

Procorre

Procorre is responsible for your Personal Data. Procorre comprises of Procorre Limited as well as other Procorre entities and affiliates. References in this Statement to “Procorre”, “we”, “our” or “us” include the Procorre Companies and the international offices. Each of these entities is committed to protecting your privacy.

1. When do we process your personal data?

We may process your Personal Data:

- when you, or an organisation with which you are connected, are our client (see 1 below);
- for marketing, business operation and relationship management purposes (see 2 below); and/or
- when you visit our Website (see 3 below).

Processing your personal data when you, or an organisation with which you are connected, are our client

1a. How we Collect your Personal Data when you, or an Organisation with which you are Connected, are our Client

When you or an organisation with which you are connected (e.g. your employer) engages us to perform services, we may collect certain Personal Data, by phone, e-mail, mail, contracts and by other means directly from you, your organisation and/or from publicly available resources (e.g. company filings).

1b. What Personal Data we Process when you, or an Organisation with which you are Connected, are our Client

Procorre will collect and process Personal Data including, where applicable:

- your name;
- your employer, your job title and/or position;
- your contact details, including your address, email address and phone number;
- documentation confirming your identity, such as your passport or driving licence;
- your status as a director of a company;
- your status as a beneficial owner of a company;
- financial information, including information necessary to make or receive payments to and from you and for the purposes of fraud prevention;
- details of your visits to Procorre and your correspondence, communications and connections with our staff;
- publicly available information; and
- any information which is provided to us by you or on your behalf.

1c. Legal Basis

We process this Personal Data according to the following legal bases:

Entering into and performing a contract: We process your Personal Data where it is necessary to enter into and perform our contract with you, and in particular:

- to incept you or your organisation as our client;
- to provide the services or matters that have been requested;
- managing and administering your or your organisation's business relationship with Procorre, including processing payments, accounting, auditing, billing and collection and support services; and
- for purposes related and/or ancillary to any of the above or any other purpose for which your Personal Data was provided to us.

It is necessary to provide us with your Personal Data on this basis as it is necessary to provide our services to you. The consequence for not doing so is that we will not be able to perform the services for which you or your organisation engage us.

Legitimate interests: We process your Personal Data where it is in our legitimate interests to do so, and in particular:

- to incept the organisation with which you are connected as our client;
- to enter into a contractual relationship with you and the organisation with which you are connected;
- to provide services or matters that the organisation has requested;
- managing and administering the organisation's and your business relationship with Procorre, including processing payments, accounting, auditing, billing and collection and support services;
- to conduct client due diligence checks; and
- for purposes related and/or ancillary to any of the above or any other purpose for which your Personal Data was provided to us.

When we process your Personal Data based on our legitimate interests, we make sure to consider and balance any potential impact on you and your data protection rights. We will not use your Personal Data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted by law).

You have certain rights when we process your Personal Data on this basis. For more on exercising your data subject rights please see 'Your Rights' below.

Compliance with legal obligations: We also process your Personal Data in order to comply with legal obligations to which we are subject. We process your Personal Data:

- to comply with our legal and regulatory obligations (e.g. record keeping obligations);
- to conduct client due diligence checks;
- to comply with our obligations under anti-money laundering and terrorist financing legislation;
- to comply as appropriate with the relevant governmental and/or regulatory authorities or bodies;

- to conduct conflict checks;
- to establish, exercise and defend our legal rights and any legal proceedings which may arise; and
- to prevent, detect and respond to actual or potential fraud or other illegal activities.

1d. Sharing and Disclosure of your Personal Data

We may disclose some or all of the Personal Data we collect from you to certain trusted third parties in accordance with contractual arrangements we have in place with these third parties or as required by law, including:

- the Procorre Companies;
- third parties such as technology service providers such as data room providers;
- other people in your organisation;
- our auditors and professional advisors;
- suppliers and service providers to whom we outsource support services;
- IT service providers;
- parties involved in hosting or organising events or seminars; and
- regulators and official authorities.

1e. Data Retention

In accordance with our Data Retention Policy, we shall keep the Personal Data we process on the instructions of our clients for a minimum period of 7 years after the client in question ceases to be our client. We retain the Personal Data so that we may fulfil our obligation and duty as a service provider to protect our client's interests, to protect our own interests as a service provider and as is required by legal and regulatory obligations to which we are subject.

