

PRIVACY POLICY

Hedosophia Services Limited

Registered Office: Yalding House, 152 Great Portland Street, London, W1W 6AJ

Registered: England and Wales

Registration Number: 09369134

Hedosophia Services Limited (“**we**”, “**us**”, “**our**”) are committed to protecting and respecting your privacy.

This policy (together with our terms of use and any other documents referred to in it) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed 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 www.hedosophia.com (“**our site**”) you are accepting and consenting to the practices described in this policy. You can withdraw such consent at any time.

For the purpose of the Data Protection Act 2018 (“**the Act**”) and Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (the “**General Data Protection Regulation**” or “**GDPR**”), the data processor and controller is Hedosophia Services Limited of 152 Great Portland Street, London, W1W 6AJ.

As used in this policy, the term “**Regulations**” shall include, together, the Act and the General Data Protection Regulation, each of them, as from time to time applicable, amended, restated or supplemented.

1. INFORMATION WE MAY COLLECT FROM YOU

We may collect and process the following data about you (including without limitation):

1.1 Information we may collect about you

With regard to each of your visits to our site we may automatically collect the following information:

- i. technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform; and
- ii. information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our site (including date and time); services 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.

1.2 Information we may receive from other sources

We may also work closely with third parties (including, for example, business partners, sub-contractors, analytics providers, search information providers) and may receive information about you from them.

2. USES MADE AND PROCESSING OF THE INFORMATION

We may use information held about you (information we collect about you and information we receive from other sources) in the following ways:

2.1 Information we may collect about you

We may process information that we collect about you:

- i. to administer our site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- ii. to improve our site to ensure that content is presented in the most effective manner for you and for your computer;
- iii. as part of our efforts to keep our site safe and/or secure;
- iv. to collect broad demographic information for aggregate use; and
- v. in co-operation with your internet provider, to identify you if we feel it is necessary to enforce compliance with our terms or use or to protect our service, site, users or others.

The legal basis for this processing is our legitimate interests and business and, the proper administration of our website and business.

2.2 Information we may receive from other sources

We may combine information that we receive about you from other sources and information we collect about you. We may use this information and the combined information for the purposes set out above (depending on the types of information we receive).

3. WHERE WE STORE YOUR PERSONAL DATA

The data that we may collect from you may be stored physically or transferred to, and stored on a cloud base service, that may be a destination outside the European Economic Area (“EEA”). By submitting your data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy and in compliance with the Regulations.

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

We cannot prevent the use (or misuse) of such personal data by others.

4. DISCLOSURE OF YOUR INFORMATION

4.1 Group members

We may share your information, where applicable, with any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 1159 of the UK Companies Act 2006 for the purposes set out in this policy.

4.2 Selected third parties

We may also share your information with selected third parties for the purposes set out in this policy. These selected third parties may include:

- i. analytics and search engine providers that assist us in the improvement and optimisation of our site; and
- ii. insurers and/or professional advisors for the purposes of maintaining appropriate insurance levels, managing risks, obtaining legal advice and managing disputes.

We may disclose your information to third parties:

- i. 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;
- ii. if all or substantially all of our assets are acquired by a third party, in which case personal data held by it about its members will be one of the transferred assets;
- iii. if we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms of use and other agreements; and/or
- iv. to protect the rights, property, or safety of Hedosophia Services Limited and our members or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

5. RETENTION AND DELETION OF PERSONAL DATA

We will retain and store personal data for as long as necessary for the purposes of compliance with our legal obligations under the Regulations, following which all your personal data stored and retained by us will be deleted from our files and records.

6. YOUR RIGHTS

Your rights under the Regulations are:

6.1 Information

You have the right to be informed of your rights and how your personal data will be stored, treated, deleted and controlled, as all is set out in this policy.

6.2 Access to information

You have the right to access your personal data, so that you are aware of and can verify the lawfulness of the processing. The Regulations give you the right to access information held about you. Your right of access can be exercised in accordance therewith. Any access request is free of charge.

Please note that we reserve the right to charge a reasonable fee taking into account the administrative costs of providing the information and/or refuse to respond to any access request, should any such requests be manifestly unfounded or excessive, if in particular, these requests are repetitive.

If any such requests are denied, you would have the right to complain to the supervisory authority (the Information Commissioner's Office).

6.3 Rectification

You have the right to rectification of any data that is incorrect and, taking into account the purposes of the processing, you have the right to request that any incomplete information is completed.

6.4 Erasure

You can request that any data is erased:

- i. where the personal data is no longer necessary in relation to the purpose for which it was originally collected/processed;
- ii. when you wish to withdraw consent;
- iii. when you object to the processing and there is no overriding legitimate interest for continuing the processing;
- iv. when your personal data has been unlawfully processed in breach of the Regulations; and
- v. when your personal data has to be erased in order to comply with a legal obligation.

6.5 Restriction

Processing of your personal data will be restricted in any of the following circumstances:

- i. where there is a contest regarding the accuracy of your personal data, we will restrict any processing until the data has been verified;
- ii. where you object to the processing and we need to consider whether your organisation's legitimate grounds override those of the individual;
- iii. when processing is unlawful and you oppose erasure and request restriction instead; and
- iv. if we do no longer need your personal data but you require the data to establish, exercise or defend a legal claim.

6.6 Data Access Portability

You may also, free of charge, request to view, access and use your personal and transaction data in a way that is generally portable.

6.7 Objection

You may express an objection on grounds relating to your particular situation to:

- i. processing based on legitimate interests or the performance of a task in the public interest/exercise of official authority (including profiling);
- ii. direct marketing (including profiling); and
- iii. processing for purposes of scientific/historical research and statistics.

6.8 DATA ACCURACY

Whilst we accept responsibility for maintaining the personal information entrusted to us on our site, we are not responsible for its accuracy over time or at the point of entry. If you identify any inaccuracy in your personal information, as a registered user you can make any necessary changes as required and as provided in this policy.

8. CHANGES TO OUR PRIVACY POLICY

Any changes we may make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy policy and to ensure that you are happy with any such changes.

9. CONTACT

Questions, comments and requests regarding this privacy policy are welcomed. You can contact us:

1. by e-mail at the following e-mail address: info@hedosophia.com;
2. by post, at our registered office address set out above; and
3. by telephone, using the contact number published on our website from time to time.

10. FILING OF COMPLAINTS

If you have any complaints or concerns about the contents of this policy or your personal data stored, processed and/or controlled by us, you can address these with the supervisory authority, the Information Commissioner's Office.

April 2019