

Privacy Policy

3H Partners Limited (“we”, “us”, “our”, “the Company”) is committed to protecting and respecting your privacy.

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data). This policy sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed, stored and disclosed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it. By visiting <http://www.3hpartners.com> (the “Site”) or using any services offered through or associated with us or our Site (the “Services”), you are deemed to have accepted and consented to the practices described in this policy.

The Site is owned and operated by 3H Partners Limited, registered in England and Wales under Company No. 06755919, of registered address Bellside House, 4 Elthorne Road, London, N19 4AG (our “Company Address”). 3H Partners Limited processes personal data as a Data Controller, as defined in the Directive and the General Data Protection Regulation (**GDPR**).

The Site contains links to and from other websites. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

1. Data We Collect About You

We collect and process personal information so we can provide our Services to you. It's 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.

The data we collect and process about you is explained in the sections below.

1.1 Data You Give Us

You give us information about you by filling in forms on our Site or by corresponding with us by phone, e-mail or otherwise. This includes information you provide when you fill out our contact form, request a quote, apply for a job or subscribe to our marketing database.

If you are a **client** (or **potential client**), we collect your name, email address, phone number and some initial business information so we can contact you about our Services. This data is necessary for our legitimate interests. If you decide to engage our Services, we collect more detailed information about your business so we can tailor our Services to you, and payment information for invoicing purposes. This data is necessary for us to fulfill our contractual

obligations to you. We will ask for your explicit consent before collecting your information for our marketing database.

If you are a **job candidate**, we collect your name, education history and employment history so we can evaluate your application, and email address and phone number so we can contact you. If you become an **employee**, we will also collect your bank information and date of birth so we can fulfill our contractual obligations.

If you are a **business contact** or **supplier**, we collect your name, email address and business information so we can contact you, and your bank details so we can fulfill any payment obligations.

1.2 Data We Automatically Collect

Each time you visit or use our Site, we automatically collect the following information:

- **technical information**, including the Internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, location, network data, browser plug-in types and versions, languages, operating system and platform; and
- **information about your visit**, including the full Uniform Resource Locators (URL) clickstream to, through and from the Site (including date and time); pages you viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page and any phone number used to call our customer service number.

We use this information as statistical data about your browsing actions and patterns, for system administration, and to evaluate, provide, protect or improve our Services (including by developing new products and services). Because we collect, use and share this information in the aggregate, it does not identify any individual.

1.3 Data We Receive From Third Parties

We use SmartRecruiters and Google Forms to collect information about job candidates (such as name, email address, education history and employment history). We may also receive information from LinkedIn if you choose to fill out your application by connecting your LinkedIn profile. For more information on how these companies handle your personal data, please refer to their privacy policies.

2. How We Use Your Data

We use your data to carry out our Site and Services in the following ways:

- To ensure that content from our Site is presented in the most effective manner for you and for your device.
- To respond to communications from you and to provide you with information about our Services, including notifying you about changes to our Site or Services.
- If you are a **client** (or **potential client**): to administer and manage your account, to provide you with information you request from us, and to carry out any other obligations arising from any contracts entered into between you and us.
- If you are a **job candidate**: to evaluate your application and contact you about the position.
- If you are an **employee**: to manage your employment file, to carry out obligations arising from your employment contract and to carry out our legal obligations as an employer.
- If you are a **business contact** or **supplier**: to contact you about business opportunities or partnerships, to provide you with information you request from us, and to carry out any other obligations arising from any contracts entered into between you and us.

We also use your data to make our Site and Services better in the following ways:

- To administer the Site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes.
- As part of our efforts to keep the Site safe and secure (e.g. by conducting analysis required to detect malicious data and understand how this may affect your IT system).

We will not send you any unsolicited marketing or spam and will take all reasonable steps to ensure that we fully protect your rights and comply with our obligations under applicable data protection laws. If you are an existing customer, we will only contact you by electronic means with information about services similar to those which were the subject of a previous enquiry by you. If you are a new customer, and where we permit selected third parties to use your data, we (or they) will contact you by electronic means only if you have expressly consented to this.

You can ask us or third parties to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by contacting us at any time. If you do not want us to use your data in this way, or to pass your details on to third parties for marketing purposes, please notify us in writing or by email at the email address provided below.

3. How We Secure Your Data

All of your personal information is protected and we have put in place appropriate physical, electronic, and management procedures to safeguard and secure the data we collect. Your information is stored on secure cloud databases, firewall-protected internal servers, and on third party softwares. Your information is only accessible by employees who have authorised access rights to such information.

Unfortunately, the transmission of information via the internet is not completely secure. Although we do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our Site; any transmission is at your own risk. Once we have received your

information, we use strict procedures and the security features described above to try to prevent unauthorised access.

