

PRIVACY POLICY

1. Introduction

1.1 Welcome to the Farrant Group Limited's privacy policy

Farrant Group Limited respects your privacy and is committed to protecting your personal data. This privacy policy will inform you as to how we look after your personal data and tell you about your privacy rights and how the law protects you. In this policy, "you" refers to any individual (other than employees) whose personal data we hold or process. Farrant Group Limited is the controller and responsible for your personal data (collectively referred to as "the Company", "we", "us" or "our" in this privacy policy. "Personal data" means information that relates to you as an identified or identifiable person.

1.2 This privacy policy is designed to explain our practices regarding the collection, use and disclosure of personal information we may hold about clients, suppliers, experts, officials, academic researchers, journalists and other third parties. This privacy policy does not apply to information we hold in relation to our staff and freelance consultants which is covered by a separate privacy policy.

1.3 We have appointed a privacy officer who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, including any requests to exercise your

Full name of legal entity: Farrant Group Limited

Email address: peter.headden@farrantgroup.com

Postal address: 32 St James's Street, London, SW1A 1HD

1.4 You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK regulator for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

We keep our privacy policy under regular review. This version was last updated on 22 February 2021.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

2. How we use your personal data

2.1 We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

2.1.1 Where the processing is necessary in order for us to comply with our obligations under an agreement between you or your employer and us; or

2.1.2 Where you have consented to the processing; or

2.1.3 Where the processing is necessary for a "legitimate interest", a legitimate interest in this context means a valid interest we have, or a third party has in processing your personal data which is not overridden by your interests in data privacy.

3. Data which we collect

3.1 We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

3.1.1 Contact information (including but not limited to your name, address and email address) which we hold because you are our client or are in discussions with us regarding



our possible engagement or employed or engaged by one of our clients (for example, your email address or contact telephone number);

3.1.2 Contact information (including but not limited to your name, address and email address) which we hold because you are a third party relevant to the services we provide to our clients (you may for example be an intermediary or professional adviser, expert, academic or journalist or public policy researcher);

3.1.3 Marketing and communications data in relation to your personal marketing preferences;

3.1.4 Information about your expertise;

3.1.5 Biographical and other personal information which you provide to us as part of our services;

3.1.6 Other public information which is generally available.

3.2 You do not have to supply any personal information to us and you may withdraw our authority to process your personal data (or request that we restrict our processing – see paragraph 8) at any time.

4. Reasons why we process your personal data

4.1 We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

4.1.1 Where we need to perform the contract we are about to enter into or have entered into with you.

4.1.2 Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

4.1.3 Where we need to comply with a legal obligation.

4.1.4 Where we invite you to event's in given areas of interest or concern in order to develop the services that we provide.

4.1.5 Where we provide information and communicate with you, on our own behalf or on behalf of our clients, about areas of interest or concern.

4.2 We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us. If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

4.3 You can ask us or third parties to stop sending you marketing messages at any time by contacting us at any time.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of any agreement to provide services between the Company and you or your employer.

5. Data Retention

5.1 We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.



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, regulatory, tax, accounting or other requirements.

Our current data retention policy is to delete or destroy (to the extent we are able to) the personal data we hold about you in accordance with the following:

Category of personal data	Length of retention
Records relevant for tax purposes	6 years from the end of the tax year to which the records relate
Personal data processed in relation to a contract between you (or your employer) and us	6 years from the end of our contract with you or your employer
Personal data held on general contact or marketing databases	2 years from the last date on which you have interacted with us

5.2 For any category of personal data not specifically defined in this Policy, and unless otherwise specified by applicable law, the required retention period for any personal data will be deemed to be 7 years from the date of receipt by us of that data.

5.3 We review the personal data (and the categories of personal data) we are holding on a regular basis to ensure the data we are holding is still relevant to our business and is accurate. If we discover that certain data we are holding is no longer necessary or accurate, we will take reasonable steps to correct or delete this data as may be required.

5.4 If you wish to request that data we hold about you is amended or deleted, please refer to paragraph 8 below, which explains your privacy rights.

