



HAWTHORN

HAWTHORN ADVISORS LIMITED

Privacy Policy

INTRODUCTION

We understand that our clients trust us to deal with their affairs and with their confidential information, so we take privacy and the protection of client data very seriously.

This privacy notice ("**Notice**") explains how Hawthorn Advisors Limited ("**Hawthorn**") collects, uses, processes and shares the personal data of our clients and users of our website hosted at www.hawthornadvisors.com ("**Site**") (together, "**you**", "**your**"), and your rights in relation to the personal data we hold.

Hawthorn Advisors Limited is a company registered in England and Wales (registered company number 08355056) whose registered address is Fifth Floor, Partnership House, Carlisle Place, London, United Kingdom, SW1P 1BX. We are the data controller of your personal data and are subject to the UK General Data Protection Regulation (the "**UK GDPR**") and the UK Data Protection Act 2018.

We may amend this Notice from time to time. When we do so, we will publish the revised version of this Notice on our Site. This Notice was last updated in January 2023.

HOW WE COLLECT YOUR INFORMATION

We may collect your personal information in a number of ways, including:

- when you access and navigate around the Site;
- from the information you provide to us when you interact with us before becoming our client;
- from any pre-engagement process we undertake to onboard you as a client;
- from third parties, for example from publicly accessible sources, such as Companies House, or from a third party with your consent, such as your financial or legal advisors and consultants and other professionals we may engage in relation to the work we do for you;
- when you communicate with us by post, email, telephone or via the Site, for example when you submit an enquiry;
- in various other ways you interact with us in the normal course of providing professional services to you, for the various purposes set out below.

THE TYPES OF INFORMATION WE COLLECT

We may collect the following types of personal data about you:

- contact and communications information, including:



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- your contact details (including email address(es), telephone numbers and postal address(es);
- your communication preferences;
- records of communications and interactions we have had with you;
- biographical information, including:
 - your name, title, gender, nationality, and date of birth;
 - details of your professional activities and employment, including job title and function;
 - due diligence information, including your passport or driver's licence or National ID information, proof of address, national insurance number and other due diligence information such as the results of anti-money laundering and "know your client" background checks (for example, if we are required to establish whether or not you are a politically exposed person or subject to any sanctions);
 - information concerning your engagement with us, including attendance at our events, responses to surveys, records of meetings, etc.;
- financial information, including:
 - details of financial payments received from you;
 - your payment details, such as your bank account number, name and sort code;
 - other financial information about you and/or your business, provided that is it relevant to the work we do for you;
- technical data from your use of the Site, including:
 - the Internet protocol (IP) address, cookie identifier, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform; and
 - website data, including the full Uniform Resource Locators (URL) clickstream to, through and from our site (including date and time), page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs) and methods used to browse away from the page.

Further information about how we use cookies can be found on our Site [here](#).

- any other personal data relevant to the services we provide our clients with.

Under the UK GDPR, certain categories of personal information are recognised as sensitive, including health information and information regarding race, religious beliefs and political opinions. We may collect such sensitive personal data, including information concerning



your health and medical conditions (for example, disability and dietary needs), where this is necessary or relevant for the provision of services to you or our clients.

THE BASIS FOR PROCESSING YOUR PERSONAL INFORMATION AND HOW WE USE IT

Under data protection law, we can only use your personal data if we have a proper reason for doing so.

We may process your personal data because it is *necessary for the performance of a contract* with you or in order to take steps at your request prior to entering into a contract. In this respect, we use your personal data for the following:

- to interact with you and answer your enquires about our professional services before you become our client;
- to onboard you and liaise with you as a client;
- to provide our professional services to you (including PR advice and associated advisory services);
- to manage our relationship with you (including billing and financial management), for record-keeping purposes and more generally for the proper operation of Hawthorn; and
- for any other purpose related to our services for which you provide us with your personal data.

We may also process your personal data because it is *necessary for our or a third party's legitimate interests*. Our "legitimate interests" include the provision of our strategic communications services, the operation of Hawthorn as a business, and the operation of our Site in a commercial, user-friendly and sustainable way, in accordance with all relevant legal rights and obligations, to facilitate delivery of the best service to our clients.

In this respect, we may use your personal data for the following:

- to process enquiries, feedback, complaints and manage our internal record-keeping in relation to the same;
- for our internal purposes, such as quality control, and to monitor and evaluate the performance and effectiveness of the Site and our services, including to administer, support, keep secure or improve the Site, and to train our staff and monitor their performance;
- to outsource selected Site administration functions to third parties for the purposes of the efficient management of the Site;
- to seek advice on our rights and obligations, such as where we require legal advice.

We may also process your personal data for our *compliance with our legal obligations*. In this respect, we may use your personal data for the following:



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- to meet our compliance, legal and regulatory obligations, such as compliance with anti-money laundering laws, tax reporting and anti-bribery requirements;
- for the prevention and detection of crime;
- to deal and assist with legal claims, requests and investigations, including those made under data protection law, or requests for formal disclosure by competent authorities; and
- to administer and maintain such records as may be required by UK regulations and legislation from time to time.