4. How Long We Store Your Data

We only keep your personal information for as long as it's necessary for our original legitimate purpose for collecting the information and for as long as we have your permission to keep it. Unless we have an overriding legal obligation, we will delete your personal information when you terminate your relationship with us by emailing us at the email address provided below.

5. Disclosure to Third Parties

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We use Google G-Suite productivity and collaboration tools, and they have access to data we share with their platform. If you are an employee, we also disclose your information to MorePay for payroll consulting. If you are a client, we may also engage external experts as needed for your project.

The **only** other circumstances under which we would share your personal data are:

- If the third party is a member of our group (which means any subsidiaries or ultimate holding company and its subsidiaries, as defined in section 1159 of the UK Companies Act 2006).
- In the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets.
- If the Company or substantially all of its assets are acquired by a third party, in which case personal data will be one of the transferred assets and the purchaser will be permitted to use the data for the purposes for which it was originally collected by us.
- If we're under a duty to disclose or share your personal data in order to comply with any legal obligation, enforce or apply our Terms & Conditions and other agreements, or to protect the rights, property, or safety of the Company, our customers, or others (including exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction).

6. International Transfers

Because we have suppliers and partners outside the EU, the data that we collect from you may be transferred to, and stored at, destinations outside the EU. By submitting your personal data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated as securely as it would be within the EU and under the GDPR. 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. You can obtain more details of the

protection given to your personal data when it is transferred outside the EU by contacting us using the email address provided below.

7. Your Rights

7.1 Lawful Bases

We will ensure that your personal data is processed lawfully, fairly, and transparently and that it will only be processed if at least one of the following bases applies:

- You have given your clear consent to the processing of your personal data for a specific purpose.
- Processing is necessary for the performance of a contract to which you are a party (or for us to take steps at your request prior to entering into a contract with you).
- Processing is necessary for our compliance with the law.
- Processing is necessary to protect someone's life.
- Processing is necessary for us to perform a task in the public interest or in the exercise of official authority and the task/function has a clear basis in law.
- Processing is necessary for our legitimate interests or the legitimate interests of a third party, except where there is a good reason to protect your personal data which overrides those legitimate interests, such as allowing us to effectively and efficiently manage and administer the operation of our business, maintaining compliance with internal policies and procedures, monitoring the use of our copyrighted materials, offering optimal, up-to-date security and obtaining further knowledge of current threats to network security in order to update our security.

7.2 Data Subject Rights

Under the GDPR, you have the right to:

- Withdraw your consent to the processing of your personal data at any time. Please note, however, that we may still be entitled to process your personal data if we have another legitimate reason for doing so (such as to comply with a legal obligation).
- Be informed of what data we hold and the purpose for processing the data, as a whole or in parts.
- Be forgotten and, in some circumstances, have your data erased by ourselves and our affiliates (although this is not an absolute right and there may be circumstances where you ask us to erase your personal data but we are legally entitled to retain it).
- Correct or supplement any information we hold about you that is incorrect or incomplete.
- Restrict processing of the information we hold about you (for example, so that inaccuracies may be corrected—but again, there may be circumstances where you ask us to restrict processing of your personal data but we are legally entitled to refuse that request).

- Object to the processing of your data.
- Obtain your data in a portable manner and reuse the information we hold about you.
- Challenge any data we use for the purposes of automated decision-making and profiling (in certain circumstances—as above, there may be circumstances where you ask us to restrict our processing of your personal data but we are legally entitled to refuse that request).
- Complain to a supervisory authority (e.g. the Information Commissioner’s Office (ICO) in the UK) if you think any of your rights have been infringed by us. (We would, however, appreciate the chance to address your concerns, so please contact us prior to taking this step).

You will not have to pay a fee to access your personal data (or to exercise any of the other rights) unless your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

You have the right to ask us not to process your personal data for marketing purposes. We will get your express opt-in consent before we use your data for such purposes or share your personal data with any third parties for such purposes, but you can exercise your right to prevent such processing by contacting us at the Company Address, via email at the email address provided below, or by unsubscribing using the links contained in the marketing emails.

You may revoke your consent for us to use your personal data as described in this Privacy Policy at any time by emailing us at the email address provided below, and we will delete your data from our systems. To enforce any of the above rights, please contact us at our Company Address or via email at the email address provided below.

We will notify you and any applicable regulator of a breach of your personal data when we are legally required to do so.

Changes To Our Privacy Policy

Any changes we may make to our Privacy Policy in the future will be posted on our Site and, where appropriate, notified to you by email. You will be deemed to have accepted the terms of the updated Privacy Policy on your first use of the Site following the alterations. Please check back frequently to see any updates or changes to our Privacy Policy.

Contact

Questions, comments and requests regarding this Privacy Policy are welcomed and should be addressed to our Company Address or to our email at privacy@3hpartners.com.