



# GP BULLHOUND GROUP – PRIVACY NOTICE

## OVERVIEW

GP Bullhound Holdings Limited and its various subsidiaries (the **GP Bullhound Group**) may process certain personal data about you, depending on the scope of your relationship and the legal and regulatory obligations applicable to that legal entity within the GP Bullhound Group, this may include the General Data Protection Regulation (2016/679), the e-Privacy Directive (2002/58/EC) and the Data Protection Act 2018 as amended or supplemented from time to time (the **Data Protection Laws**).

The GP Bullhound Group is committed to ensuring it meets all applicable regulatory and legal obligations in respect of data privacy and data protection.

## SCOPE

This Privacy Notice explains how the GP Bullhound Group (“**we**”, “**us**”, “**our**”), collects, uses, shares and otherwise processes your Personal Data in connection with your relationship with us as a GP Bullhound Group client or being generally interested in our services and our publications in accordance with applicable Data Protection Laws.

Should you have any questions about this Privacy Notice you can contact us at [marketing@gpbullhound.com](mailto:marketing@gpbullhound.com) or at the address mentioned below.

We may provide supplemental privacy notices on specific occasions when we are collecting or processing your Personal Data so that you are fully aware of how and why we are using your Personal Data. Those supplemental notices should be read together with this Privacy Notice.

We may update or amend this Privacy Notice from time to time. You should review this Privacy Notice frequently to ensure you are aware of the most recent version that will apply each time you engage with our products or services.

## PRIVACY AND DATA PROTECTION

The term “**Personal Data**” as used in this Privacy Notice means any information relating to you such as your name, contact details, bank account details etc. Personal Data does not include data from which you can no longer be identified such as anonymised aggregate data.

## WHAT INFORMATION DO WE COLLECT ABOUT YOU, HOW WE COLLECT IT AND WHAT WE USE IT FOR?

The type of Personal Data we may collect include, your contact details such as your name, address, email address, nationality, telephone number, date of birth, identification documents, signatures, occupation, and other Personal Data which is either requested from you or you choose to provide to us.

**GP.Bullhound**

GP Bullhound Holdings Limited, 52 Jermyn Street, London SW1Y 6LX, England Phone +44 207 101 7560

[www.gpbullhound.com](http://www.gpbullhound.com)



This information can be collected through various means, including but not limited to, from our website, marketing communication or as part of on-boarding you for any of our services as a client or customer.

We will process your Personal Data if and to the extent applicable law provides a lawful basis for us to do so. We will therefore process your Personal Data only:

- a) if you have consented to us doing so;
- b) if we need it to perform the contract we have entered into with you;
- c) if we need it to comply with a legal obligation; or
- d) if we (or a third party) have a legitimate interest which is not overridden by your interests or fundamental rights and freedoms. Such legitimate interests will be the provision of services by us, or administrative or operational processes within the GP Bullhound Group, and direct marketing.

We will use your Personal Data to deliver our services to you or the institution you work or act for. We may also use your Personal Data to inform you about our services and our marketing communications and events.

Please note that we may use or disclose Personal Data if we are required by law to do so or if we reasonably believe that use or disclosure is necessary to protect our rights and/or to comply with judicial or regulatory proceedings, a court order or other legal process.

## COOKIES

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Cookies are small text files that are placed on your computer or device by websites that you visit or HTML-formatted emails you open. You can access our Cookies Notice at [insert link].

## WHAT WE MAY NEED FROM YOU

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It is important that the Personal Data we hold about you is accurate and current. Please let us know if your Personal Data changes during your relationship with us.

We may need to request specific information from you to help us confirm your identity and ensure your right to access Personal Data (or to exercise any of your other rights). This is a further appropriate security measure to ensure that Personal Data is not disclosed to any person who has no right to receive it.

## WHAT IF YOU DO NOT PROVIDE THE PERSONAL DATA WE REQUEST?

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It is in your sole discretion to provide Personal Data to us. If you do not provide us with all or some of the Personal Data we request, we may not be able to accept an engagement from you, to provide all or some of our services, to enter into a contract with you or to send you requested marketing or other information.

## CHANGE OF PURPOSE AND ANONYMISATION

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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 which is compatible with the original purpose. 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.

In some circumstances we may anonymise your Personal Data so that it can no longer be associated with you, in which case it is no longer Personal Data.

## WITH WHOM WILL WE SHARE YOUR INFORMATION?

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When using your Personal Data for the purposes and on the legal basis described above we may share your Personal Data within the GP Bullhound Group around the world as well as services providers, affiliates or partners that we work with. We may also have to share your Personal Data with regulators, public institutions, courts or other relevant third parties.

## HOW LONG WILL WE RETAIN YOUR INFORMATION?

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We will only retain your Personal Data for as long as necessary to fulfil the purposes for which it was collected and processed, including for the purposes of satisfying any legal, regulatory, accounting or reporting requirements.

To determine the appropriate retention period for your Personal Data, we will 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 requirements.

In some circumstances we may anonymise your Personal Data so that it can no longer be associated with you, in which case it is no longer Personal Data.

Upon expiry of the applicable retention period we will securely destroy your Personal Data in accordance with applicable laws and regulations.

## TRANSFER OF PERSONAL DATA OUTSIDE THE EUROPEAN ECONOMIC AREA

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We may have to transfer your Personal Data from the European Economic Area (EEA) to a subsidiary within the GP Bullhound Group or a third party outside of the EEA and in a jurisdiction not being subject to an adequacy decision of the European Commission. We will always ensure that there is a legal basis and a relevant safeguard method for such data transfer so that your Personal Data is treated in a manner that is consistent with, and respects the Data Protection Laws and other applicable laws and regulations on data protection. We ensure that there is an appropriate level of protection and that the transfer is lawful through various controls including standard contractual clauses.

## SECURITY

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We store your Personal Data in a secure environment and have appropriate security measures in place such as encryption, to prevent Personal Data from being lost, stolen or otherwise used in an unauthorised manner.

## YOUR RIGHTS IN RELATION TO YOUR PERSONAL DATA

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You have rights as an individual which you can exercise under certain circumstances in relation to your Personal Data that we hold. These rights are to:

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- a) request access to your Personal Data (commonly known as a “data subject access request”) and request certain information in relation to its processing;
- b) request rectification of your Personal Data;
- c) request the erasure of your Personal Data;
- d) request the restriction of processing of your Personal Data;
- e) object to the processing of your Personal Data; and
- f) request that we transfer the data we have collected to another organisation or directly to you, under certain conditions.

## RIGHT TO WITHDRAW CONSENT

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In case you have provided your consent to the collection, processing and transfer of your Personal Data, you have the right to fully or partly withdraw your consent. To withdraw your consent, please contact [marketing@gpbullhound.com](mailto:marketing@gpbullhound.com).

Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose(s) to which you originally consented unless there are compelling legitimate grounds for further processing which override your interests, rights and freedoms or for the establishment, exercise or defence of legal claims. In case we processed your Personal Data for direct marketing purposes, you have the right to opt-out or unsubscribe at any time, in which case we will no longer process your Personal Data for such marketing purposes.

## COMPLAINTS

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You also have the right to make a complaint at any time to the Information Commissioner's Office (the ICO), the UK supervisory authority for data protection issues, or, as the case may be, any other competent supervisory authority of an EU member state. You can contact the ICO on 0303 123 1113 or at <https://ico.org.uk/make-a-complaint/>

## FURTHER INFORMATION

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If you have any concerns or require any further information, please do not hesitate to contact [marketing@gpbullhound.com](mailto:marketing@gpbullhound.com).

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