

Data Privacy Notice

Effective date: 25th May 2018

Cupertino Partners Ltd. understands that you care about how the information about you is used and shared. This Privacy Notice explains the legal basis/ ground for contacting you, what information of yours may be collected, how the information will be used, and how you can control the collection, correction and/or deletion of information. This relates to our use of the data for marketing activities. We will not use or share your information with anyone except as described in this Privacy Notice. The use of information shall be limited to the purposes under this Privacy Notice.

1. Introduction

- 1.1. We want you to feel secure that we are committed to maintaining your privacy under the GDPR (General Data Protection Regulation) and DPA (Data Protection Act).
- 1.2. The following privacy notice provides an overview of how we protect your privacy, use and process your data as a data controller.
- 1.3. In this privacy notice, “we”, “us” and “our” refer to Cupertino Partners Ltd.

2. What information do we gather/ hold about you and how we use it?

- 2.1. The ways we collect data can be broadly categorised into the following:

- (a) Directly i.e. user provided data
- (b) Indirectly i.e. automatically collected data
- (c) Third party sources

In this section we set out the general categories of personal data that we may process, their sources, the purposes for which we may process personal data and the legal basis of processing

- 2.2. **Directly i.e. User provided data** - We also collect information when you voluntarily submit it to us. Throughout our site, we may provide the opportunity to request information, register for an event or seminar, order a white paper, or to submit an enquiry regarding our services. It is completely up to you whether or not you want to provide the information. We also collect information when you voluntarily submit it to us when meeting at events, exchanging business cards, etc. Some of that information is necessary for us to perform the required action and communicate with you. This data may include your name, email address, company name, phone number, etc.
- 2.3. **Automatically collected usage data** – This includes the information that is collected automatically through our Internet access logs. When you access this website, your Internet address is automatically collected and is placed in our Internet access logs. Another way this usage data is collected is through the use of analytics that use **cookies**. More information about the cookies can be found in **the Privacy and Cookie Policy**. Some data is collected through the CRM/email marketing platform that we use. The automatically collected usage data may include your IP address, geographical location,

browser type and version, operating system, referral source, length of visit, page views and website navigation paths, email open and clicks, etc.

- 2.4. **Other data** - We may obtain information, including Personal Data, from trusted third parties and sources such as advertisers, credit rating agencies, database companies, and other publically available materials/sources, other service providers.
 - 2.5. The data we hold or collect may be processed for the purposes of providing our services, communicating with you, operating our website, ensuring security on the website. The data may also be used for the purposes of offering, marketing and selling relevant services to you (both digitally and non-digitally). We may also use data for other purposes, which we would describe to you at the point we collect the information. The legal basis for this processing is the legitimate interest that is not over ridden by your rights as a data subject, or the performance of a contract with you and/or for taking steps at your request to enter into such a contract.
 - 2.6. We may process any of your personal data identified in this privacy notice where necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure. The legal basis for this processing is our legitimate interests i.e. the protection and assertion of our legal rights, your legal rights and the legal rights of others.
 - 2.7. We may process any of your personal data identified in this privacy notice where necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, or obtaining professional advice. The legal basis for this processing is our legitimate interests i.e. the proper protection of our business against risks.
 - 2.8. In addition to the specific purposes for which we may process your personal data set out in this section, we may also process any of your personal data where such processing is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.
 - 2.9. Please do not supply any other person's personal data to us, unless we prompt you to do so.
3. **Will we share this with outside parties?**
- 3.1. Data we collect will only be used within Cupertino Partners Ltd. We will not directly sell individual information to third parties. . Selected data may be shared with our appointed data processor for specific purposes.
 - 3.2. However we reserve the right to share your relevant personal data where necessary with our insurers and/or professional advisers where necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, obtaining professional advice, or the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure. We may also include this information in any sale of the company to a third party.
 - 3.3. We may also share some of your relevant personal data with our designated data processor for specific purposes.

