

## PRIVACY POLICY

This website (the "Website") is the website of Shardt Holdings Ltd. referred to as "Shardt Holdings Ltd.", "we" or "us". This Privacy Statement together with our terms of use (the "Terms of Use") and any other documents referred to in them 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 before using or submitting information to the Website to understand our views and practices regarding your personal data and how we will treat it. Shardt Holdings Ltd. respect your right to privacy and will process personal information you provide only in accordance with data protection and other applicable privacy laws.

### THE INFORMATION COLLECTED AND HOW IT IS USED

We may collect and process the following information about you:

#### Information you give us

This is information about you that you give us by filling in forms on the Website or by corresponding with us by phone, e-mail or otherwise. It includes information you provide when you report a problem with our site. The information you give us may include your name, e-mail address and phone number.

#### Other Information we collect about you

When you visit the Website, the web server collects some basic information such as your browser type, IP address, Internet service provider's domain name, which pages you accessed on the site, and when. We will use this information in the following ways:

#### Information you give us

We will use this information to provide you with the information and services that you request from us and to manage our relationship with you and (if relevant) any organisation that you represent.

#### Information we collect about you

We will use this information to:

- provide you with, and maintain the quality of, the Website; and
- analyse the use of the Website in order to help guide improvements.

We will collect the information for purposes set out above and as required by applicable law, regulations or other contracts and to allow Shardt Holdings Ltd. to fulfil its business needs and legal obligations and will take appropriate measures to ensure that we keep your information secure, accurate and up to date.

Shardt Holdings Ltd. may also collect anonymised details about visitors to the Website for the purposes of aggregate statistics or reporting purposes. However, no single individual will be identifiable from the anonymised details collected for these purposes.

### COOKIES

The Website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site. For detailed information on the cookies we use and the purposes for which we use them see our Cookie Notice.

### DISCLOSURE OF YOUR INFORMATION

We may share your personal information with:

- any agents of sub-contractors; and
- selected third parties including analytics and search engine providers, that assist us in the hosting, support, improvement and optimisation of our site.

We may delegate the processing of your personal information to IT service providers, acting as processors, located within the European Union. We may also disclose your personal information to third parties:

- 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 we are under a duty to disclose or share your personal data in order to comply with any legal obligation, where required to do so by applicable law, by a governmental body or by a law enforcement agency, or in order to enforce or apply our Terms of Use and other agreements; or
- to protect our rights, property, or safety, our investors in our funds, or others.

Except as described above, Shardd Holdings Ltd. will not disclose, sell or rent your personal information to any third party unless you have consented to this. If you do consent but later change your mind, you may contact Shardd Holdings Ltd. to ask for any such activity to stop.

## **INTERNATIONAL TRANSFERS**

Shardd Holdings Ltd. may transfer personal information that is collected from you to Shardd Holdings Ltd. affiliates or third-party data processors located in countries that are outside of the European Economic Area in connection with the above purposes. Please be aware that countries which are outside the European Economic Area may not offer the same level of data protection as the United Kingdom, although the collection, storage and use of your personal data will continue to be governed by this Privacy Statement.

We will only disclose your personal information to an affiliate or service provider outside the UK either:

- where the affiliate or service provider is located within the European Economic Area or in a country which has been assessed by the European Commission (or an equivalent UK body) as ensuring an adequate level of protection for personal information; or
- on the basis of an agreement, designed to protect your information, in the appropriate form approved for this purpose by the European Commission (or an equivalent UK body) – please contact us if you would like to see a copy of any of these agreements.

## **SECURITY**

Whilst Shardd Holdings Ltd. takes appropriate technical and organisational measures to safeguard the personal information that you provide, no transmission over the Internet can ever be guaranteed secure. Consequently, please note that the security of any personal information that you transfer over the Internet to Shardd Holdings Ltd. cannot be guaranteed. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

## **RETENTION OF INFORMATION**

We will retain information about you for 28 days, after which it will be deleted or anonymised.

## **YOUR RIGHTS**

You have the right:

- to be provided with copies of personal information that Shardd Holdings Ltd. hold about you at any time;
- to ask Shardd Holdings Ltd. to update, correct or delete any out-of-date or incorrect personal information held about you;
- to request the restriction of, or to object to, our processing of your personal information; and
- in certain circumstances, to receive your personal information that you have provided to us in a structured, commonly used and machine-readable format and to transmit that information to another controller.

If you wish to exercise any of the above rights, please contact us. You can also raise complaints or concerns about our use or other processing of your personal information with the Office of the Information Commissioner, which regulates data protection in the UK. Details are available at [www.ico.org.uk](http://www.ico.org.uk).

## **THIRD-PARTY SITES**

The Website may contain links to other websites operated by third parties. Please note that this Privacy Statement applies only to the personal information that Shardd Holdings Ltd. collects through the Website and Shardd Holdings Ltd. will not be responsible for personal information that third parties may collect, store and use through their website. You should always read the privacy policy of each website you visit carefully.

## **CHANGES TO OUR PRIVACY STATEMENT**

Any changes we make to our Privacy Statement 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 Statement.

## **CONTACT US**

Questions, comments and requests regarding this Privacy Statement are welcomed and should be addressed to Shardd Holdings Ltd., Kemp House, 160 City Road, London, EC1V 2NX or [info@shardd-holdings.com](mailto:info@shardd-holdings.com).