

## Hybridan Privacy Policy

### Introduction

Hybridan LLP's ("Hybridan") Privacy Policy explains how we collect and use personal data when you register to use our services, and through other means, such as email, in person or from other third-party sources.

This Privacy Policy applies when you visit our website <https://www.hybridan.com/> and also where we are in contact with you in other ways whether in your capacity as an individual or as director, shareholder, partner, employee or other representative of a company or other organisation.

This Privacy Policy does not apply to information you might provide to us or we might collect in the context of our providing corporate finance and corporate broking services. Where we are engaged to provide such services, our Client Data Protection Policy will apply.

Hybridan is registered with the UK Information Commissioner's Office ("ICO") under registration number Z3078463. Hybridan LLP is authorised and regulated by the Financial Conduct Authority ("FCA").

### Data Protection Principles

Hybridan adheres to the following when processing your personal data – data must be processed lawfully, fairly and in a transparent manner.

Purpose limitation - data must be collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes.

Data minimisation - data must be adequate, relevant, and limited to what is necessary in relation to the purposes for which they are processed.

Accuracy - data must be accurate and, where necessary, kept up to date.

Storage limitation - data must be kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed.

Integrity and confidentiality - data must be processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction, or damage by using appropriate technical or organisational measures.

### Information you provide us

You may provide us with personal data when you are introduced to us, when we meet you in person, or when we are in contact by phone, email, or in person, as well as through the website.

The categories of personal data you provide includes: first and last name; job title and company name; email address; phone number; postal address.

When we as a firm take on a non FCA authorised investor as a Professional Investor, the checks we go through may necessitate us asking for copies as well as original sight of a passport, driving license, utility bill, bank statement or similar. We retain these details on file as part of our AML checks.

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## Information we collect from third parties

We collect most of this information from you directly. We also work in conjunction with third parties (including, for example, business partners, professional advisors, search information providers, credit reference agencies) and may receive information about you from them.

## We also collect information about you:

- from publicly accessible sources, e.g. Companies House;
- from third party sources of information, e.g. client due diligence providers;
- which you have made public on websites associated with you or your company or on social media platforms such as LinkedIn; and
- from a third party, e.g. a person who has introduced you to us or other professionals (such as solicitors) you may engage.

## Information we collect online

If you interact with us online, we may use cookies and other technological tools to collect information about your device and your use of our Sites, such as your device's IP address, your user ID and session identifiers, what pages your device visited, and the time that your device visited our Site. You can find more information in our Cookie Policy at <https://www.hybridan.com/cookie-policy>.

## Sensitive personal data

We do not generally seek to collect sensitive (or special categories of) personal data. Sensitive personal data is defined by data protection laws to include personal data revealing a person's racial or ethnic origin, religious or philosophical beliefs, or data concerning health. If we do collect sensitive personal data, we will ask for your explicit consent to our proposed use of that information at the time of collection.

## How we use your information

The purpose for which we use and process your information and the legal basis on which we carry out each type of processing is explained below.

Purposes for which we will process the information and legal basis for the processing:

- To agree and perform contracts with you;
- To enforce the terms and conditions and any contracts agreed with you. If you do not wish to provide us with your personal data and processing such information is necessary for the performance of a contract with you, we may not be able to perform our obligations under the contract between us;
- To provide you with information and services that you request from us;
- To enable you to view material on our website, and sign up to our daily emailed newsletter;
- To send you emails such as thematic pieces of research and marketing communications concerning Hybridan, market developments or notifications we believe may be of interest to

you. You can always opt-out of receiving daily newsletters or other marketing-related email communications by sending us an email;

- To invite you to seminars, events, or other functions we believe may be of interest to you; and
- To populate our database which we use for marketing purposes. We endeavour to ensure that the contacts in our database are relevant and up to date. For email marketing to an individual subscriber (that is, a non-corporate or institutional professional investor email address) with whom we have not previously engaged as a client, we always seek your consent to send you email marketing.
- We consider this use to be proportionate and will not be prejudicial or detrimental to you, and as mentioned above you can always opt out.

Where we rely on legitimate interests as a lawful basis, we will carry out a balancing test to ensure that your interests, rights, and freedoms do not override our legitimate interests.

Hybridan 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 and that reason is compatible with the original purpose. If we need to use your personal data for an unrelated purpose, we will notify you in a timely manner and we will explain the legal basis which allows us to do so. You can always opt-out of receiving marketing-related email communications by sending Hybridan an email.

## **Who we share your personal data with?**

We respect your privacy and will not share your personal data with third parties except as provided in this Privacy Policy.

We share your information where required to allow us to provide the services that you have requested, in particular to enable you to receive information you have requested to be sent to you, or in order to fulfil a request you may have made.