We may also process your personal data *for additional reasons* where:

- it is necessary to protect your or another person's vital interests;
- it is necessary for the establishment, exercise or defence of legal claims (for example, to protect and defend our rights or property); or
- we have your specific or, where necessary, explicit consent to do so (for example, where we need your consent to send you our marketing communications by email, or to process your special category personal data).

Please note that where our processing of your personal data relies on your consent and where you then withdraw that consent, we may not be able to carry out all or some aspects of our activities and/or it may affect the delivery of those activities to you.

SHARING YOUR INFORMATION WITH OTHERS

For the purposes referred to in this Notice and relying on the bases for processing as set out above, we may share your personal data with certain third parties. We only allow third party service providers to handle your personal data if we are satisfied they take appropriate measures to protect your personal data. Where appropriate, we will impose contractual obligations on third party service providers to ensure they can only use your personal data to provide services to us and to you and that appropriate confidentiality obligations are in place.

We may disclose limited personal data to a variety of recipients including:

- our employees, agents, contractors or partners where there is a legitimate reason for their receiving the information, including third parties we have engaged to process data on our behalf as part of providing a service to you;
- providers of outsourced services to us (for example, any third party we engage to administer our Site on our behalf, and the providers of "back office" functions and tools);
- internal and external auditors and our legal professional advisors;
- any regulatory or government body, court, law enforcement agency and other authority of competent jurisdiction if we are under a duty to disclose or share your personal data in order to comply with any legal obligation; and



- other third parties where you have given your consent for us to do so.

INTERNATIONAL TRANSFERS OF DATA

As a matter of course, we do not transfer your personal data outside of the UK and/or the European Economic Area (“EEA”). We may, however, transfer your personal data around the world on an *ad hoc* basis, for example where this is necessary for our interaction with you, and you are located outside of the EEA, or where there is an international dimension to the matter in which we are advising you. In such circumstances, we will consider whether any additional measures are required to give adequate protection for the information when it is transferred outside of the EEA.

HOW LONG YOUR INFORMATION IS KEPT

We retain your personal data only for so long as is necessary to deliver our services to you, and to protect our legal interests or as otherwise stated to you when your data is collected.

To determine the appropriate retention period for personal data, we consider the volume, nature, and sensitivity of the personal data, the potential risk of harm from any unauthorised use or disclosure, the purposes for which we process your personal data, whether we can achieve those purposes through other means, and the applicable legal requirements.

When it is no longer necessary to retain your personal data, we will delete or anonymise it.

YOUR RIGHTS

Under the UK GDPR, you have the following rights in relation to our processing of your personal data:

- to obtain access to, and copies of, the personal data that we hold about you;
- to require us to correct the personal data we hold about you if it is incorrect;
- to require us to erase your personal data in certain circumstances;
- to require us to restrict our data processing activities in certain circumstances (and, where our processing is based on your consent, you may withdraw that consent, without affecting the lawfulness of our processing based on consent before its withdrawal);
- to receive from us the personal data we hold about you which you have provided to us, in a reasonable format specified by you, including for transmitting that personal data to another data controller;
- to object, on grounds relating to your situation, to any of our processing activities where you feel this has a disproportionate impact on your rights; and
- to complain about the processing of your data to the UK data protection regulator - the Information Commissioner’s Office (ICO) (www.ico.org.uk). The ICO does though recommend that you first try and resolve the complaint with us.

Please note that the above rights are not absolute, and we may be entitled (or required) to refuse requests where exceptions apply. For example, if we have reason to believe the



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personal data we hold is accurate or we can show our processing is necessary for a lawful purpose set out in this privacy notice.

If you have given your consent (e.g. to receive promotional material from us) and you wish to withdraw it, please contact am.clarke@hawthornadvisors.com. Please note that where our processing of your personal data relies on your consent and where you then withdraw that consent, we may not be able to provide all or some aspects of our services to you and/or it may affect the provision of those services.

CONFIDENTIALITY AND SECURITY

We are committed to ensuring that your information is secure with us and with third parties who act on our behalf.

We have appropriate security measures to prevent personal data from being accidentally lost, or used or accessed unlawfully. We limit access to your personal data to those who have a genuine business need to access it. We will seek to ensure that those processing your information will do so only in an authorised manner and, if appropriate, are subject to a duty of confidentiality.

We impose strict standards of confidentiality on our directors and employees and emphasise to them the importance of protecting client data.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

CONTACT

If you have any questions about this Notice, or how we process your personal data, or if you would wish to exercise any of your legal rights in respect of your personal data, please contact Anna Maria Clarke, Chief Operating Officer and Data Protection Lead at am.clarke@hawthornadvisors.com.

Last updated: January 2023