which litigation or investigations might arise in respect of Ondare's services.
- 11.4 To exercise any of your rights or raise any questions that you have about Ondare's use of your personal information, please contact Ondare using the details below.

12. Changes to this privacy statement

- 12.1 Ondare may modify or amend this Privacy Statement from time to time at Ondare's discretion. When Ondare makes changes to this Privacy Statement, Ondare will amend the revision date and the modified or amended Privacy Statement shall apply to you and your personal information as of that revision date. The modified or amended Privacy Statement shall be made available on request.

13. Contact Ondare

- 13.1 If you have any questions or concerns regarding this Privacy Statement or your personal information, please contact Ondare by writing to the Data Protection Officer, Ondare, 13 Cortayne Road, London, SW6 3QA or by email to charlie.dugdale@ondare.co.uk
- 13.2 If you have any concerns about Ondare's use of your information, you also have the right to make a complaint to the Information Commissioner's Office, which regulates and supervises the use of personal data in the UK, via their helpline on 0303 123 1113. If you are not based in the UK, you have a right to complain to the EU Data Protection Authority ("DPA") in your jurisdiction. If you would like to be directed to the appropriate DPA, please contact Ondare.