We share your information with the following third parties:

- with Hybridan directors, staff and consultants based in the UK;
- with other professional advisors; and
- with our third-party data processors and service providers including marketing and IT support services such as data storage/back up services and disaster recovery.

Our third-party processors and service providers are subject to security and confidentiality obligations and are only permitted to process your personal data for specified purposes and in accordance with our instructions.

In addition, Hybridan may disclose information about you in the following circumstances:

- if we are under a duty to disclose or share your personal data in order to comply with any legal or regulatory obligation, for instance, we may disclose personal data to the FCA and to any other regulatory authority to which we are subject, or to any person in power to require such information pursuant to any legal enactment;
- if all or substantially all Hybridan's assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets; and
- to enforce or apply our terms and conditions or to establish, exercise or defend the rights of Hybridan, our staff, clients, or others.

## **Security of your personal data**

We use industry standard physical and procedural security measures to protect information from the point of collection to the point of destruction. This includes encryption, firewalls, access controls, policies, and other procedures to protect information from unauthorised access.

Where data processing is carried out on our behalf by a third party, we take steps to ensure that appropriate security measures are in place to prevent unauthorised disclosure of personal data.

Despite these precautions, however, Hybridan cannot guarantee the security of information transmitted over the Internet or that unauthorised persons will not obtain access to personal data. In the event of a data breach, Hybridan have put in place procedures to deal with any suspected breach and will notify you and any applicable regulator of a breach where required to do so.

## **How long we keep your personal data for**

Your personal data will not be kept for longer than is necessary for the purposes for which it was collected and processed and for the purposes of satisfying any legal, accounting, or reporting requirements. We have decided to retain personal data for up to 7 years after we cease providing services and products to you to comply with our legal obligations, resolve disputes or enforce our terms and conditions.

## **Access to your personal data**

You have the right to access information which we hold about you. If you so request, we shall provide you with a copy of your personal data which we are processing ("data subject access request"). We may refuse to comply with a subject access request if the request is manifestly unfounded or excessive or repetitive in nature.

We want to make sure that your personal data is accurate and up to date. You have the right to have inaccurate personal data rectified or completed if it is incomplete. Please contact us about this, we are here to help.

You can at any time ask to be removed from our database linked to daily newsletters and updates of a marketing nature.

In certain circumstances, you have the right to:

- request the erasure of your personal data erasure ("right to be forgotten").
- restrict the processing of your personal data to processing in certain circumstances.

Please note that the above rights are not absolute, and we may be entitled to refuse requests, wholly or partly, where exceptions under the applicable law apply. We may refuse a request for erasure, for example, where the processing is necessary to comply with a legal obligation or necessary for the establishment, exercise, or defence of legal claims. We may refuse to comply with a request for restriction if the request is manifestly unfounded or excessive or repetitive in nature.

You can exercise any of your rights as described in this Privacy Policy and under data protection laws by contacting our Privacy Manager as provided in "Contact us" section below.

Save as described in this Privacy Policy or provided under data protection laws, there is no charge for the exercise of your legal rights. However, if your requests are manifestly unfounded or excessive, in particular because of their repetitive character, we may either: (a) charge a reasonable fee taking into account the administrative costs of providing the information or taking the action requested; or (b) refuse to act on the request.

Where we have reasonable doubts concerning the identity of the person making the request, we may request additional information necessary to confirm your identity.

## **Website links to other sites**

Hybridan website may contain links to and from third-party websites. If you follow a link to any of these websites, please note that these websites have their own privacy policies and Hybridan does not accept any responsibility or liability for these policies.

## **Your emails to Hybridan**

Emails which you send to us or which we send to you may be monitored by Hybridan to ensure compliance with professional standards and our internal compliance policies. Monitoring is not continuous or routine, but occasional spot checks or audits may also be undertaken.

## **Your phone calls with Hybridan**

Hybridan records all telephone calls both from and to its office numbers and on any work-related mobile telephone to ensure compliance with professional standards and our internal compliance policies. Monitoring is not continuous or routine, but occasional spot checks or audits may also be undertaken. Hybridan directors and staff do not have the ability to switch off the voice recording systems or to interfere with them in any way.

## **Contact Us**

If you have any questions about our privacy policy or your information, you can contact The Privacy Manager:

By telephone: +44 (0)20 3764 2341 By email: [privacymanager@hybridan.com](mailto:privacymanager@hybridan.com)

## **Complaints**

If you have any complaints regarding our Privacy Policy or practices, please contact our Privacy Manager as provided in "Contacting Us" above.

You have the right to make a complaint at any time with a supervisory authority. The supervisory authority in the UK is ICO who can be contacted at <https://ico.org.uk> or telephone on 0303 123 1113.

## **Changes to our Policy**

From time to time, we may change this Privacy Policy. The current version of this Policy will always be available on our website or by writing to The Privacy Manager.