2. Processing your personal data for marketing, business operation and relationship management purposes

2a. How we Collect your Personal Data which we Process for Marketing, Business Operation and Relationship Management Purposes

We may collect your Personal Data for marketing, business operation and relationship management purposes when you or your organisation:

- engage us, or enquire about engaging us, to provide advice or professional or services;
- communicate with any of our staff;
- visit our premises;
- work with us or supply us with services, or offer to;
- when you supply your Personal Data to us via our Website, email, in person, by telephone or otherwise;
- when you subscribe to, or express interest in, any of our newsletters or mailing lists, or access to our consultant portal; and
- when you attend, or express an interest in, any of our events or seminars.

2b. What Personal Data we Process for Marketing, Business Operation and Relationship Management Purposes

For marketing, business operation and relationship management purposes, Procorre will collect and process Personal Data including:

- your name;
- your employer, your job title and/or position;
- your contact details, including your address, email address and phone number;
- CCTV footage, when you visit our premises;
- your business activities and your areas of interest; and
- information relating to your subscription to, receipt of or interest in any of our mailing lists or newsletters, or registration to access any of our consultant portal.

2c. Legal Basis

We process this Personal Data according to the following legal basis:

Legitimate interests: We may obtain, collect and process your Personal Data where we have a legitimate interest in doing so. We have legitimate interests in:

- promoting our firm;
- inviting you to events, seminars, webinars and meetings;
- developing and maintaining relationships with business contacts (including you);
- conducting administrative and operational processes within our business;
- protecting the security and integrity of our premises, IT systems, online platforms and other systems;
- managing and administering our relationship with our business contacts and with our clients;
- sending you marketing material, newsletters, updates and other information; and
- monitoring and analysing your reception of, and interest in, material we send you.

When we process your Personal Data based on our legitimate interests, we make sure to consider and balance any potential impact on you and your data protection rights. We will not use your Personal Data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted by law).

You have certain rights when we process your Personal Data on this basis. For more on exercising your data subject rights please see 'Your Rights' below.

2d. Sharing and Disclosure of your Personal Data

We may disclose some or all of the Personal Data we collect from you to certain trusted third parties in accordance with contractual arrangements we have in place with these third parties, including:

- third parties who assist us in marketing and promoting the firm;
- suppliers and service providers to whom we outsource support services;
- IT service providers; and
- third parties involved in hosting or organising events or seminars.

2e. Data Retention

We will keep and process your Personal Data for these purposes for a period of seven years after collection. However, if you wish to opt out of receiving marketing emails, newsletters or other such communications, you may do so at any time by emailing us at marketing@procorre.com. Similarly if you wish to exercise your rights as a data subject over any of this Personal Data you may do so by emailing dpg@procorre.com. For more on exercising your data subject rights please see 'Your Rights' below.

3. Processing your personal data when you visit our website

How we Collect your Personal Data when you Visit our Website

3a. For information about how we collect your Personal Data when you visit our Website, please see our Cookie Policy.

3b. What Personal Data we Process when visit our Website

When you visit our Website, Procorre will collect and process Personal Data including:

- the name of the domain and host from which you access the internet;
- the internet protocol (IP) address of the computer which you are using;
- the browser software you are using;
- the operating system you are using; and
- the date and time at which you are accessing the Website.

Procorre will also collect and process information about your interaction with our Website using cookies. For more information on how we use cookies, please see our Cookie Policy.

3c. Legal Basis

We process this Personal Data according to the following legal basis:

Legitimate interests: We may obtain, collect and process your Personal Data where we have a legitimate interest in doing so. We have legitimate interests in:

- providing you with access to our Website and enabling you to use it;
- conducting administrative and operational processes within our business;
- protecting the security and integrity of our online platforms, IT systems and other systems;
- providing, improving, monitoring and testing the effectiveness of our Website;
- ensuring the content on the Website is presented in an effective, accessible and user-friendly format; and
- monitoring metrics such as numbers of visitors, traffic data and demographic patterns.

When we process your Personal Data based on our legitimate interests, we make sure to consider and balance any potential impact on you and your data protection rights. We will not use your Personal Data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted by law).

You have certain rights when we process your Personal Data on this basis. For more on exercising your data subject rights please see 'Your Rights' below.

3d. Sharing and Disclosure of your Personal Data

We may disclose some or all of the Personal Data we collect from you to certain trusted third parties in accordance with contractual arrangements we have in place with these third parties, including:

- suppliers and service providers to whom we outsource support services; and
- IT service providers.

3e. Data Retention

For information about how long we retain Personal Data collected when you visit our Website for, please see our Cookie Policy.

Personal data which you provide to us

It is your responsibility to ensure that all Personal Data you provide us with is complete, accurate and up-to-date in all respects and not misleading. Our ability to provide our advice and services, and the quality thereof, may be negatively affected if you fail to do so.