3.4. In addition to the specific disclosures of personal data set out in this Section 3, we may share your personal data where such disclosure is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

4. **What about sensitive personal data?**

4.1. We do not generally seek to collect sensitive personal data. If we do seek to collect such data, we will ask you to consent to our proposed uses of the data. We may also collect some sensitive personal data incidentally. By providing us with unsolicited sensitive personal data, you consent to our using the data subject to applicable law as described in this Privacy Statement. The references to 'sensitive personal data' are to the various categories of personal data identified by European and other data privacy laws as requiring special treatment, including in some circumstances the need to obtain explicit consent.

5. **What rights do you have?**

5.1. In this Section 5, we have summarised the rights that you have under GDPR. Some of the rights are complex, and for more detailed information you should read the relevant laws and guidance from the regulatory authorities for a full explanation of these rights in the specific geography e.g. ICO in the UK.

5.2. Your principal rights under the data protection law are:

- a. the right to be informed about the collection and use of your personal data
- b. the right to access to the personal data we hold about you. Providing the rights and freedoms of others are not affected, we will supply to you a copy of your personal data as part of the Subject Access Request (SAR). The first copy will be provided free of charge, but additional copies may be subject to a reasonable fee. You can make the SAR by sending an email to info@cupertinopartners.com. We may need to verify your identity. The SAR enquiries will be dealt within 30 calendar days from the date of enquiry. However in certain circumstances, we may need to extend that by another 60 days, for which you will be notified in the first 30 days;
- c. the right to rectification inaccurate personal data about you;
- d. the right to erasure of your personal data in some circumstances;
- e. the right to restrict processing of your personal data in some circumstances;
- f. the right to object to processing of your personal data on grounds relating to your particular situation under some circumstances;
- g. the right to data portability of your personal data under some circumstances;
- h. the right to related automated decision making including profiling
- i. the right to withdraw consent where applicable; and
- j. the right to complain to a supervisory authority if you believe your right to privacy granted by the applicable law has been infringed upon

5.3. You may exercise any of your rights in relation to your personal data by written notice to us or by contacting us at info@cupertinopartners.com.

6. What about retaining and deleting data

6.1. This Section 6 sets out our data retention policies and procedure, which are designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of personal data.

6.2. Personal data that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.

6.3. It is not always possible for us to specify in advance the periods for which your personal data will be retained. In such cases, we will determine the period of retention based on the following criteria:

a. The legal grounds.

b. Fulfillment of purpose the data was collected/ processed for

c. In compliance with any corresponding law(s)

6.4. Notwithstanding the other provisions of this Section 6, 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 vital interests or the vital interests of another natural person.

7. What about data security?

7.1. We take appropriate steps to maintain the security of your data. We follow generally accepted industry standards to protect information submitted to us, both during transmission and once we receive it. We maintain appropriate administrative, technical and physical safeguards to protect your data against accidental or unlawful destruction, accidental loss, unauthorised alteration, unauthorised disclosure or access, misuse, and any other unlawful form of processing of the personal data in our possession. This includes password protection and other access and authentication controls and ensuring use of SSL certificates on the platforms we use.

7.2. However, you should understand that the open nature of the Internet is such that data may flow over networks without security measures and may be accessed and used by people other than those for whom the data is intended. No method of transmission over the Internet, or method of electronic storage, is 100% secure. We cannot ensure or warrant the security of any information you transmit to us, and you do so at your own risk. We also cannot guarantee that such information may not be accessed, disclosed, altered, or destroyed by breach of any of our physical, technical, or managerial safeguards.

7.3. If we learn of a security systems breach, we will inform you and the authorities of the occurrence of the breach in accordance with applicable law.

7.4. If you believe your personal data has been compromised or if you have any questions, please contact us at info@cupertinopartners.com.

8. Will we transfer this information internationally?

8.1. The data may be transferred internationally by a data processor if their hosted servers are outside the EU. However, in such cases the data processors have put in place relevant safeguards to comply with the EU GDPR.

9. Amendments

9.1. We may update this privacy notice from time to time by publishing a new version on our website.

9.2. You should check this page occasionally to ensure you are happy with any changes to this privacy notice.