6. Sharing your information

6.1 We do not disclose personal information you provide to any third parties other than as follows:

6.1.1 As part of the provision of communications services we may disclose information to associates and suppliers, journalists, news and media organisations, professional advisers, researchers and other interested parties (although we will not usually disclose personal contact information without your consent);

6.1.2 if we are sub-contracting services to a third party or requesting expert advice on your behalf, we may provide information to that third party in order to provide the relevant services;

6.1.3 if we are under a duty to disclose or share your personal data in order to comply with any legal obligation (for example, if required to do so by a court order or for the purposes of prevention of fraud or other crime);

6.1.4 in order to enforce any terms or agreements for our services;

6.1.5 we may transfer your personal information to a third party as part of a sale of some or all of our business and assets to any third party or as part of any business restructuring



or reorganisation, but we will take steps with the aim of ensuring that your privacy rights continue to be protected;

6.1.6 to protect our rights, property and safety, or the rights, property and safety of our users or any other third parties. This includes exchanging information for the purposes of fraud protection and credit risk reduction.

6.2 Other than as set out above, we will not disclose any of your personal information unless you give us permission to do so. If we do supply your personal information to a third party, we will take steps to ensure that your privacy rights are protected and that third party complies with the terms of this policy.

7. Security

7.1 We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

8. Your privacy rights

8.1 Under certain circumstances, you have rights under data protection laws in relation to your personal data, as follows:

The right to be informed	You have a right to know about our personal data protection and data processing activities, details of which are contained in this policy.
The right of access	You can make what is known as a Subject Access Request ("SAR") to request information about the personal data we hold about you (free of charge, save for reasonable expenses for repeat requests). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing. If you wish to make a SAR please contact us as described above.
The right to correction	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. Please inform us if information we hold about you is incomplete or inaccurate in any way and we will update our records as soon as possible, but in any event within four weeks We will take reasonable steps to communicate the change to any third parties to whom we have passed the same information.
The right to erasure (the 'right to be forgotten')	This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. Please notify us if you no longer wish us to hold personal data about you (although in practice this may limit or



	<p>restrict our ability to provide services or assistance). Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request. Unless we have reasonable grounds to refuse the erasure, on receipt of such a request we will securely delete the personal data in question within four weeks. The data may continue to exist in backup form, but we will take steps to ensure that it will not be accessible.</p> <p>We will communicate the erasure to any third parties to whom we have passed the same information.</p>
The right to restrict processing	<p>This enables you to ask us to suspend the processing of your personal data in the following scenarios:</p> <p>If you want us to establish the data's accuracy.</p> <p>Where our use of the data is unlawful but you do not want us to erase it.</p> <p>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.</p> <p>You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.</p>
The right to data portability	<p>You have right to receive copies of personal data we hold about you in a commonly used and easily storable format (please let us know a format which suits you). You may also request that we transfer your personal data directly to third party (where technically possible).</p>
The right to object	<p>Unless we (or a third party) have/ has an overriding legitimate interest for such processing, you may object to us processing the data as it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.</p> <p>Please notify your objection to us and we will gladly cease such processing.</p>
Right to withdraw consent	<p>If we are relying on your consent as the basis on which we are processing your personal data, you have the right to withdraw your consent at any time. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain services to you. We will advise you if this is the case at the time you withdraw your consent. Even if you have not expressly given your consent to our processing, you also have the right to object (see above).</p>



8.2 All SARs and other requests or notifications in respect of your above rights must be sent to us in writing to the contact details mentioned on page 1 of this policy. We will endeavour to comply with such requests as soon as possible but in any event in accordance with applicable guidance and regulations.

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 could refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally it could 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.

9. International Transfers of your Personal Data

Our services are international in nature. Many of the external third parties with whom we interact in our business are based outside the UK so their processing of your personal data (if applicable) may involve a transfer of data outside the UK.

Whenever we transfer your personal data out of the UK, we ensure a similar degree of protection is afforded to it and that safeguards are in place to protect your personal data.