You may provide Personal Data about yourself or about other people to us during the course of our dealings with you. Whenever you provide us with Personal Data about another person, you must ensure that you are entitled to disclose the Personal Data relating to that other person to Procorre and that we may process that Personal Data in accordance with this Privacy Statement without having to take any further steps. It is your responsibility to ensure that the person concerned is aware of the content of this Privacy Statement.

Transfers of personal data

In certain circumstances we may transfer your Personal Data outside of the EU. We only transfer your Personal Data where the EU Commission has decided that the third country in question ensures an adequate level of protection in line with EU data protection standards, or where there are appropriate safeguards in place to protect your Personal Data. If you would like to find out more about the appropriate safeguards that we have in place to govern the transfer of your Personal Data you can contact us at dpq@procorre.com.

In particular when we transfer your Personal Data to those Procorre Companies which are situated outside of the EU, we shall do so in accordance with Standard Contractual Clauses to which Procorre and the Procorre Companies are subject.

Your rights

You have a number of rights regarding access to and control of your Personal Data, including:

Right of Access: You have the right to ascertain what type of Personal Data Procorre holds about you and to a copy of this Personal Data.

Right to Complain: You have the right to lodge a complaint regarding the processing of your Personal Data to the Data Protection Commission.

Right to Erasure: In certain circumstances you may request that we delete the Personal Data that we hold on you.

Right to Object: Where we rely on our legitimate interests to process your Personal Data, you have a right to object to this use. We will desist from processing your personal information unless we can demonstrate an overriding legitimate interest in the continued processing.

Right to Portability: You may request us to provide you with certain Personal Data which you have given us in a structured, commonly used and machine-readable format and you may request us to transmit your Personal Data directly to another data controller where this is technically feasible.

Right to Rectification: You have the right to have any inaccurate Personal Data which we hold about you updated or corrected.

Right to Restriction: You have the right to request that Procorre stop using your Personal Data in certain circumstances including if you believe that the Personal Data we hold about you is inaccurate or that our use of your Personal Data is unlawful. If you validly exercise this right, we will store your Personal Data and will not carry out any other processing until the issue is resolved.

Please bear in mind that your rights in relation to your Personal Data are not absolute and that we must be cognisant of our legal and regulatory obligations and our duties as a law firm.

You can exercise your rights in relation to your Personal Data by contacting dpg@procorre.com. We may request that you provide proof of your identity for security reasons and in order to prevent the unauthorised disclosure or misuse of Personal Data. We will only charge you for requests to access your Personal Data where they are unreasonable, unfounded or excessive. If, after contacting us, you are still not satisfied with our response, you have the right to lodge a complaint with the relevant local supervisory authority to your country.

Changes to this statement

We may amend this Statement on occasion, in whole or part, at our sole discretion. Any changes will be effective immediately. You should check this page from time to time to take notice of any changes we make, as they will be binding on you.

If at any time we decide to use your Personal Data in a manner significantly different from that stated in this Statement, or as otherwise disclosed to you at the time it was collected, we will notify you by e-mail or by telephone, and you will have a choice as to whether or not we use your Personal Data in the new manner.

Cookies and web beacons

We may collect information about your computer, including where available your IP address, operating system and browser type, for system administration and to collate aggregate information. This is statistical data about how you browse our website. In this website we use Google Analytics. Google Analytics uses cookies and web beacons in connection with the services it provides.

Information about your general Internet usage may be obtained by using a cookie file which is stored on the hard drive of your computer. Cookies contain information that is transferred to your computer's hard drive. Web beacons may also be used and these facilitate the transfer of data from our website to the Google Analytics website. Cookies and web beacons help us to improve our website and to deliver a better and more personalised service. They may be used to enable us to:

To estimate usage numbers, patterns and related activity.

To store information about how you accessed and use our website and your preferences, and so allow us to customise our website according to your individual interests.

To recognise you when you return to our website.

Information collected may be transmitted to and stored by Google on servers in the United States. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. You may refuse to accept cookies by activating the setting on your browser which allows you to refuse the setting of cookies. However, if you select this setting you may be unable to access certain parts of the website or be unable to avail of any of our services. Unless you have adjusted your browser setting so that it will refuse cookies, cookies will issue when you log on to our website.

Contact

For questions or any personal data requests, please email dpq@procorre.com.

Alternatively, please contact us using our postal address below:

Data Protection Group
60 St. Martin's Lane
London
WC2N 4JS