

## Privacy Policy

We are committed to safeguarding the privacy of our website visitors; this policy sets out how we will treat your personal information.

### **(1) What information do we collect?**

We may collect, store and use the following kinds of personal information:

- (a) information about your computer and about your visits to and use of this website (including your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views, and website);
- (b) information that you provide to us for the purpose of registering with us (including your name, your company name, your email address and your phone number);
- (c) information that you provide to us for the purpose of subscribing to our website services, email notifications and/or newsletters (including your name, your company name, your email address and your phone number);
- (d) any other information that you choose to send to us;

Before you disclose to us the personal information of another person, you must obtain that person's consent to both the disclosure and the processing of that personal information in accordance with the terms of this privacy policy.

### **(2) Using your personal information**

Personal information submitted to us via this website will be used for the purposes specified in this privacy policy or in relevant parts of the website.

We may use your personal information to:

- (a) administer the website;
- (b) send you general (non-marketing) commercial communications;
- (c) send you email notifications which you have specifically requested;
- (d) send you our newsletter and other marketing communications relating to our business or the businesses of carefully-selected third parties which we think may be of interest to you, by post or, where you have specifically agreed to this, by email or similar technology (and you can inform us at any time if you no longer require marketing communications);
- (e) provide third parties with statistical information about our users – but this information will not be used to identify any individual user;
- (f) deal with enquiries and complaints made by or about you relating to the website;
- (g) keep the website secure and prevent fraud;

We will not, without your express consent, provide your personal information to any third parties for the purpose of direct marketing.

### **(3) Disclosures**

We may disclose your personal information to any of our employees, officers, agents, suppliers or subcontractors insofar as reasonably necessary for the purposes set out in this privacy policy.

We may disclose your personal information to any member of our group of companies (this means our subsidiaries, our ultimate holding company and all its subsidiaries) insofar as reasonably necessary for the purposes set out in this privacy policy.

In addition, we may disclose your personal information:

- (a) to the extent that we are required to do so by law;
- (b) in connection with any ongoing or prospective legal proceedings;
- (c) in order to establish, exercise or defend our legal rights (including providing information to others for the purposes of fraud prevention and reducing credit risk);
- (d) to the purchaser (or prospective purchaser) of any business or asset that we are (or are contemplating) selling; and
- (e) to any person who we reasonably believe may apply to a court or other competent authority for disclosure of that personal information where, in our reasonable opinion, such court or authority would be reasonably likely to order disclosure of that personal information.

Except as provided in this privacy policy, we will not provide your information to third parties.

#### **(4) International data transfers**

Information that we collect may be stored and processed in and transferred between any of the countries in which we operate in order to enable us to use the information in accordance with this privacy policy.

Information which you provide may be transferred to countries (including the United States) which do not have data protection laws equivalent to those in force in the European Economic Area.

You expressly agree to such transfers of personal information.

#### **(5) Security of your personal information**

We will take reasonable technical and organisational precautions to prevent the loss, misuse or alteration of your personal information.

You acknowledge that the transmission of information over the internet is inherently insecure, and we cannot guarantee the security of data sent over the internet.

#### **(6) Policy amendments**

We may update this privacy policy from time to time by posting a new version on our website. You should check this page occasionally to ensure you are happy with any changes.

#### **(7) Your rights**

You may instruct us to provide you with any personal information we hold about you. Provision of such information will be subject to:

- (a) the payment of a fee (currently fixed at GBP 10); and
- (b) the supply of appropriate evidence of your identity (for this purpose, we will usually accept a photocopy of your passport certified by a solicitor or bank plus an original copy of a utility bill showing your current address).

We may withhold such personal information to the extent permitted by law.

You may instruct us not to process your personal information for marketing purposes, by sending an email to us. In practice, you will usually either expressly agree in advance to our use of your personal information for marketing purposes, or we will provide you with an opportunity to opt out of the use of your personal information for marketing purposes.

#### **(8) Third party websites**

The website contains links to other websites. We are not responsible for the privacy policies or practices of third party websites.

#### **(9) Updating information**

Please let us know if the personal information which we hold about you needs to be corrected or updated.

**(10) Contact**

If you have any questions about this privacy policy or our treatment of your personal information, please write to us by email to to [info@altarine.com](mailto:info@altarine.com) or by post to Altarine Partners, Suite 485, 19-21 Crawford Street, W1H 1PJ London, United Kingdom.